

Submitted via www.regulations.gov

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.

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 Coalition
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

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
Cabrin 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: Cidado 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