



WASHINGTON NONPROFITS

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SUMMARY

Washington Nonprofits, Washington State's nonprofit association, strongly opposes the proposed "public charge" rule issued by the Department of Homeland Security. Through conversations with many of our members and partners, we have learned that the proposed regulations will impede mission-driven work conducted by nonprofits in communities throughout Washington State. Because of this, we strongly urge the department to rescind its proposed "public charge" regulations.

ANALYSIS

This change is slated to impact four specific federal programs: SNAP, non-emergency Medicaid, Medicare Part D, and public housing assistance (Section 8). Often, nonprofits serve as the local administrator for these services or refer their clients to the programs when needed. However, when one service is interrupted for nonprofit clients and their families, other services are disrupted too, which is why this proposal is so harmful for the nonprofit sector as a whole.

The effect our members are seeing is that the threat of expanded public charge criteria has caused individuals to pull out of services out of fear for jeopardizing their immigration status. Some prominent examples include:

- As reported by Crosscut, "a nutrition services supervisor at International Community Health Services says she's had patients walk away from government programs that provide medical benefits because they're afraid of being deported. Overall, the program has seen a 10 percent drop in enrollments at ICHS clinics and as much as a 25 percent drop at its Shoreline WIC clinic" (Fowler, L. 2018).
- According to the Washington Association of Community and Migrant Health Centers, "Our community health centers are already seeing worried patients shy away from necessary services for fear it will jeopardize their future. And they're choosing not to enroll in health insurance even if they qualify. We don't want our neighbors and classmates saying no to health care" (Ward, S. 2018).
- Representatives of Northwest Harvest and the Ethnic Business Coalition in Seattle wrote, "Would you want to be forced by the government to choose between safeguarding the health and safety of your family or protecting your family's ability to stay together?" (Hoang, T. and Reynolds, T, 2018).
- According to the Washington State Community Action Partnership, "Under the new rule, legally working parents earning minimum wage could be put in line for deportation for providing their children with health care and nutritious food. Policies that punish working families for trying to make ends meet are cruel, regardless of one's immigration status. When it comes to poverty, however, children in immigrant families are disproportionately impacted. In 2016, 34 percent of Washington children lived in households that struggled to make ends meet. That number was 44 percent for the almost half a million children with one or more foreign-born parents." And "The federal government's climate of hostility toward

immigrant communities is already impacting the people we serve” (Mount, M. and Stoddard, L. 2018).

- Dr. Rupin Thakkar, President of the Washington State chapter of the American Academy of Pediatrics, wrote: “My pediatric colleagues and I have been seeing parents forgoing health care for their kids out of fear of deportation or family separation. In my own practice, no-show rates and appointment cancellations among immigrant families have noticeably increased. ... In Washington State, 1 in every 2 children relies on Medicaid for their health care coverage. Children with Medicaid are twice as likely to have routine check-ups and vaccinations than uninsured children. Preventive care and proper treatment for chronic conditions have insured that children are less likely to need expensive hospitalizations. ... The fear families face as a result of the proposed regulation will lead to fewer children and their parents having health insurance” (Thakkar, R. 2018).
- According to *The Seattle Times*, King County public health officials estimate that this rule will exacerbate homelessness and other public health problems that exist within King County (Seattle Times, 2018).
- Washington Governor Jay Inslee warned of significant consequences for Washington State in a letter to Office of Management and Budget Director Mick Mulvaney dated April 24, 2018.

The stories about the proposal’s impact are not limited to the points above -- those are just prominent examples that have been reported by Washington State news media. Many organizations around the state have spoken out against the proposal (PIF Campaign 2018), and many more are planning to before the comment period closes.

However, several organizations expressed to us that they are afraid to take a public stance against this proposal out of fear of jeopardizing their ability to receive federal funds for services. In addition, we heard anecdotally that some providers are concerned about continuing to receive federal funds if it means supplying data to the government that could be used to arrest and deport otherwise law-abiding immigrants. These are unacceptable and counterproductive consequences that the federal government must consider in its evaluation of this policy proposal.

A recent Migration Policy Institute report estimated that the number of noncitizens who could be determined a public charge would rise from 3 percent to at least 47 percent nationally. In Washington State, that means at least 244,800 people could be affected (Migration Policy Institute, 2018). The Washington Budget and Policy estimated in its analysis of the proposed rules that up to 580,000 Washington State residents could be impacted (Olson, 2018). The Children’s Alliance estimates that “the administration’s effort to expand the definition and application of the public charge test effectively withholds essential public services from many of the 1 in 4 Washington children growing up in immigrant families. The result: poorer health, more hunger and greater inequity for children and families, particularly for immigrant communities of color” (Children’s Alliance, 2018).

At the community level, the impact of expanding public charge criteria means more people needing services with fewer provider options. This would be an untenable situation that leaves communities paying the price for misguided and mean-spirited federal policy changes.

Nonprofits are effective because they have the trust of their clients, who tend to be the most vulnerable and marginalized among our communities. But, the Trump Administration's anti-immigrant and xenophobic actions are erecting barriers between clients and providers at a time when barriers need to be broken down.

Until there is a major change in the Administration's treatment of immigrants and refugees, it is extremely difficult to envision clients who voluntarily left programs coming back for services. Because of this, kids and families will go hungry, treatable and preventable medical conditions will claim lives, the number of emergency room visits will rise costing tax payers even more money in the long run, and our friends and neighbors will continue to live in fear and disengage from their communities.

Therefore, in keeping with our vision of creating thriving communities across Washington State, we urge the Department of Homeland Security to rescind its proposed regulations.

ABOUT WASHINGTON NONPROFITS

Washington Nonprofits is Washington's state association for nonprofits. Its mission is to make sure nonprofits have what they need to succeed. It helps nonprofits learn, increase their influence, and connect to people and resources. Visit our website at www.washingtonnonprofits.org or contact Washington Nonprofits' Public Policy Director David Streeter at (855) 299-2922 for more information.

REFERENCES

Children's Alliance (2018) Protecting Washington's Immigrant Families. Retrieved from: <https://www.childrensalliance.org/protecting-washingtons-immigrant-families>

Fowler, L. (November 26, 2018). Advocates Fight Trump Rule They Say Threatens Community Health. *Crosscut*. Retrieved From: <https://crosscut.com/2018/11/advocates-fight-trump-rule-they-say-threatens-community-health>

Hoang, T. and Reynolds, T. (October 15, 2018). Immigration rule change would force people to choose between food and family. *The Seattle Times*. Retrieved from: <https://www.seattletimes.com/opinion/immigration-rule-change-would-force-people-to-choose-between-food-and-family/>

Inslee, J. (April 24, 2018). Letter to OMB Director Mick Mulvaney. Retrieved from: https://www.governor.wa.gov/sites/default/files/Gov%20Insee%20ltr%20re%20Public%20Charge%20rules.pdf?utm_medium=email&utm_source=govdelivery

Migration Policy Institute. (2018) National and State-Level Estimates of Use of Means-Tested Public Benefits, by U.S. Citizenship Status. Washington, DC: MPI. Retrieved from: <https://www.migrationpolicy.org/sites/default/files/datahub/PublicCharge-StateEstimates.xlsx>

Mount, M. and Stoddard, L. (December 1, 2018) Public Charge Proposal Would Harm War on Poverty. *The Spokesman-Review*. Retrieved from:

<http://www.spokesman.com/stories/2018/dec/01/merritte-mount-and-lisa-stoddard-public-charge-pro/>

Olson, L. (December 5, 2018) New "public charge" proposal would harm Washington families. Washington Budget and Policy Center. Retrieved from:

<https://budgetandpolicy.org/schmudget/new-201cpublic-charge201d-proposal-would-harm-washington-families>

Seattle Times. (October 11, 2018). ‘Heartless, punitive’: Health officials, immigrant advocates decry Trump proposal to limit access to green cards if using public benefits. *The Seattle Times*.

Retrieved from: <https://www.seattletimes.com/seattle-news/health/heartless-punitive-patient-advocates-decry-trump-move-to-restrict-immigrants-health-care-access/>

Shapiro, N. (August 12, 2018). As Trump Considers Penalties, Seattle-Area Immigrants Turn Down Public Benefits They’re Entitled to Claim. *The Seattle Times*. Retrieved from:

<https://www.seattletimes.com/seattle-news/legal-immigrants-in-seattle-area-alarmed-over-possible-penalties-for-using-benefits/>

Thakkar, R. (November 4, 2018). A Rule Change That Hurts Kids and Ourselves. *Everett Herald*.

Retrieved from: <https://www.heraldnet.com/opinion/commentary-a-rule-change-that-hurts-kids-and-ourselves/>

Ward, S. (September 26, 2018). Washington State Safety Net Providers Oppose New “Public Charge” Policy. *The State of Reform: Bridging the gap between healthcare and health policy*.

Retrieved from: <https://stateofreform.com/news/states/washington/2018/09/washington-state-safety-net-providers-oppose-new-public-charge-policy/>