



CITY OF SEATTLE

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

RE: Inadmissibility on Public Charge Grounds, Notice of Proposed Rulemaking, 83 Fed. Reg. 51114, DHS Docket No. USCIS-2010-0012.

Dear Ms. Deshommnes:

The City of Seattle (“City”) submits this comment in response to the proposed rule (“Rule”) published by the Department of Homeland Security (“DHS”) and the United States Citizenship and Immigration Services (“USCIS”) in their Notice of Proposed Rule Making (“NPRM”).

The policies articulated in the proposed Rule will terrify immigrant families, discourage or prevent hard-working people from immigrating, and deter immigrant families, including U.S. citizen children, from seeking the help they need to lead a healthy and productive life.

This updated rule would hurt Seattle in three key ways.

First, the more stringent rule would have a direct, negative impact on tens of thousands of Seattle residents. University of Washington experts estimate that proposed changes to public charge guidelines will directly affect 51,186 immigrants living in Seattle. The proposed changes will also indirectly reach another 33,185 City residents who live in households with someone who is directly impacted, including 10,143 U.S.-born children. The total affected immigrant population would be 84,371, or 64 percent of Seattle’s immigrant population.

Second, this new rule would erode access to health care for those 85,000 residents and hurt our economy. Public Health – Seattle & King County has determined that 10,500 children in Seattle, regardless of their status, could be negatively affected by the proposed public charge definition because their parents may be forced to choose between enrollment in important basic needs programs or reuniting with an immigrant family member. Implementing a rule, with the awareness that it may negatively impact the health of so many children, is unconscionable. Strong economies and talented workforces start with healthy individuals and healthy communities. That means providing access to health care benefits, including Medicaid.

Third, this rule would cut off the potential for millions in tax revenue. Immigrant households account for \$27.5 billion in spending power for Washington State, and immigrants living in the Seattle Metropolitan Area pay \$8 billion in taxes annually.



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Like so many things the current administration implements, the rule appears to attempt to solve a problem that does not actually exist. Time and again, we have seen this administration continue their cruel, divisive, and unlawful attacks on our immigrant and refugee neighbors. The proposed changes to the public charge determination is just one more example.

For all these reasons, the Department of Homeland Security (DHS) should immediately withdraw its current proposal and dedicate its efforts to advancing policies that strengthen—rather than undermine—the ability of immigrants to support themselves and their families in the future.

As with prior generations, today's immigrants are tomorrow's American citizens who should have the chance to contribute to the economic, cultural, and civic life of Seattle – and our nation.

Sincerely,

Mayor Jenny A. Durkan

Council President Bruce Harrell

Councilmember Sally Bagshaw

Councilmember M. Lorena González

Councilmember Lisa Herbold

Councilmember Debora Juarez

Councilmember Rob Johnson

Councilmember Teresa Mosqueda

Councilmember Mike O'Brien

Councilmember Kshama Sawant