

November 20, 2018

Ms. Samantha Deshommès
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW
Washington, D.C. 20529-2140

Dear Ms. Deshommès:

On behalf of the New York State School Boards Association (NYSSBA), we are writing at this time to express our opposition to the Administration's proposed regulatory change to redefine "public charge" and make it much more difficult for low and moderate-income immigrants who have at any point legally accessed public assistance to obtain a green card, extend or change their temporary status in the US. Such a policy would dissuade immigrant parents from seeking proper medical care or nutritional sustenance that their children may need to be successful in school.

The proposal would expand the current public charge policy to include Medicaid, the Supplemental Nutrition Assistance Program (SNAP) and Public Housing. These programs are vital to families who cannot afford basic healthcare services, nutritious meals for their children or stable housing. Medicaid covers almost 37 million children nationwide. In fact, children make up almost half of all Medicaid beneficiaries. The 1.78 million Medicaid eligible children who access these services come to our schools better prepared to learn. When students arrive to class hungry or sick, they are unable to productively participate in educational programs. In fact, some of those same students may not even come to classes if they are too hungry or ill.

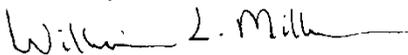
For over 30 years, public school districts have also depended on Medicaid funding. Nationwide, districts receive approximately \$4 billion in Medicaid funding each year. New York school districts receive more than \$270 million, \$136 million of which is funded federally. These funds help school districts provide critical health services to children, including vision and hearing screenings, psychological services, occupational and speech therapy, as well as diabetes and asthma diagnosis and management. Medicaid funding also helps offset costs for medically necessary services and equipment provided to children under the Individuals with Disabilities Education Act (IDEA). New York has over 250 approved and operating school-based health centers that rely heavily on Medicaid funding to remain solvent. The services these centers offer not only improve students' overall health; they also lead to fewer absences and improved academic performance. This funding is linked to the number of Medicaid eligible students enrolled.

It is critical that the federal government maintains a steady flow of funding to programs that support children's health and wellbeing. Medicaid and SNAP are just two such programs that provide essential services to children

who otherwise would be in no condition to effectively engage in classroom discussions or adequately focus on assignments. Our students are our future. We must invest in them.

For these reasons, we urge the Administration to abandon the current public charge proposal. If you have any questions or require additional information, please do not hesitate to contact us at 518-783-0200 or tim.kremer@nyssba.org.

Sincerely,



William L. Miller
President



Timothy G. Kremer
Executive Director

cc: NYS Congressional Delegation
Deborah Rigsby, NSBA