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April 25, 2022

Samantha Deshommes, Chief  
Regulatory Coordination Division, Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security

*Re: DHS Docket No. USCIS-2021-0013, Comments in Response to Proposed Rulemaking, Public Charge Ground of Inadmissibility*

The undersigned 1,071 national, state and local organizations in every state in the country and the District of Columbia are writing to share our support for, as well as recommendations to improve on, the public charge notice of proposed rulemaking (NPRM) published in the Federal Register on February 24, 2022.

Safety net programs for health, nutrition, housing, and other basic needs help nearly half of Americans to make ends meet at some point in their lifetime. In an economy where, for millions, working full-time isn't enough to pay the rent, take the children to the doctor, or put food on the table, getting help doesn't make a person – citizen or not – a public charge. It makes them part of a typical family.

The public charge ground of inadmissibility is an antiquated policy reflecting centuries of racial and class bias. We are committed to working with Congress to strike it from the law. We also recognize, however, that at present it remains a provision of the Immigration and Nationality Act (INA), and the Department of Homeland Security (DHS) must administer the law. To that end, we urge DHS to move quickly to improve and finalize the proposed rule.

Finalizing a responsible public charge policy is critical to ensuring that immigrants who qualify for safety net programs can be confident that seeking health care, food and nutrition assistance, housing or other help will not put future immigration applications at risk. This proposed rule is an important step mitigating the damage of the 2019 public charge policy.

The proposed regulation restores and improves upon the public charge policy that was in use from the late-1990s through the late 2010s, and that was consistent with longstanding public charge policy. Importantly, the NPRM recognizes that use of core health, nutrition, and housing assistance programs should in no way be linked to the INA's public charge provision. They represent our country's policy choices about how to help all workers and families succeed. This is a common sense foundation on which to build.

We commend DHS for proposing significant improvements to the 1999 guidance. These improvements – especially proposed definitions and instructions for adjudicating officers – will reduce the bias and harm resulting from the application of the INA's public charge provision.

"Primarily dependent" is the appropriate standard for a public charge determination and we support its use. We also recommend that if a person uses any programs considered in a public charge determination to overcome hardships caused by a temporary situation, that use should not be considered an indication of primary dependence. Examples include the use of such programs by survivors of domestic violence, serious crimes, disasters, accidents, or by children, pregnant or recently pregnant persons. Similarly, we support DHS's proposal to clarify that an individual's use of safety net programs while in an exempt immigration status will not be considered.

The proposed rule also improves on the 1999 guidance by defining "receipt" of safety net benefits for the purpose of public charge determinations. Under the proposal, applying for benefits, being approved for benefits in the future, assisting another to apply for benefits, or being in a household or family with someone who receives benefits does not count as receipt of benefits. This reform is crucial to ensure the administrability of the public charge rule and to mitigate the "chilling effect" of the 2019 public charge policy, especially on U.S. citizen children in mixed-status households.

We support DHS's decision not to define the five statutory factors described in the INA: the applicant's age; health; family status; assets, resources, and financial status; and education and skills. We support the rule's favorable consideration of the affidavit of support. We recommend that, consistent with longstanding Department of State instructions, a valid affidavit of support be deemed sufficient to overcome a public charge test, unless "significant public charge factors" are present, under the totality of the circumstances. Placing a focus on the affidavit of support to mitigate issues arising under the statutory factors is the most administrable approach. Defining the statutory factors would necessarily result in far more complexity and discretion, unnecessarily adding administrative burdens and opening the door to bias. In addition, we recommend that DHS retain the proposed language regarding the term "totality of the circumstances," where no one factor other than an insufficient affidavit of support, if required, should be the sole criterion for determining whether an applicant is likely to become a public charge.

We also support the enumeration of 29 categories of immigrants—beginning with refugees and asylees and ending with Syrian nationals under the Syrian Adjustment Act and others exempt under federal law—to whom the public charge ground of inadmissibility does not apply. We also urge that DHS update the USCIS policy manual to reflect any additional exempt groups. Such a comprehensive and responsive list can simplify communications and reduce the chilling effect against use of benefits for those who are clearly exempt.

However, the proposed rule falls short in several key areas and must be strengthened. The improvements detailed below are critical to ensure an equitable public charge rule consistent with President Biden's direction that DHS and other federal agencies eliminate "barriers that prevent immigrants from accessing government services available to them."

The only two programs that should be relevant in determining whether a person is “likely at any time to become primarily dependent on the government for subsistence” are Supplemental Security Income (SSI) and Temporary Assistance for Needy Families program (TANF) cash assistance (non-cash services and short term benefits under TANF should not be considered as cash assistance). The Immigration and Naturalization Service’s 1999 Field Guidance indicated that both of these programs should be considered in a public charge determination and in a 2022 letter to DHS, the U.S. Department of Health & Human Services agreed. Consideration of an applicant’s use of these programs should be qualified in two essential ways. First, the rule should make clear that receipt of SSI or TANF will not automatically result in a public charge determination, but will simply be considered along with other factors in the totality of the circumstances. Second, only the applicant’s current use of SSI or TANF should be considered—a person who has received benefits in the past but is not currently using benefits has had a change in circumstances that may make them unlikely to need safety net programs in the future. Past use of benefits should not be considered in public charge determinations.

No other benefits should be considered as part of the public charge determination. Specifically, we urge DHS to revise the proposed rule to exclude:

- State, Tribal, territorial, or local safety net programs, including programs providing cash assistance for income maintenance. DHS should define cash assistance as limited exclusively to cash assistance for income maintenance under the two federal cash assistance programs (TANF or SSI) and exclude all other programs, including state, Tribal, territorial, or local programs. Failure to exclude all non-federal programs, including cash assistance programs, would undermine states’ efforts to mitigate social problems and inequity, as well as complicate messages about the policy, undermining nationwide efforts to combat the persistent chilling effect.
- Long-term institutionalization at government expense. Allowing any type of Medicaid coverage to be considered in a public charge determination causes confusion and perpetuates the chilling effect caused by the 2019 public charge rule. It also discriminates against people with disabilities and older adults because only people with disabilities and older adults experience long-term institutionalization. If federal long-term institutionalization is considered in a public charge determination, DHS should clarify that state, Tribal, territorial or locally funded institutionalization is excluded.

DHS should strengthen the scope of protection for vulnerable immigrants such as VAWA self-petitioners, qualified battered immigrants, and individuals who have applied for or obtained U or T status, by adding language clarifying that, consistent with the statute, they are exempt from a public charge determination, regardless of their pathway to adjustment of status.

We appreciate DHS’s invitation to provide input on “how to communicate to parents of U.S. citizen children that the receipt of benefits by such children would not be considered part of the public charge inadmissibility determination for the parents.” We recommend the inclusion of a non-exclusive list of exempted benefits within the text of the regulations. Beyond the rule itself, a broad, government-wide outreach and engagement campaign would be the most effective

way to meet DHS's goals, especially its stated desire to limit the negative effects of public charge policy on children, including children in mixed-status households. Materials and messages developed for the campaign should be multilingual and include a clear statement that benefits used by a child or other person in the applicant's household would not be treated as received by the applicant. This would be accomplished most effectively in partnership with states, cities and community-based organizations.

The social and economic consequences of the COVID-19 pandemic demonstrate why the final public charge regulation must be crystal clear. The complicated and confusing nature of the 2019 public charge policy significantly increased the damage it did to the nation. For example, it deterred immigrant families from applying for not only Medicaid and SNAP, which could be considered in public charge determinations under the 2019 regulation, but also CHIP and WIC, which remained excluded. This policy not only deterred eligible immigrants from using safety net programs, it has also deterred U.S. citizens in immigrant families from getting the health care and help they need during the pandemic. To eliminate "barriers that prevent immigrants from accessing government services available to them," DHS's final regulation must be clear and easy to explain.

For more information about this comment, contact Adriana Cadena, Director of the Protecting Immigrant Families Coalition, at [cadena@nilc.org](mailto:cadena@nilc.org).

The changes described above are critical in encouraging millions of persons in immigrant families to get the help and care they need, so they can power the pandemic recovery and build a healthier, stronger future for the United States. We urge DHS to act quickly to issue a final rule that makes these essential improvements.

### **National organizations**

Advocates for Youth  
Advocating Opportunity  
African Communities Together  
Africom  
AIDS United  
American Academy of Pediatrics  
American Academy of Pediatrics, Utah Chapter  
American College of Obstetricians and Gynecologists  
American College of Physicians  
American Geriatrics Society  
American Muslim Health Professionals  
American Psychiatric Association  
American Public Health Association  
America's Voice

Asian & Pacific Islander American Health Forum (APIAHF)  
Asian American Legal Defense and Education Fund (AALDEF)  
Asian Americans Advancing Justice | AAJC  
Asian and Pacific Islander Caucus for Public Health (APIC)  
Asian Pacific American Labor Alliance, AFL-CIO  
Asian Pacific Institute on Gender-Based Violence  
Association of Asian Pacific Community Health Organizations (AAPCHO)  
Association of Maternal & Child Health Programs  
Association of Nurses in AIDS Care  
Autistic Self Advocacy Network  
Be a Hero  
Big Cities Health Coalition  
Binational Institute of Human Development  
BORDER ANGELS  
Border Network for Human Rights  
Brown Beret Revolutionary Cadre Organization  
CASA  
Catholic Legal Immigration Network, Inc.  
Catholic Social Services  
Center for American Progress  
Center for Gender & Refugee Studies  
Center for Law and Social Policy (CLASP)  
Center for LGBTQ Economic Advancement & Research (CLEAR)  
Center for Medicare Advocacy  
Center for Science in the Public Interest  
Center for the Study of Social Policy  
Center for Victims of Torture  
CenterLink: The Community of LGBT Centers  
Children's Defense Fund  
Church World Service  
Coalition of Irish Immigration Centers  
Coalition on Human Needs  
CommonSpirit Health  
Community Catalyst  
Community Change Action  
Community for Children, Inc.  
Community Health for Asian Americans  
Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces  
Dare

Doctors for America  
Educare Learning Network  
El Centro Hispano  
Empowering Pacific Islander Communities  
Esperanza United  
Fair Immigration Reform Movement (FIRM) Action  
Families Belong Together  
Families USA  
Family Voices  
Farmworker Justice  
Feeding America  
First Focus on Children  
Food Research & Action Center  
Freedom Network USA  
Futures Without Violence  
Georgetown University Center for Children and Families  
GLMA: Health Professionals Advancing LGBTQ Equality  
Grantmakers Concerned with Immigrants and Refugees  
Hispanic American Community Education & Services  
Hispanic Federation  
Holy Spirit Missionary Sisters, USA-JPIC  
Human Rights Watch  
ideas42  
IDRA (Intercultural Development Research Association)  
Immigrant Legal Resource Center (ILRC)  
Immigration Hub  
Immigration Research Initiative  
ImmSchools  
International Rescue Committee  
Ipas Partners for Reproductive Justice  
Japanese American Citizens League  
Jobs With Justice  
Just Neighbors Ministry  
Justice for Migrant Women  
Justice in Aging  
Juvenile Law Center  
Kids in Need of Defense (KIND)  
Latino Commission on AIDS  
Legal Action Center

Loving Hands for the Needy, Inc  
Lutheran Immigration and Refugee Service  
MAZON: A Jewish Response to Hunger  
Medicare Rights Center  
Mi Familia Vota  
MomsRising  
Mother And Child Alliance  
NARAL Pro-Choice America  
NASTAD  
National Adult Day Services Association (NADSA)  
National Advocacy Center of the Sisters of the Good Shepherd  
National Asian Pacific American Women's Forum (NAPAWF)  
National Association for Hispanic Elderly  
National Association for Home Care & Hospice  
National Association for the Education of Young Children  
National Association of Pediatric Nurse Practitioners  
National Association of Social Workers  
National Birth Equity Collaborative  
National Center for Law and Economic Justice  
National Center for Lesbian Rights  
National Center for Medical-Legal Partnership  
National Center for Transgender Equality  
National Coalition for Latinxs with Disabilities (CNLD)  
National Coalition for the Homeless  
National Community Action Partnership  
National Consumer Law Center (on behalf of its low-income clients)  
National Council of Asian Pacific Americans  
National Council of Jewish Women  
National Council on Aging  
National Domestic Workers Alliance  
National Employment Law Project  
National Family Planning & Reproductive Health Association  
National Federation of Filipino American Associations  
National Head Start Association  
National Health Law Program  
National Homelessness Law Center  
National Housing Law Project  
National Immigrant Justice Center  
National Immigration Law Center

National Justice for Our Neighbors  
National Latina Institute for Reproductive Justice  
National Low Income Housing Coalition  
National Network for Arab American Communities (NNAAC)  
National Organization of API Ending Sexual Violence  
National Organization of Social Security Claimants' Representatives (NOSSCR)  
National Partnership for Women & Families  
National Tuberculosis Controllers Association (NTCA)  
National WIC Association  
National Working Positive Coalition  
Network Lobby for Catholic Social Justice  
Network of Jewish Human Service Agencies  
NYU Center for the Study of Asian American Health (CSAAH)  
Partnership for America's Children  
PHI  
Physicians for Reproductive Health  
Planned Parenthood Federation of America  
Polygon Education Fund  
Positive Women's Network-USA  
Pre-Health Dreamers  
Presidents' Alliance on Higher Education and Immigration  
Prevention Institute  
Public Good Law Center  
Refugee Congress  
RespectAbility  
RESULTS  
Salva  
School Social Work Association of America  
Service Employees International Union (SEIU)  
Share Our Strength  
Shriver Center on Poverty Law  
Sister Parish Inc.  
Sisters of Charity of Nazareth Congregational Leadership  
South Asian SOAR  
Southeast Asia Resource Action Center (SEARAC)  
SPLC Action Fund  
Start Early  
The AIDS Institute



The Gerontological Society of America  
The Leadership Conference on Civil and Human Rights  
The Sunita Jain Anti-Trafficking Initiative at LMU Loyola Law School  
The Workers Circle  
The Young Center for Immigrant Children's Rights  
UndocuBlack Network  
UnidosUS  
Union for Reform Judaism  
Unitarian Universalist Association  
Unitarian Universalist Refugee & Immigrant Services & Education  
Unitarian Universalists for Social Justice  
United Parent Leaders Action Network (UPLAN)  
United We Dream  
URGE: Unite for Reproductive & Gender Equity  
Young Invincibles  
ZERO TO THREE

### **State organizations**

#### **Alabama**

¡HICA! Hispanic Interest Coalition of Alabama  
Adelante Alabama Worker Center  
Alabama Arise  
Alabama Coalition for Immigrant Justice  
Alabama Institute for Social Justice  
Faith in Action Alabama  
Feeding Alabama  
Greater Birmingham Ministries

#### **Alaska**

Alaska Children's Trust  
Alaska Food Policy Council  
Alaska Literacy Program  
Alaska PIRG  
Bread Line, Inc.  
Calypso Farm and Ecology Center  
Food Bank of Alaska, Inc.  
Native Village of White Mountain

## **Arizona**

Arizona Center for Economic Progress  
Arizona Dream Act Coalition  
Arizona Food Bank Network  
Arizona Housing Coalition  
Children's Action Alliance  
PLAN Phoenix  
William E. Morris Institute for Justice

## **Arkansas**

Arkansas Appleseed Legal Justice Center  
Arkansas Coalition of Marshallese  
Arkansas Hunger Relief Alliance  
Arkansas Immigrant Defense  
El Centro Hispano (Arkansas)

## **California**

AHRI Center  
Alexandria House  
Alianza Sacramento  
AltaMed Health Services  
American Academy of Pediatrics - Orange County Chapter  
American Academy of Pediatrics California Chapter 2  
American Academy of Pediatrics, CA Chapter 3  
API Equality-LA  
APLA Health  
Asian Law Alliance  
Asian Pacific Islander Forward Movement  
Asian Resources, Inc  
Bay Area Legal Aid  
Berkeley Food Network  
Bienestar  
Buen Vecino  
California Association of Food Banks  
California Housing Partnership  
California Immigrant Policy Center

California Institute for Rural Studies  
California Pan-Ethnic Health Network  
California Primary Care Association  
California Rural Legal Assistance Foundation  
California WIC Association  
Canal Alliance  
CAP OC/OC Food Bank  
Casa Familiar  
Center for Asian Americans in Action  
Center for Community Action and Environmental Justice CCAEJ  
Central California Food Bank  
Central City Neighborhood Partners  
Central Valley Immigrant Integration Collaborative  
Centro del Inmigrante  
Centro Laboral de Graton  
Centro Legal de la Raza  
Children Now  
Chinese for Affirmative Action  
Chispa  
Clinica Monseñor Oscar A. Romero  
Coachella Valley Immigrant Dignity Coalition  
Coalition for Humane Immigrant Rights (CHIRLA)  
COFECA  
Community Action Partnership of Kern  
Community Clinic Association of Los Angeles County  
Comunidad de Apoyo San Diego  
Coordinadora San Romero  
County Welfare Directors Association of California  
DAP Health  
Disability Rights California  
East Bay Sanctuary Covenant  
El Cajon Collaborative  
Employee Rights Center  
Equality California  
Essential Access Health  
Eudcation Leadership Foundation  
Feeding San Diego  
FIND Food Bank  
First 5 Alameda County

First 5 LA  
Food Bank of Contra Costa and Solano  
Food for People, the Food Bank for Humboldt County  
Food Share of Ventura County  
Give for a Smile  
GLIDE  
Golden State Opportunity  
Health Access California  
Healthy House Within A MATCH Coalition  
Human Impact Partners  
Humboldt Area Center for Harm Reduction  
Hunger Action Los Angeles  
Immigrant Defenders Law Center  
Immigration Center for Women and Children  
Immigration Institute of the Bay Area  
Indian Association of Sacramento  
Indivisible CA: StateStrong  
Indivisible Ventura  
Inland Coalition for Immigrant Justice  
Inland Equity Partnership  
Inner City Law Center  
Instituto de Educacion Popular del Sur de California  
Integrated Community Collaborative  
Interfaith Movement for Human Integrity  
Jakara Movement  
Jewish Family Service of Los Angeles  
Jewish Family Service of San Diego  
Jubilee Immigration Advocates  
Justice For All Ventura County  
JVS SoCal  
Korean Community Center of the East Bay  
L.A.U.R.A. (Life After Uncivil Ruthless Acts)  
LA Best Babies Network  
La Hermandad Hank Lacayo Youth & Family Center - OXNARD  
La Raza Centro Legal, San Francisco  
LALMA  
Latino and Latina Roundtable  
Legal Aid Society of San Mateo County  
Legal Assistance for Seniors

Long Beach Immigrant Rights Colaition  
Los Angeles Regional Food Bank  
Maternal and Child Health Access  
Metro Caring  
Mixteco Indigena Community Organizing Project (MICOP)  
Multi-faith ACTION Coalition  
National Association of Social Workers (NASW) California Chapter  
Neighborhood Legal Services of Los Angeles County  
Nevada County Citizens for Choice  
NorCal Resist  
North East Medical Services (NEMS)  
North Marin Community Services  
Northeast Valley Health Corporation  
Northern California Center for Well-Being  
Nourish California  
Oasis Legal Services  
Open Heart Kitchen  
Pacific Asian Counseling Services  
Parent Voices Oakland  
Pars Equality Center  
Pomona Economic Opportunity Center  
Public Health Justice Collective  
Public Immigrant Policies Institute of Los Angeles (PIPIL)  
Rainbow Pride Youth Alliance  
Redwood Empire Food Bank  
Sacramento Covered (Healthy Community Forum for the Greater Sacramento Region)  
San Bernardino Community Service  
San Diego for Every Child  
San Diego Hunger Coalition  
San Diego Immigrant Rights Consortium  
San Francisco AIDS Foundation  
San Francisco Community Clinic Consortium  
San Francisco-Marin Food Bank  
San Joaquin College of Law - New American Legal Clinic  
Santa Paula Brown Berets  
Second Harvest Food Bank of Orange County  
Second Harvest Food Bank Santa Cruz County  
Second Harvest of Silicon Valley  
SEIU CA

Senior Coastsiders, Inc.  
Services, Immigrant Rights and Education Network (SIREN)  
South Asian Network  
South Bay People Power  
St. John's Community Health  
Sycamores  
Thai Community Development Center  
The Children's Partnership  
The Gubbio Project  
The Inland Empire Immigrant Youth Collective  
The Public Interest Law Project  
The Women's Building  
TODEC Legal Center  
TURN - The Utility Reform Network  
UpValley Family Centers of Napa County  
Venice Family Clinic  
Ventura County Clergy and Laity United for Economic Justice  
WECAN FOUNDATION  
Western Center on Law & Poverty  
Western Regional Advocacy Project  
Westside Food Bank  
Women's Foundation California  
Youth Alliance

## **Colorado**

BGOLDN  
Bienvenidos Food Bank  
Center for Health Progress  
CIRC Action Fund  
Clinica Colorado  
Colorado Center on Law and Policy  
Colorado Children's Campaign  
Colorado Coalition for the Homeless  
Colorado Consumer Health Initiative  
Colorado Fiscal Institute  
Colorado Latino Leadership Advocacy and Research Organization  
Colorado Organization for Latina Opportunity and Reproductive Rights  
Colorado People's Alliance

Común  
Compañeros: Four Corners Immigrant Resource Center  
Covering Kids and Families  
Eagle Valley Community Foundation  
Eastside Action Support Team  
Engaged Latino Parents Advancing Students Outcomes (ELPASO)  
Family and Intercultural Resource Center  
Family Resource Center Association  
GoFarm  
Hunger Free Colorado  
Jewish Family Service of Colorado  
La Raza Services, Inc. dba Servicios de La Raza  
Living water ministry outreach  
Memorial Regional Health  
Metro Caring  
Mountain Family Center  
Planned Parenthood of the Rocky Mountains  
Prairie Family Center  
Servicios de la Raza  
Slow Food Denver  
The Colorado Blueprint to End Hunger  
Together Colorado  
Tri-County Health Network

## **Connecticut**

Apostle Immigrant Services  
Building One Community  
Center for Medicare Advocacy  
Connecticut Institute for Refugees and Immigrants  
Connecticut Shoreline Indivisible  
End Hunger CT!  
Greater Hartford Legal Aid  
Health Equity Solutions  
Quinnipiac University School of Law Clinic

## **Delaware**

Community Legal Aid Society, Inc

Food Bank of Delaware  
Jewish Family Services of Delaware  
La Esperanza, Inc.  
Latin American Community Center  
Progreso: Latino Progress

## **District of Columbia**

Asian Pacific American Legal Resource Center  
AsylumWorks  
Bread for the World  
Central American Resource Center  
D. C. Hunger Solutions  
DC Health Benefit Exchange  
DC Statehood Green Party  
Dorothy Day Catholic Worker, DC  
La Clinica del Pueblo  
Legal Aid Society of the District of Columbia  
RESULTS DC/MD  
The National Consumer Voice for Quality Long-Term Care  
The Platform of Hope  
Tzedek DC  
Washington National Cathedral Sanctuary Ministry  
YWCA USA

## **Florida**

Americans for Immigrant Justice  
Catalyst Miami  
Florida Council of Churches  
Florida Health Justice Project  
Florida Impact  
Florida Policy Institute  
Hispanic Services Council, Inc.  
Miami Coalition to Advance Racial Equity  
SEIU 1991  
SEIU 32BJ  
The Florida Chapter of the American Academy of Pediatrics



## **Georgia**

Atlanta Community Food Bank  
Georgia Advancing Communities Together, Inc.  
Georgia Asylum and Immigration Network (GAIN)  
Georgia Chapter American Academy of Pediatrics  
Georgia Human Rights Clinic  
Georgia Women (And Those Who Stand With Us)  
Latin American Association  
Latino Community Fund (LCF Georgia)  
Raksha, Inc  
SisterLove, Inc.

## **Hawaii**

Hawaii Appleseed Center for Law & Economic Justice  
Hawaii Children's Action Network Speaks!  
Hawaii Health & Harm Reduction Center  
Hawai'i Health & Harm Reduction Center  
Hawaii State Coalition Against Domestic Violence  
Hep Free Hawai'i  
HI Coalition for Immigrant Rights  
Waipahu Safe Haven Immigrant/Migrant Resource Center  
We Are Oceania (WAO)

## **Idaho**

Centro de Comunidad y Justicia  
Idaho Asset Building Network  
Idaho Voices for Children  
PODER of Idaho

## **Illinois**

ACA Consumer Advocacy  
AgeOptions  
AIDS Foundation Chicago  
Alliance of Filipinos for Immigrant Rights and Empowerment  
Binational Institute of Human Development

Brighton Park Neighborhood Council  
Catholic Charities, Diocese of Joliet  
Champaign County Health Care Consumers  
Chicago House and Social Service Agency  
Chicago Metro LCLAA  
Chinese American Service League  
COFI  
Cook County Health  
DuPage Federation on Human Services Reform  
Enlace Chicago  
EverThrive Illinois  
Family Focus  
Forging Opportunities for Refugees in America  
Greater Chicago Food Depository  
Hanul Family Alliance  
Health & Medicine Policy Research Group  
Health Justice Project  
Healthy Communities Foundation  
Housing Action Illinois  
Howard Brown Health  
Illinois Chapter, American Academy of Pediatrics  
Illinois Coalition for Immigrant and Refugee Rights  
Illinois Collaboration on Youth  
Illinois Hunger Coalition  
Illinois Partners for Human Service  
Illinois Public Health Institute  
Indo-American Center  
Lake County Health Department and Community Health Center  
Lakeview Pantry  
Latino Policy Forum  
Lawyer's Committee for Better Housing  
Legal Action Chicago  
Legal Council for Health Justice  
Lincoln Park Presbyterian Church  
Logan Square Neighborhood Association  
Mano a Mano Family Resource Center  
Mujeres Latinas En Accion  
Our Lady of Mount Carmel Food Pantry  
Polish American Association

POWER-PAC IL  
Refugee Action Network  
Refugee Education & Adventure Challenge (REACH)  
RefugeeOne  
Sanctuary Task Force, Episcopal Diocese of Chicago  
ScaleLIT  
Southwest Organizing Project  
Southwest Suburban Immigrant Project  
The Network: Advocating Against Domestic Violence  
University YMCA  
VNA Foundation  
Wellington United Church of Christ  
YWCA Metropolitan Chicago  
YWCA of the University of Illinois  
YWCA Southwestern Illinois

## **Indiana**

Fair Housing Center of Central Indiana, Inc.  
Feeding Indiana's Hungry  
Immigrant Welcome Center  
Indiana Coalition for Human Services  
Indiana Community Action Association  
Indiana Community Action Poverty Institute  
Indiana Justice Project  
Indianapolis Jewish Community Relations Council  
Indianapolis Urban League  
Indy Hunger Network  
La Casa de Amistad  
MCCOY (Marion County Commission on Youth, Inc.)  
Pack Away Hunger  
St. Vincent de Paul Indianapolis

## **Iowa**

Catholic Peace Ministry  
EMBARC IOWA  
Iowa Citizens for Community Improvement  
Iowa Coalition Against Domestic Violence

Iowa Conference of the United Methodist Church  
Iowa Migrant Movement for Justice (Iowa MMJ)  
KOREAN-AMERICAN SOCIETY OF IOWA  
Latinx Immigrants of Iowa  
MFSA Iowa  
Monsoon Asians & Pacific Islanders in Solidarity  
Project IOWA Inc.  
Southwest Iowa Latino Resource Center

## **Kansas**

Community Health Council of Wyandotte County  
El Centro Inc

## **Kentucky**

CRCKY (Community Response Coaliton of Kentucky Inc.)  
Homeless and Housing Coalition of Kentucky  
Kentucky Center for Economic Policy  
Kentucky Equal Justice Center  
Kentucky Voices for Health  
RADIOLEX  
Sisters of Charity of Nazareth Western Province Leadership

## **Louisiana**

Jewish Family Service of Greater New Orleans  
Louisiana Budget Project  
Louisiana Progress  
Workplace Justice Project at Loyola Law Clinic

## **Maine**

Consumers for Affordable Health Care  
Maine Business Immigration Coalition  
Maine Center for Economic Policy  
Maine Community Action Partnership  
Maine Equal Justice  
Maine Immigrants Rights Coalition

Maine Medical Association  
Preble Street  
YWCA Central Maine

## **Maryland**

Direct Support for Immigrants  
Jubilee Association of Maryland  
Maryland Chapter, American Academy of Pediatrics  
Maryland Citizens' Health Initiative Education Fund, Inc.  
Maryland Hunger Solutions  
Montgomery County Community Action Board  
Public Justice Center  
The Talking Drum Incorporated  
World Relief Spokane

## **Massachusetts**

Allston Brighton Health Collaborative  
Asian Task Force Against Domestic Violence (ATASK)  
Boston Immigrant Justice Accompaniment Network  
Boston Medical Center  
Brazilian Women's Group  
Cape Cod Coalition for Safe Communities  
Casa Myrna Vazquez, Inc.  
Center for New Americans  
Center for Public Representation  
Central West Justice Center  
Children's Law Center of Massachusetts  
Chinese Progressive Association  
Community Action Agency of Somerville, Inc.  
Community Research Initiative of New England, Inc.  
Conference of Boston Teaching Hospitals  
Dana-Farber Cancer Institute  
Disability Law Center  
Disability Policy Consortium  
DOVE, Inc.  
Economic Mobility Pathways (EMPath)  
Elizabeth Freeman Center, Inc.

Enroot  
Fenway Health  
Greater Boston Legal Services  
Greater Lawrence Community Action Council  
Health Care For All  
Health Imperatives, Inc.  
Health Law Advocates  
Immigrant Service Providers Group/Health  
Independence House  
International Institute of New England  
Irish Pastoral Centre Boston  
Jewish Family & Children's Service of Greater Boston  
Justice Center of Southeast Massachusetts  
Latinos Unidos en Massachusetts  
LEO Inc.  
Lynn Community Health Center  
Mass General Brigham  
Massachusetts Advocates for Children  
Massachusetts Alliance of Portuguese Speakers (MAPS)  
Massachusetts Coalition for the Homeless  
Massachusetts Immigrant and Refugee Advocacy Coalition  
Massachusetts Law Reform Institute  
Maverick Landing Community Services (MLCS)  
MetroWest Legal Services  
Metrowest Worker Center - Casa  
MIRA Coalition  
National Association of Social Workers, MA Chapter  
New Hope Inc  
Northeast Justice Center  
Project Bread  
REACH Beyond Domestic Violence, Inc.  
Rian Immigrant Center  
Safe Passage  
Sisters of St. Joseph of Boston  
Somerville Food Security Coalition  
Spanish American Center  
St Mark Community Education Program  
Stone House  
Student Clinic for Immigrant Justice, Inc.

The Food Bank of Western Massachusetts  
The Greater Boston Food Bank  
The Network/La Red  
The Right to Immigration Institute  
Transition House  
TRUE ALLIANCE CENTER INC/ GBNCC  
Tufts Medicine  
Tzedek@Sinai  
Unitarian Universalist Mass Action  
Worcester County Food Bank  
Worcester Food Policy Council  
YWCA Northeastern Massachusetts

## **Michigan**

ABISA  
ACCESS  
Caribbean Community Service Center (CCSC)  
Center for Civil Justice  
Detroit Hispanic Development Corporation  
Dominican Sisters ~ Grand Rapids  
Freedom House Detroit  
Great Lakes ADA of Michigan  
IHM Sisters Justice, Peace and Sustainability Office  
Islamic Center of Detroit  
Justice for Our Neighbors Michigan  
Lighthouse Immigrant Advocates  
Medical Behavioral Health Solutions, LLC  
Michigan Disability Rights Coalition  
Michigan Immigrant Rights Center  
Michigan League for Public Policy  
Voces  
Washtenaw Health Plan

## **Minnesota**

Hunger Solutions Minnesota  
Jewish Community Action  
Mid-Minnesota Legal Aid

Minnesota Budget Project  
Minnesota Housing Partnership  
Second Harvest Heartland

### **Mississippi**

El Pueblo  
Immigrant Alliance for Justice and Equity  
Mississippi Center for Justice  
Mississippi Immigrants Rights Alliance

### **Missouri**

Bilingual International Assistant Services  
Immigrant Home English Learning Program  
Inter-Faith Committee on Latin America  
Legal Services of Eastern Missouri  
Migrant and Immigrant Community Action Project  
Operation Food Search

### **Montana**

Bienvenidos a Gallatin Valley  
Montana Budget and Policy Center  
Montana Human Rights Action Network  
Montana Women Vote  
South North Nexus

### **Nebraska**

Asian Community & Cultural Center  
Centro Hispano Comunitario De Nebraska  
Comunidad Maya Pixan Ixim  
Nebraska Appleseed  
Omaha Together One Community  
Unity in Action



## **Nevada**

Nevada Chapter, American Academy of Pediatrics  
Planned Parenthood of the Rocky Mountains  
Silver State Equality

## **New Hampshire**

New Hampshire Hunger Solutions, Inc.  
New Hampshire Legal Assistance  
NH Hunger Solutions

## **New Jersey**

Disability Rights New Jersey  
El Pueblo Unido of Atlantic City y Pueblos Cercanos  
Greater Newark Enterprises Corporation  
Jewish Family Service of Atlantic & Cape May Counties  
Latino Action Network Foundation  
Legal Services of New Jersey  
Lutherans Engaging in Advocacy Ministry NJ  
New Jersey Alliance for Immigrant Justice  
New Jersey Association on Correction  
NJ Citizen Action  
Volunteer Lawyers for Justice

## **New Mexico**

ACLU-NM  
Center for Civic Policy  
Centro Savila  
El CENTRO de Igualdad y Derechos  
Enlace Comunitario  
La Plaza de Encuentro Gathering Place (Encuentro)  
New Mexico Asian Family Center  
New Mexico Center on Law and Poverty  
New Mexico Dream Team  
New Mexico Immigrant Law Center  
New Mexico Voices for Children

NMVC Action Fund  
OLÉ Education Fund  
Planned Parenthood of the Rocky Mountains

## **New York**

A Place for Kids  
Academy of Medical & Public Health Services  
African Services Committee  
Amercian Academy of Pediatrics New York Chapter 2  
Arab-American Family Support Center Inc  
Cabrini Immigrant Services of NYC, Inc.  
Caribbean Equality Project  
Center for the Integration and Advancement of New Americans, Inc. (CIANA).  
Chinese Progressive Association  
Chinese-American Planning Council (CPC)  
City Harvest  
Cityblock Health  
Coalition for Asian American Children and Families  
Committee for Hispanic Children & Families (CHCF)  
Community Inclusion and Development Alliance  
Emerald Isle Immigration Center  
Empire Justice Center  
Feeding New York State  
FOCUS Churches of Albany, Inc.  
Food Bank of Central New York  
Food Bank of the Southern Tier  
Garra (Legal name: Cidadao Global, Global Citizen Inc)  
Hunger Solutions New York  
Japanese American Social Services, Inc.  
Long Island Cares, Inc.-The Harry Chapin Food Bank  
Long Island Immigration Clinic  
Make the Road New York  
Midtown South Community Council  
Mobilization for Justice, Inc.  
National Association of Social Workers NYC Chapter Immigration and Global Social Work Committee  
National Organization of Wayne County  
New York Immigration Coalition

New York Justice for Our Neighbors, Inc.  
New York Lawyers for the Public Interest  
New York State Council of Churches  
New York Yearly Meeting of the Religious Society of Friends  
Nido de Esperanza  
NYS AAP - Chapter 2  
NYS AAP - Chapter 3  
Project New Yorker  
Safe Passage Project  
Sakhi for South Asian Women  
Sapna NYC  
Saratoga Immigration Coalition  
South Asian Council for Social Services  
Strong Children Wellness  
The Interfaith Center of New York  
The Legal Aid Society  
Treatment Action Group  
Wayne Action for Racial Equality

## **North Carolina**

A Way Home America  
Association of Mexicans in North Carolina  
Charlotte Center for Legal Advocacy  
Child Care Services Association  
El Vínculo Hispano / Hispanic Liaison  
Greater High Point Food Alliance  
Marcella Middleton  
NC FIELD, Inc.  
NC Pediatric Society  
North Carolina AIDS Action Network  
North Carolina Budget & Tax Center  
North Carolina Justice Center  
Pisgah Legal Services  
Second Harvest Food Bank of Northwest North Carolina  
Toxic Free NC

## **North Dakota**

Bismarck Global Neighbors  
Global Friends Coalition  
Grace Action Chapel International  
High Plains Fair Housing Center  
New American Consortium for Wellness and Empowerment  
North Dakota Human Rights Coalition  
North Dakota KIDS COUNT

## **Ohio**

Asian Services in Action, Inc. (ASIA)  
Cleveland Jobs with Justice  
HOLA Ohio  
Jewish Family Services  
Legal Aid Society of Columbus  
Miami Valley Immigration Coalition  
Mid-Ohio Food Collective  
New Directions Career Center  
Policy Matters Ohio  
The Ohio Council of Churches  
The P.E.E.R. Center  
Vincentian Ohio Action Network

## **Oklahoma**

Hunger Free Oklahoma  
Oklahoma Policy Institute  
Restore Hope Ministries

## **Oregon**

Adelante Mujeres  
Asian and Pacific American Network of Oregon  
CASA of Oregon  
Centro Cultural  
College Housing Northwest  
Housing Oregon

Legal Aid Services of Oregon  
Northwest Pilot Project  
Oregon Food Bank  
Oregon Law Center  
Oregon Pediatric Society  
Our Children Oregon  
REACH Community Development  
ROSE Community Development  
Virginia Garcia Memorial Health Center

## **Pennsylvania**

1HoodPower  
ACLAMO  
Alianzas de Phoenixville  
All for All Coalition  
Bhutanese Community Association of Pittsburgh (BCAP)  
Caribbean Festival and Cultural Organization of PA  
Casa San Jose  
Centro de Cultura, Arte, Trabajo y Educación  
Chester County Foodbank  
Children First  
Coalition for Low Income Pennsylvanians  
Coalition of Africian Communities - Philadelphia  
Community Legal Services of Philadelphia  
Feed the Hood  
Greater Philadelphia Coalition Against Hunger  
Greater Pittsburgh Community Food Bank  
Grow Pittsburgh  
HIAS Pennsylvania  
Homeless Advocacy Project  
Housing Alliance of Pennsylvania  
Hunger-Free PA  
Immigrant Rights Action  
Irish Diaspora Center  
Just Harvest  
Justice at Work  
Lawrenceville United  
Legal Clinic for the Disabled

Lutheran Advocacy Ministry in PA  
Manna on Main Street  
Multicultural Community Family Services, Inc.  
Office of Immigrant and Refugee Affairs  
PA Chapter, American Academy of Pediatrics  
Pathways to Housing PA  
Pennsylvania Budget and Policy Center  
Pennsylvania Council of Churches  
Pennsylvania Health Access Network  
Pennsylvania Health Law Project  
Phoenixville Community Health Foundation  
Pittsburgh Food Policy Council  
Rehabilitation & Community Providers Association RCPA  
Southwest Community Development Corporation  
Trying Together

## **Rhode Island**

Alliance to Mobilize Our Resistance -AMOR-  
Coalition of Advocates for Student Opportunities (CASO)  
Housing Network of Rhode Island  
Immigrant Coalition of Rhode Island  
Latino Policy Institute  
Progreso Latino  
Protect Our Healthcare Coalition RI  
Rhode Island KIDS COUNT  
RI Chapter, American Academy of Pediatrics  
RI Coalition Against Domestic Violence  
The Economic Progress Institute  
The R.I. Center for Justice  
The Womxn Project

## **South Carolina**

Latino Communications CDC  
S.C. Appleseed Legal Justice Center  
South Carolina Chapter of the American Academy of Pediatrics

## **South Dakota**

Caminando Juntos - Presentation Sisters Hispanic Ministry  
South Dakota Voices for Peace (SDVFP)

## **Tennessee**

American Muslim Advisory Council  
McNeilly Center for Children  
Nurture the Next  
Rescuing Health  
Southern Christians Coalition  
Tennessee Health Care Campaign  
Tennessee Immigrant & Refugee Rights Coalition  
Tennessee Justice Center  
Tennessee Justice for Our Neighbors  
The Family Center  
The Healing Trust  
United Neighborhood Health Services (dba Neighborhood Health)

## **Texas**

Alianza Latina Internacional  
ARISE Adelante  
Asian American Health Care Coalition dba HOPE Clinic  
Asian Family Support Services of Austin  
Austin Region Justice for Our Neighbors  
AWAAZ  
Border Agricultural Workers Project  
CHILDREN AT RISK  
CitySquare  
Connect for Healthcare (a multidisciplinary collaborative formed to thaw the chilling effects created by the 2019 public charge rule and to improve immigrants' access to healthcare)  
CRECEN  
DAYA INC  
Daya Inc.  
Equal Justice Center  
Every Texan  
Faith Commons

Feeding Texas  
First Unitarian Universalist Church of Austin Inside Amigos Project  
First Unitarian Universalist Church of Houston  
Fund Texas Choice  
Hays-Caldwell Women's Center  
Houston Food Bank  
Houston Immigration Legal Services Collaborative  
Human Rights Initiative of North Texas  
Jane's Due Process  
Jewish Family Service of Greater Dallas  
Justice For Our Neighbors - North Central Texas  
La Union del Pueblo Entero (LUPE)  
LaUnidad11  
Lilith Fund  
Living Hope Wheelchair Association  
LUPE  
Mexican American Legislative Caucus  
National Association of Social Workers - Texas Chapter  
Opening Doors International Services  
Proyecto Azteca  
Proyecto Mujeres Fronterizas  
Reform Immigration for Texas Alliance  
Tahirih Justice Center  
Texans Care for Children  
Texas Association of Community Health Centers  
Texas Council on Family Violence  
Texas Doctors for Social Responsibility  
Texas Equal Access Fund  
Texas Grandparents Raising Grandchildren  
Texas House Democratic Caucus  
Texas Impact  
Texas Organizing project  
Texas Pediatric Society  
Texas Senate Hispanic Caucus  
Texas Unitarian Universalist Justice Ministry  
The Foundation for the Austin Sanctuary Network  
Trabajadores Unidos Fronterizos  
VAC | Westbrook Clinics  
VELA



Woori Juntos  
Youth Rise Texas

## **Utah**

Comunidades Unidas  
Crossroads Urban Center  
United Way of Salt Lake  
Utah Health Policy Project  
Utahns Against Hunger  
Voices for Utah Children

## **Vermont**

American Academy of Pediatrics Vermont Chapter  
Edible Brattleboro  
Greater Bennington Community Services  
HANDS  
Hunger Free Vermont  
Kitchen Soup Project  
NOFA-VT  
Public Assets Institute  
Putney Foodshelf  
The DREAM Program  
The Family Place, Inc.  
The Vermont Foodbank  
United Ways of VT/Help Me Grow VT  
Upper Valley Haven, Inc.  
Vermont Legal Aid

## **Virginia**

ACLU People Power Fairfax  
Bristol Redevelopment and Housing Authority  
Dreamers Mothers In Action  
Edu-Futuro  
Just Neighbors  
Legal Aid Justice Center  
Sin Barreras

The Commonwealth Institute  
Virginia Coalition for Immigrant Rights  
Virginia Coalition of Latino Organizations  
Virginia Housing Alliance  
Virginia Hunger Solutions  
Virginia Interfaith Center for Public Policy  
Virginia Organizing  
Virginia Poverty Law Center

## **Washington**

AFT Washington  
ASIA PACIFIC CULTURAL CENTER  
Asian Counseling and Referral Service  
Asian Pacific Islander Coalition of South Puget Sound Chapter  
Asian Pacific Islander Coalition of Washington  
Ballard Food Bank  
Benefits Law Center  
Central Washington Justice For Our Neighbors  
Church Council of Greater Seattle  
City of Seattle Office of Immigrant and Refugee Affairs  
Colectiva Legal del Pueblo  
Columbia Legal Services  
Community Health Network of Washington  
Community Health of Central Washington  
Community Health Plan of Washington  
East King County APIC  
Economic Opportunity Institute  
Elizabeth Gregory Home  
Entre Hermanos  
Faith Action Network  
Health Care Is a Human Right WA  
Hispanic Round Table  
Immanuel Community Services  
Indian American Community Services  
InterIm CDA  
International Community Health Services  
Legal Voice  
Mujeres in Action (MiA)

Neighborcare Health  
Neighborhood House  
North Helpline  
Northwest Harvest  
Northwest Health Law Advocates  
Northwest Immigrant Rights Project  
Nuestra Casa  
OneAmerica  
Peninsula Community Health Services  
Protecting Immigrant Families - Washington  
PSARA (Puget Sound Advocates for Retirement Action)  
Refugee Women's Alliance  
ROOTS Young Adult Shelter  
Seattle/King County Coalition on Homelessness  
Solid Ground  
Spokane Immigrant Rights Coalition  
Statewide Poverty Action Network  
Strengthening Sanctuary Alliance  
SYL Foundation  
United Way of King County  
United Way of Pierce County  
University District Food Bank  
WA Partners for Social Change  
WA State Assn of Head Start and ECEAP  
Washington Association for Community Health  
Washington Community Action Network  
Washington Low Income Housing Alliance  
Washington State Community Action Partnership  
Washington State Parent Ambassadors

## **West Virginia**

West Virginians for Affordable Health Care

## **Wisconsin**

Feeding Wisconsin  
Kids Forward  
Welcoming America

Wisconsin Chapter of the American Academy of Pediatrics

Wisconsin Council of Churches

Wisconsin Faith Voices for Justice

Worker Justice Wisconsin

## **Wyoming**

Juntos

Wyoming Coalition Against Domestic Violence and Sexual Assault