



## Association of Arizona Food Banks

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# Oppose Changes that Will Increase Hunger in Arizona

## [Submit comments to the Department of Homeland Security](#) by **December 10, 2018.**

**Overview:** In October 2018, the Department of Homeland Security (DHS) proposed changes to what is commonly referred to as the ‘**public charge**’ rule. If they are adopted, these new regulations would make it harder for families who are following all the rules of legal immigration to enter the United States or obtain a “green card” to become legal permanent residents. Their immigration status would be jeopardized if they use any of the public benefits listed below, even temporarily:

- Supplemental Nutrition Assistance Program (SNAP, formerly food stamps),
- Medicaid (AHCCCS in Arizona),
- Medicare Part D (prescription subsidy for older adults),
- Housing assistance, and
- Potentially the Children’s Health Insurance Program (CHIP, or KidsCare in Arizona).

**Why Do Comments Matter?** When a federal agency proposes rule changes, it is required to allow the public 60 days to provide feedback. This is the only way to tell the Administration how proposed changes would impact you, your family, and your community.

- Comments give our communities a chance for their voice to be heard.
- Federal law requires that the government read and consider every *unique* comment before issuing a final rule.
- The public has submitted more than 80,000 comments as of Nov. 21, 2018. Each comment must be read, so a high volume of comments could not only persuade DHS to reconsider the harmful rule changes but also just slow down the process, giving families more time to safely receive the life-saving benefits they need.
- Comments can later provide an opportunity to challenge the regulations in court.

## Tips for Submitting Comments

- All comments are due by December 10, 2018, at 5pm Eastern Time.
- Submit comments online: [www.regulations.gov/document?D=USCIS-2010-0012-0001](http://www.regulations.gov/document?D=USCIS-2010-0012-0001).
  - See step-by-step guidelines below.
- All comments must be submitted in English.
- All comments must be “unique,” meaning they cannot be form letters, templates, or identical. To make the most impact, **it’s important to add your own words and ideas to your comment.** Take a moment to highlight how the change would affect you or your neighbors, using any expertise or experience you have. Below are examples to consider using, **along with your own words.**

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Community Food Bank of Southern Arizona, Tucson | Desert Mission Food Bank, Phoenix  
St. Mary’s Food Bank Alliance, Phoenix | United Food Bank, Mesa | Yuma Community Food Bank, Yuma

## Talking Points for Comments

- I strongly oppose the Department of Homeland Security's proposed changes to the "public charge" rule because [insert personal experience/expertise on the value of these public benefits].
- The loss of access to SNAP would further exacerbate food insecurity in Arizona. SNAP is a critical source of support for struggling households; research shows how SNAP lifts people out of poverty; reduces hunger and obesity; and improves school attendance, behavior, and achievement.
- The consequences of food insecurity are especially detrimental to the health, development, and well-being of children. Arizona has already seen a 25 percent decline in green-card holders accessing SNAP in the past year, which also means children eligible for free or reduced price meals in school are not receiving them.
- According to a forecast by the U.S. Department of Homeland Security, the rule will cause 324,438 people each year to drop or forgo public benefits for which they are eligible.
- In 2014, immigrants and their employers contributed \$88.7 billion in private insurance premiums, but spent only \$64 billion for care. Native-born consumers paid \$616 billion in premiums and received nearly \$641 billion in insurers' payments for care. They also consistently outspent immigrants across all age groups. o On average, individual immigrants paid \$1,123 more for premiums in 2014 than they received in insurance-covered care.
- The proposed rule changes would likely result in lower rates of health insurance coverage not only for immigrants, but also for their U.S.-born children and other dependents.
- The policy will undermine access to essential health, nutrition, and shelter for immigrants and their families. **One in four** children in Arizona, and nearly **20 million children** nationwide, live with at least one immigrant parent. By forcing parents to choose between healthcare or food and legal permanent residency, our communities are put at risk.
- This policy change is short-sighted and will shift costs to states as well as create pervasive, expensive problems down the road. DHS should immediately withdraw its proposal.
- A community's overall health depends on the health of all of its members. The proposed rule change will undoubtedly lead to higher rates of uninsured adults and children. Without health insurance, families may delay care or forego it altogether. People will be forced to go to school or work while ill, spreading untreated illnesses. Fewer vaccinations for children will have dangerous repercussions. Treatment for life-threatening conditions will decline, as will school attendance.
- More people delaying care will strain emergency resources. Hospitals' and clinics' uncompensated care burdens will increase. Children with Medicaid and CHIP have better health as adults, with fewer hospitalizations and emergency room visits; they also earn more and pay more in taxes.

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