

October 22, 2021

**U.S. Citizenship and Immigration Services**  
**Department of Homeland Security**  
**20 Massachusetts Avenue NW**  
**Washington, DC 20529-2140**  
Submitted via [www.regulations.gov](http://www.regulations.gov)

Re: DHS- Docket No. USCIS-2021-0013; Comments on Public Charge Ground of Inadmissibility

We are writing on behalf of more than 630 national, state, and local organizations and agencies in 46 states and the District of Columbia in response to the Department of Homeland Security's (DHS) advance notice of proposed rulemaking (ANPRM) published on August 23, 2021. Our organizations represent diverse sectors, including health care providers and advocates, food security, housing, immigrant rights, civil rights, economic security, women's, reproductive rights, children's, education, faith-based, organized labor, academia, and philanthropy as well as state and local agencies. Note that some of our organizations are also providing more detailed comments with justifications to support these recommendations, and specific responses to the questions posed in the ANPRM.

Our organizations share the view that the nation is stronger when we welcome people who are willing to contribute to the country and recognize their potential. We recognize that our communities and economy depend on the labor of immigrants and U.S. citizens who too often receive modest pay and few benefits for their essential work, and that public benefits play a critical role in supplementing their earnings. Nationally, such core health, nutrition, and housing assistance programs help nearly half of Americans make ends meet. These supports should in no way be linked to the exclusionary "public charge" provision – they represent the country's policy choices about how to help all workers and families succeed. Time and again, individuals with limited means make important contributions to the U.S. – caring for the most vulnerable, teaching our children, keeping us fed, and enriching the country.

Accordingly, our immigration laws should not discourage immigrants and their family members from seeking physical or mental health care, nutrition, or housing benefits for which they are eligible. We urge DHS not to exclude people from immigrating simply because conditions in their countries of origin, discrimination they may have faced in the U.S., and other

circumstances have made it difficult for them to complete an education, secure professional credentials, or earn a high income.

In addition to ensuring that the exclusion is narrow and does not amount to a wealth or income test – which as noted would be completely counter to the public interest – the public charge regulations must also be clear. Clear regulations will set parameters so that immigrants, their families, and service providers can understand how a public charge assessment will be determined. This is particularly important because lack of clarity can cause the same damage as an overly broad rule. It can cause immigrant families to avoid interacting with the government and forgo critical public benefits for which they are eligible as a consequence of fear and confusion. An unclear rule can also create unintended consequences, such as a domestic violence survivor forgoing police protection or a parent becoming fearful of seeking health care for their child. Moreover, the regulation should include guardrails to prevent a public charge determination from being used as a tool to discriminate against people of color, women, people with disabilities, older adults, or anyone else.

For these reasons, we recommend the following key elements of the public charge determination.

### **Definition and Purpose**

DHS should define someone likely to become a public charge for inadmissibility purposes as a person who is “likely to become primarily and permanently reliant on the federal government to avoid destitution.” This would be consistent with the congressional intent and historical understanding of public charge as applying to a narrow set of immigrants who are likely to become a “public charge” by virtue of being so in need of assistance that they were housed in almshouses and poorhouses for indefinite stays. It is also consistent with case law. In 2020, the [Second Circuit](#) Court of Appeals relied on the Board of Immigration Appeals’ interpretation of ‘public charge’ to mean a person who is “unable to support herself, either through work, savings, or family ties.”

This approach follows from the evidence presented above that people of limited means, including immigrants, make extraordinary contributions to American life and that full use of health, nutrition, and income support programs by immigrant and U.S. citizen members of the community is good economics and good policy.

Under this definition, reliance on the government should not be taken into account unless:

- **The government provides the *primary* source of income.** Many people receive only modest public benefits that supplement their earnings by improving their access to nutrition, health care, and other services. Using these supplemental benefits will not make a person a public charge. In addition, if an individual is relying on a benefit, but is also receiving income from a job or income from other family members in the household, the individual is not *primarily* reliant on the government. [The Ninth Circuit Court of Appeals](#) (Ninth Circuit) found that the concept of public charge did not “encompass” people who used benefits that “were not sufficient to provide basic sustenance.”
- **The reliance is *permanent*.** There are many scenarios where people receive government benefits for a period of time but not permanently: for example, if an individual is currently using a benefit but is about to get a raise or a new job and will no longer access it, or if someone is recovering from a temporary illness or treatment and relying on a federal government benefit to recuperate. The [Ninth Circuit](#) also found that public charge had never encompassed persons likely to make “short-term use” of benefits.
- **The reliance is to avoid destitution.** The [Board of Immigration Appeals](#) has held that the “ordinary meaning” of the term public charge, refers to individuals “being destitute.” Likewise, [federal courts](#) have held repeatedly in *in forma pauperis* cases that public charge and destitute are synonymous.

### Public Benefits Considered

The definition “likely to become primarily and permanently reliant on the federal government to avoid destitution” should guide any assessment of an applicant’s benefit use. We recommend that the public charge notice of proposed rulemaking (NPRM):

- **Consider only two specific, *federal* programs that provide cash assistance for income maintenance.** Receipt of health care, nutrition or housing assistance is not an indication that a person is primarily or permanently reliant on the government. [The Center on Budget and Policy Priorities](#) estimated that nearly half of U.S.-born citizens received one of the benefits included in the 2019 rule in their lifetime. The only two programs that could be relevant in determining whether someone is “likely to become primarily and permanently reliant on the federal government to avoid destitution” are cash assistance under Temporary Assistance for Needy Families (TANF) and Supplemental Security Income (SSI). However, receipt of these programs in itself does not make someone a public charge.
- **Do not consider Medicaid – even for institutional long term care – in a public charge determination.** According to the [Kaiser Family Foundation](#), today in the U.S., one in

three people turning 65 will require nursing home care in their lives, and Medicaid is the primary payer for long-term care in the US, covering six in ten nursing home residents. We should not penalize immigrants for our national policy choices that make Medicaid the only meaningful payer for long-term care and make it difficult to get care at home and force people into institutional care. In addition, including any type of Medicaid benefit will confuse people and lead them to forgo health care.

- **Provide clear guidance on how to predict the likelihood of becoming a public charge based on past or current benefits use.** Without such guidance, predicting who is likely to become a public charge “at any time in the future” is an act of speculation that could allow immigration officers to discriminate. The best way to ensure fairness, consistency, and predictability is to instruct adjudicators to look back at an applicant’s use of certain public benefits for a finite lookback period—such as two or three years—as a way of gauging future likelihood. In addition, the I-485 form and its instructions should make clear that applicants only need to provide information about the use of TANF and SSI during the lookback period.
- **Identify and update a list of the programs that do not count in order to minimize the chilling effect.** The regulation should include language that says, that “benefits other than SSI or TANF shall not be considered in a public charge determination.” In the preamble, the NPRM and final rule should name as many as possible of the other types of cash, tax, food, health, housing, employment, nutrition, education, immigration fee waivers, and other benefits that are *not* included as factors in a public charge test and create guidance where additional/new programs can be added as a reliable resource/reference. The guidance should address COVID-related, other disaster-related benefits such as FEMA, and unemployment insurance benefits in particular; in addition to programs that provide universal basic or guaranteed income to all. The preamble should state that any omission of a program from this list should not be interpreted by adjudicators and community members to mean that it will be counted.
- **Exclude programs funded completely by state, local, tribal and territorial governments.** Clarify that state or local government funded programs—even if they provide cash assistance—are exercises of the powers traditionally reserved to the states and are not counted as factors in a public charge test. We recommend this approach because limiting the benefits that may be considered to *two federal benefits* will be easier for adjudicators to administer and to explain to immigrants and their families than a patchwork of state, local and tribal programs, reducing the chilling effect. It will also be easier for state and local eligibility offices to provide information about recent receipt of TANF, rather than any number of other state or local benefits. States and localities have a compelling interest in promoting health and safety that includes providing benefits at their own expense without barriers caused by federal policies. Since these benefits vary

significantly by state, specifically naming two federal programs that are relevant will make the public charge rule easier for both immigrants and DHS adjudicators to understand.

- **Exclude family members and sponsors' use of benefits.** Make clear that benefits used by an applicant's family members or sponsors do not count as factors in the applicant's public charge test. This is critical in minimizing the chilling effect of the public charge rule on access to benefits by people, including U.S. citizen children, who are not subject to a public charge determination but whose family members may seek LPR status in the future.
- **Exclude any use of benefits by survivors of domestic violence and other serious crimes and by anyone during public emergencies.** Benefits used by survivors of domestic violence or other serious crimes, or used by anyone during natural disasters or other extraordinary circumstances, such as the COVID-19 pandemic or in the aftermath of hurricanes and wildfires, should not be included as factors in a public charge determination. Use of these benefits is due entirely to external events and does not provide any information on the recipient's likelihood of becoming primarily and permanently reliant on government assistance at a future date.
- **Specify that use of benefits as a child or when in an exempt status will not be included in a public charge determination, nor will benefits used when applying for an exempt status, regardless of a person's pathway to legal status.** DHS should propose that benefits received by children—whose long-term economic contributions are generally *bolstered* by childhood receipt of benefits—be excluded from consideration. In addition, benefits received when in an exempt status, such as cash assistance provided to a refugee, should be excluded regardless of a refugee's pathway to legal status. Finally, benefits should be excluded if an individual is applying for an exempt status, for example, if an individual has applied for asylum.

### **Statutory Factors**

DHS should not repeat the mistakes of the 2019 public charge rule by defining the statutory factors in a manner that disproportionately burdens people of color, women and people with disabilities or that creates the opportunity for conscious or implicit bias to affect an individual adjudicators' determinations. For example, the 2019 public charge rule, counted income under 125 percent of the federal poverty level as a "heavily weighted negative factor," which likely would have resulted in an immigration policy that favors white immigrants from Europe rather than Latino, Black, and Asian immigrants from Mexico and Central America, South America, the Caribbean, Asia, or Africa. The Biden administration's January 20, 2021 Executive Order on racial equity requires federal government agencies, including DHS, to promote equitable delivery of

government benefits and equitable opportunities for all. DHS should craft an NPRM that requires adjudicators to:

- **Consider the affidavit of support, when it is required, as creating a presumption that the applicant overcomes the public charge ground of inadmissibility.** DHS should propose that a properly filed affidavit of support satisfies the INA 212(a)(4) requirements and creates a presumption that the applicant overcomes the public charge ground of inadmissibility. This would be consistent with the USCIS adjudicator’s field manual in effect under the 1999 field guidance, which indicated that the affidavit of support’s purpose “is to overcome the public charge ground of inadmissibility.” The current Foreign Affairs Manual instructions also clarify that a properly filed affidavit of support should “normally be considered sufficient” to satisfy the public charge requirement. In addition, the affidavit of support’s legislative history indicates that it is intended to allow the immigrant to be admitted when there would otherwise be a public charge concern. DHS should prohibit immigration officials from questioning the credibility or motives of a sponsor who signs an affidavit of support, looking only to its legal validity. Finally, relying on the affidavit of support to provide a favorable presumption is easier to administer, providing an effective way to apply a fair and transparent decisionmaking tool, and avoiding potential discrimination.
- **If adjudicators identify a circumstance that might make someone likely to meet the definition of a public charge, look to the totality of circumstances to see if there is evidence to overcome the circumstance.** DHS should propose that adjudicators look at all the factors together to see if they would make an applicant likely to become a public charge. If adjudicators identify a circumstance that would serve on its own as a predictor that a person is “likely to become primarily and permanently reliant on the federal government to avoid destitution,” then they should look to the totality of circumstances to see if there is also evidence to *overcome* the circumstance. The judicial and administrative decisions that were used to inform adding the five “totality of circumstances” factors to the statute in 1996 overwhelmingly found immigrants *not* excludable based on one or more of the factors when considering the totality of circumstances. In other words, the five statutory factors and totality of circumstances test were ways to demonstrate that an applicant would *not* be excludable as a public charge and were never intended to be a list of negative and positive factors to be weighed individually in every case. For example, if “financial status” is a concern because the applicant is not working while also in nursing school, but “education and skills” are positive because the applicant is training to become a nurse, on balance the person is not “likely to become primarily and permanently reliant on the federal government to avoid destitution.” DHS should also provide reasonable opportunities for applicants to

address or cure any concerns about the statutory factors, and propose that a properly filed affidavit of support be sufficient to overcome or outweigh any negative factors identified when looking at the factors together.

We urge DHS to move as expeditiously as possible to issue a NPRM and a Final Rule on this topic. The constantly changing public charge policies have led to confusion among many immigrants and their families, contributing to the chilling effect. Publishing a fair and reasonable final rule, as we have recommended here, is the best way to limit this harm.

Sincerely the undersigned,

**Alabama**

Alabama Food Bank Association

**Arizona**

Arizona Center for Economic Progress

Arizona Food Bank Network

Catholic Coalition for Migrant Justice

Uncage & Reunite Families Coalition

William E. Morris Institute for Justice

**Arkansas**

Arkansas Hunger Relief Alliance

**California**

Abrazar, Inc.

Access California Services

ACCESS Reproductive Justice

AHRI Center

Alameda County Community Food Bank

Alliance Medical Center

AltaMed Health Services

American Academy of Pediatrics, California

APLA Health

Apoyo Legal Migrante Asociado ALMA

Asian Health Services

Asian Law Alliance  
Asian Pacific Islander Forward Movement  
Asian Resources, Inc  
Bay Area Legal Aid  
Berkeley Food Network  
Bet Tzedek Legal Services  
Building Skills Partnership  
California American Academy of Pediatrics, Chapter 1  
California American Academy of Pediatrics, Chapter 2  
California Association of Alcohol & Drug Program Executives  
California Association of Food Banks  
California Black Health Network  
The California Endowment  
California Health Care Foundation  
California Immigrant Policy Center  
California Pan-Ethnic Health Network  
California Primary Care Association  
California Rural Legal Assistance Foundation (CRLA Foundation)  
The California Wellness Foundation  
California WIC Association  
Californians Together  
Community Action Partnership of Orange County Food Bank  
Center for Employment Training Immigration and Citizenship Program  
Center for Farmworker Families  
Center of Excellence for Immigrant Child Health and Wellbeing, UCSF Benioff Children's  
Hospitals  
Central American Resource Center - CARECEN- of California  
Central Valley Immigrant Integration Collaborative  
Chicano Federation of San Diego County  
The Children's Partnership  
Clinica Monseñor Oscar A. Romero  
Coalition for Humane Immigrant Rights (CHIRLA)  
Coalition of Orange County Community Health Centers  
Community Clinic Association of Los Angeles County  
Community Clinic Consortium of Contra Costa and Solano  
Community Health Association Inland Southern Region  
Community HousingWorks  
Community Legal Services in East Palo Alto

Compass Family Services  
Comprehensive Community Health Centers  
Contra Costa County Board of Supervisors Dist 3  
Contra Costa Immigrant Rights Alliance  
County Welfare Directors Association of California  
Disability Rights Education & Defense Fund  
East Bay Sanctuary Covenant  
Education and Leadership Foundation  
Empowering Pacific Islander Communities (EPIC)  
Equality California  
Faith In The Valley  
Feeding San Diego  
Food Bank of Contra Costa and Solano  
Food For People  
Food Share of Ventura County  
Foodbank of Santa Barbara County  
GLIDE  
Golden State Opportunity  
Grantmakers Concerned With Immigrants And Refugees  
Great Public Schools Now  
Greater Napa Valley Fair Housing Center  
Immigrant Defenders Law Center  
Indivisible Ventura  
Inland Coalition for Immigrant Justice  
Jewish Family Service LA  
Jewish Family Service of San Diego  
Korean Community Center of the East Bay  
LA Best Babies Network  
La Clínica de La Raza  
La Hermandad Hank Lacayo Family Centers  
La Maestra Family Clinic, Inc.  
Law Foundation of Silicon Valley  
Legal Aid Society of San Mateo County  
Long Beach Immigrant Rights Coalition  
Los Angeles County Office of Education  
Los Angeles Regional Food Bank  
Mainstreet Moms (MMOB) West Marin County, CA  
Marin Community Clinics

Maternal and Child Health Access  
Mixteco Indigena Community Organizing Project (MICOP)  
Neighborhood Legal Services of Los Angeles County  
North County Health Project, Inc. d.b.a. TrueCare  
North East Medical Services (NEMS)  
Northeast Valley Health Corporation  
Nourish California  
Oasis Legal Services  
One Nation Commission  
Open Door Community Health Centers  
Operation Access  
Orange County Labor Federation, AFL-CIO  
Pars Equality Center  
PICO California  
Public Health Justice Collective  
PUENTE Learning Center  
Raizes Collective  
Redwood Community Health Coalition  
Redwood Empire Food Bank  
San Diego Hunger Coalition  
San Diego Immigrant Rights Consortium  
San Diego Organizing Project (SDOP)  
San Francisco-Marin Food Bank  
Second Harvest Food Bank Orange County  
Second Harvest of Silicon Valley  
South Asian Network  
South Bay People Power  
St. John's Well Child and Family Center  
Sycamores  
Team Hope  
TODEC Legal Center  
The Women's Building  
UCSF Health and Human Rights Initiative  
Unified US Deported Veterans Resource Center / VFP  
Universal Income Project  
Venice Family Clinic  
Vital Immigrant Defense Advocacy and Services  
WECAN Foundation

West County Health Centers  
Western Center on Law & Poverty

**Colorado**

Clayton Early Learning  
COLOR Action Fund  
The Colorado Blueprint to End Hunger  
Colorado Center on Law and Policy  
Colorado Children's Campaign  
Colorado Covering Kids and Families  
Colorado Fiscal Institute  
Colorado Immigrant Rights Coalition  
Colorado Latino Leadership Advocacy and Research Organization  
The Consortium  
Food Bank for Larimer County  
Food Bank of the Rockies  
GoFarm  
Hunger Free Colorado  
Metro Caring  
Nourish Colorado  
PASCO  
Tri-County Health Department  
UpRoot Colorado

**Connecticut**

Building One Community  
Connecticut Foodshare  
Connecticut Legal Services  
Connecticut Shoreline Indivisible  
CT Students for a Dream  
Greater Hartford Legal Aid  
Hartford Deportation Defense  
Khmer Health Advocates  
New Haven Legal Assistance Association  
Stratford United Methodist Church  
Universal Health Care Foundation of Connecticut

**Delaware**

Community Legal Aid Society, Inc.

**District of Columbia**

D. C. Hunger Solutions

DC Health Benefit Exchange Authority

La Clínica Del Pueblo

Legal Aid Society of the District of Columbia

RESULTS DC/MD

**Florida**

American Children's Campaign

Florida Chapter of the American Academy of Pediatrics

Florida Health Justice Project

Florida Policy Institute

Hispanic Unity of Florida

**Georgia**

Center For Pan Asian Community Services

Georgia Food Bank Association

Georgians for a Healthy Future

SisterLove

Voices for Georgia's Children

Women Watch Afrika, Inc.

**Hawaii**

Hawaii Children's Action Network

Hawaii Children's Action Network Speaks!

Hawaii Health and Harm Reduction Center

Hep Free Hawaii

Lana'i Community Health Center

**Idaho**

Centro de Comunidad y Justicia

The Idaho Foodbank

**Illinois**

Access Living of Metropolitan Chicago

ACT Now  
AIDS Foundation Chicago  
Ann and Robert H. Lurie Children's Hospital of Chicago-Uptown  
Catholic Charities of the Archdiocese of Chicago  
Chicago Citywide Literacy Coalition  
Chicago Religious Leadership Network  
Coalition for Immigrant Mental Health  
Cook County Health  
Enlace Chicago  
Erie Family Health Centers  
Esperanza Health Centers  
EverThrive Illinois  
Fox Valley Citizens for Peace & Justice  
Housing Action Illinois  
Interfaith Community for Detained Immigrants  
Illinois Hunger Coalition  
Illinois Public Health Institute  
Lawyer's Committee for Better Housing  
Legal Aid Society of Metropolitan Family Services  
Legal Council for Health Justice  
Lurie Children's Hospital  
National Coalition for Latinxs with Disabilities  
P.A.S.O West Suburban Action Project  
Southwest Organizing Project SWOP  
University YMCA  
University YMCA New American Welcome Center

### **Indiana**

Fair Housing Center of Central Indiana, Inc.  
Feeding Indiana's Hungry  
Immigrant Welcome Center  
Indiana Institute for Working Families  
Indiana Justice Project  
Indy Hunger Network  
Marion County Commission on Youth, Inc. (MCCOY)

### **Iowa**

Center for Worker Justice

Common Good Iowa

**Kansas**

El Centro Inc.

Kansas Action for Children

**Kentucky**

Kentucky Equal Justice Center

Kentucky Voices for Health

**Louisiana**

Louisiana Advocates for Immigrants in Detention

Louisiana Budget Project

Louisiana Partnership for Children and Families

**Maine**

Congregation Bet Ha'am

Gateway Community Services Maine

Immigrant Legal Advocacy Project

Maine Business Immigration Coalition

Maine Equal Justice

Maine Immigrants Rights Coalition

Maine Multicultural Center

Maine Primary Care Association

Preble Street Maine Hunger Initiative

Welcoming the Stranger

**Maryland**

CASA

Catholic Legal Immigration Network, Inc.

Community Support Services, Inc.

Direct Support for Immigrants

Jubilee Association of Maryland

Maryland Hunger Solutions

The Parents' Place of MD

Public Justice Center

SEEC

Takoma Park Mobilization

## **Massachusetts**

Ascentria Care Alliance, Immigration Legal Assistance Program  
Boston Area Rape Crisis Center  
Boston Medical Center  
Boston University Immigrants' Rights and Human Trafficking Program  
Cambridge Health Alliance  
Catholic Charities Boston  
Catholic Social Services  
Central West Justice Center  
Charles River Community Health  
Children's HealthWatch  
Children's Law Center of Massachusetts  
Community Action Agency of Somerville, Inc.  
Community Economic Development Center  
Conference of Boston Teaching Hospitals  
Dana-Farber Cancer Institute  
De Novo Center for Justice and Healing  
DOVE (DOMestic Violence Ended), Inc.  
Essex County Community Organization (ECCO)  
The Food Bank of Western Massachusetts  
The Greater Boston Food Bank  
Greater Boston Legal Services  
Greater Lawrence Community Action Council  
Haitian-Americans United, Inc.  
Harbor Health Services Inc  
Healing Abuse Working for Change  
Health Care For All  
Health Law Advocates  
Jewish Family & Children's Service Greater Boston  
Justice Center of Southeast Massachusetts  
JVS Boston  
Lynn Community Health Center  
Mass General Brigham  
Massachusetts Advocates for Children  
Massachusetts Coalition for the Homeless  
Massachusetts Councils on Aging  
Massachusetts Immigrant and Refugee Advocacy Coalition

Massachusetts Law Reform Institute  
Massachusetts Senior Action Council  
Maverick Landing Community Services  
MetroWest Legal Services  
Northeast Justice Center  
Northeastern University School of Law Immigrant Justice Clinic  
Political Asylum Immigration Representation (PAIR) Project  
Project Bread  
The Right to Immigration Institute  
The Second Step  
South Cove Community Health Center  
Stavros  
True Alliance Center, Inc.  
UMass Memorial Health  
United Way of Massachusetts Bay and Merrimack Valley  
Wellforce  
Worcester County Food Bank, Inc.

## **Michigan**

18 Million Rising  
African Bureau of Immigration and Social Affairs (ABISA)  
ACCESS  
ACLU of Michigan  
Berrien Immigrant Solidarity Network  
Caribbean Community Service Center (CCSC)  
Center for Civil Justice  
Congress of Communities  
Detroit Hispanic Development Corporation  
El Concilio/Hispanic American Council Inc  
Food Gatherers  
Justice for Our Neighbors Michigan  
MI ALMA  
Michigan Coalition to End Domestic & Sexual Violence  
Michigan Department of Civil Rights  
Michigan Immigrant Rights Center  
Michigan League for Public Policy  
Noor's Heaven of West Michigan Services جمعية جنة نور الخيرية  
Southwest Detroit Immigrant and Refugee Center

Strangers No Longer  
United Way of Washtenaw County  
University of Detroit Mercy Law Immigration Clinic  
Voces  
Washtenaw Food Policy Council  
Washtenaw Health Plan  
Washtenaw Housing Alliance  
Washtenaw Interfaith Coalition for Immigrant Rights

### **Minnesota**

The Aliveness Project  
Comunidades Latinas Unidas en Servicio  
Fasting For Friends  
The Food Group  
Health Access MN  
Hennepin County  
Hennepin Healthcare System  
Hunger Solutions Minnesota  
Immigrant Law Center of Minnesota  
Jewish Family and Children's Service of Minneapolis  
Legal Services Advocacy Project  
Mid Minnesota Legal Aid  
Minnesota Budget Project  
Neighborhood House  
Second Harvest Heartland  
TakeAction Minnesota  
Twin Cities Medical Society

### **Mississippi**

El Pueblo  
Mississippi Center for Justice  
Mississippi Immigrants Rights Alliance

### **Missouri**

Legal Services of Eastern Missouri

### **Nebraska**

Nebraska Appleseed

**Nevada**

Children's Advocacy Alliance  
Food Bank of Northern Nevada  
Nevada Chapter, American Academy of Pediatrics  
Nevada Free Taxes Coalition  
Silver State Equality  
Three Square Food Bank

**New Hampshire**

NH Legal Assistance

**New Jersey**

Disability Rights New Jersey  
Latino Action Network Foundation  
Legal Services of New Jersey  
New Jersey Citizen Action  
New Jersey Policy Perspective

**New Mexico**

New Mexico Center on Law and Poverty  
New Mexico Voices for Children

**New York**

Academy of Medical & Public Health Services  
African Services Committee  
Arab-American Family Support Center  
Care For the Homeless  
Catholic Charities Community Services, NY / Immigrant and Refugee Services  
Center for the Integration and Advancement of New Americans, Inc. (CIANA)  
Chhaya Community Development Corporation  
Chinese-American Planning Council (CPC)  
Coalition for Asian American Children and Families  
Committee for Hispanic Children & Families (CHCF)  
Community Service Society of New York  
Emerald Isle Immigration Center  
Empire Justice Center  
Families for Freedom

Garra - Cidadão Global, Global Citizen, Inc.  
Health Care For All New York  
Henry Street Settlement  
India Home  
International Refugee Assistance Project (IRAP)  
Japanese American Social Services, Inc. (JASSI)  
LAAL  
LatinoJustice PRLDEF  
The Legal Aid Society  
The Legal Project  
Make the Road New York  
MinKwon Center for Community Action  
New York Immigration Coalition  
New York Justice for Our Neighbors, Inc.  
New York Lawyers for the Public Interest  
Urban Health Plan's Plaza del Sol Family Health Center  
Sakhi for South Asian Women  
Saratoga Immigration Coalition  
South Asian Youth Action

### **North Carolina**

Charlotte Center for Legal Advocacy  
El Vínculo Hispano / Hispanic Liaison  
NC Child  
North Carolina Justice Center  
Student Action with Farmworkers

### **Ohio**

Advocates for Basic Legal Equality, Inc. (ABLE)  
Advocating Opportunity  
Legal Aid Society of Cleveland  
Legal Aid Society of Columbus  
Mid-Ohio Food Collective

### **Oklahoma**

Community food Bank of Eastern Oklahoma  
Immigration Center at Western Oaks  
Oklahoma Policy Institute

Regional Food Bank of Oklahoma  
Vision Weavers Consulting, LLC

**Oregon**

Oregon Center for Public Policy  
Oregon Food Bank  
Our Children Oregon  
Partners for a Hunger-Free Oregon

**Pennsylvania**

Casa San Jose  
Community Justice Project  
Community Legal Services of Philadelphia  
Greater Philadelphia Coalition Against Hunger  
HIAS and Council Migration Services of Philadelphia DBA HIAS PA  
Just Harvest  
Nationalities Service Center  
Pennsylvania Council of Churches  
Pennsylvania Health Access Network  
Pennsylvania Health Law Project  
Philadelphia Health Partnership

**Rhode Island**

The Economic Progress Institute  
Immigrant Coalition of Rhode Island  
Protect Our Healthcare Coalition RI  
Rhode Island Community Food Bank  
Rhode Island Health Center Association

**South Carolina**

Center for Community Health Alignment  
S.C. Appleseed Legal Justice Center  
South Carolina Chapter of the American Academy of Pediatrics

**Tennessee**

Tennessee Immigrant & Refugee Rights Coalition  
Tennessee Justice Center

**Texas**

Border Network for Human Rights  
Children at Risk  
Community for Children, Inc.  
Daya Inc.  
Every Texan  
Feeding Texas (Texas Food Bank Network)  
FIND Food Bank  
Food Bank of the Rio Grande Valley, Inc.  
Harris Health System  
The Health Collaborative  
Houston Food Bank  
Houston Immigration Legal Services Collaborative  
Human Rights Initiative of North Texas  
International Valley Health Institute  
Justice for Our Neighbors El Paso  
La Fe Policy Research and Education Center  
Mayor's Office, City of Houston  
Opening Doors International Services  
Puentes de Cristo  
Proyecto Azteca  
Proyecto Juan Diego Inc.,  
RITA-Reform Immigration for Texas Alliance  
San Antonio Food Bank  
Texas Parent to Parent  
VELA  
Woori Juntos

**Utah**

University of Utah Health Plans  
Utah Health Policy Project  
Utahns Against Hunger  
Voices for Utah Children

**Vermont**

The Office of the Health Care Advocate, Vermont Legal Aid

**Virginia**

ACLU People Power Fairfax  
Legal Aid Justice Center  
Virginia Poverty Law Center

### **Washington**

Anti-Hunger & Nutrition Coalition  
City of Seattle Office of Immigrant and Refugee Affairs  
Columbia Legal Services  
Community Health Network of Washington  
Community Health Plan of Washington  
Entre Hermanos  
Hispanic Business/Professional Association  
International Community Health Services  
Islamic Civic Engagement Project  
Kitsap Immigrant Assistance Center  
Legal Voice  
Northwest Harvest  
Northwest Health Law Advocates  
Northwest Immigrant Rights Project  
Northwest Regional Primary Care Association  
OneAmerica  
Pacific Islander Community Association of WA  
Planned Parenthood Of Greater Washington Of North Idaho  
Sea Mar Community Health Centers  
Seattle Immigrant Rights Action Group  
Shearwater Law PLLC  
Spokane Immigrant Rights Coalition  
Tri-Cities Community Health  
Washington State Department of Social and Health Services

### **West Virginia**

West Virginians for Affordable Health Care  
West Virginia Health Care for All  
West Virginia Center on Budget and Policy

### **Wisconsin**

Feeding America Eastern Wisconsin  
Hunger Task Force

Kids Forward

## **Wyoming**

Immigrant Hope - Wyoming Idaho

## **National**

ACA Consumer Advocacy

Advocates for Better Children's Diets

African Communities Together

AFL-CIO

AIDS Alliance for Women, Infants, Children, Youth & Families

Alianza Nacional de Campesinas

America's Essential Hospitals

American Academy of Pediatrics

American College of Physicians

American Federation of State, County and Municipal Employees (AFSCME)

American Federation of Teachers

American Immigration Council

American Immigration Lawyers Association

American Public Health Association

Asian & Pacific Islander American Health Forum (APIAHF)

Asian American Legal Defense and Education Fund (AALDEF)

Asian Pacific American Labor Alliance, AFL-CIO

Asian Pacific Institute on Gender-Based Violence

Association of Asian Pacific Community Health Organizations (AAPCHO)

Association of Farmworker Opportunity Programs

Be a Hero Fund

Bread for the World

Center for American Progress

Center for Gender & Refugee Studies

Center for Health Law and Policy Innovation of Harvard Law School

Center for Law and Social Policy (CLASP)

Center for Science in the Public Interest

Center for the Study of Social Policy

Center for Victims of Torture

Children's Defense Fund

Christian Reformed Church Office of Social Justice

Church World Service

Coalition on Human Needs  
Community Catalyst  
The Coelho Center for Disability Law, Policy and Innovation  
Disciples Refugee & Immigration Ministries  
Economic Mobility Pathways (EMPath)  
Evelyn and Walter Haas, Jr. Fund  
Faith in Action  
Faith in Public Life  
Families USA  
Family Voices  
Farmworker Justice  
Feeding America  
First Focus on Children  
Food Research & Action Center  
Franciscan Action Network  
Freedom Network USA  
Futures Without Violence  
Georgetown Center on Poverty and Inequality  
Georgetown University Center for Children and Families  
The Gerontological Society of America  
Guttmacher Institute  
Hispanic Federation  
Holy Spirit Missionary Sisters, USA-JPIC  
ideas42  
Immigrant Legal Resource Center  
Immigration Hub  
Justice in Aging  
Kids in Need of Defense (KIND)  
League of Women Voters of the United States  
The Leukemia & Lymphoma Society  
Lutheran Immigration and Refugee Service  
Maryknoll Office for Global Concerns  
MAZON: A Jewish Response to Hunger  
Migrant Clinicians Network  
MLPB, a fiscally sponsored program of TSNE MissionWorks  
MomsRising/MamásConPoder  
National Alliance of State & Territorial AIDS Directors (NASTAD)  
National Association for Children's Behavioral Health

National Association of Councils on Developmental Disabilities  
National Association for the Education of Young Children  
National Association of Pediatric Nurse Practitioners  
National Center for Law and Economic Justice  
National Community Action Partnership  
National Consumers League  
National Council of Asian Pacific Americans  
National Council of Jewish Women  
National Council on Aging  
National Domestic Workers Alliance  
National Education Association  
National Employment Law Project  
National Family Planning & Reproductive Health Association  
National Health Law Program  
National Hispanic Medical Association  
National Housing Law Project  
National Immigration Law Center  
National Immigration Litigation Alliance  
National Justice for Our Neighbors  
National Latina Institute for Reproductive Justice  
National Low Income Housing Coalition  
National Network for Arab American Communities (NNAAC)  
National Network for Immigrant and Refugee Rights  
National Partnership for Women & Families  
National Women's Law Center  
National Working Positive Coalition  
NETWORK Lobby for Catholic Social Justice  
Network of Jewish Human Service Agencies  
ParentsTogether Action  
Partnership for America's Children  
Physicians for Reproductive Health  
PIVOT - Progressive Vietnamese American Organization  
Planned Parenthood Federation of America  
PolicyLab, Children's Hospital of Philadelphia  
Positive Women's Network-USA  
Presidents' Alliance on Higher Education and Immigration  
Prevention Institute  
Prosperity Now

Provincial Council Clerics of St. Viator  
Refugee and Immigrant Center for Education and Legal Services (RAICES)

#### RESULTS

Save the Children  
Service Employees International Union (SEIU)  
Shriver Center on Poverty Law  
Sisters of Mercy of the Americas Justice Team  
Social Security Works  
South Asian Americans Leading Together  
Start Early  
Student Clinic for Immigrant Justice, Inc.  
Treatment Action Group  
UndocuBlack  
UnidosUS  
Union for Reform Judaism  
United Parent Leaders Action Network (UPLAN)  
URGE: Unite for Reproductive & Gender Equity  
Witness at the Border  
The Workers Circle  
World Education, Inc.  
Young Center for Immigrant Children's Rights  
Young Invincibles