

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

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