



Food Banks and Anti-Hunger Organizations Oppose the Proposed Public Charge Rule

Dozens of national, state, and local community-based food banks and anti-hunger organizations, as well as many thousands of their individual supporters, submitted comments in opposition to the U.S. Department of Homeland Security's proposed public charge regulation. This document includes the major reasons why food banks and anti-hunger organizations across the country oppose the rule and some highlights from their comments.

Why do food banks and anti-hunger organizations oppose public charge?

- Under existing and long-standing immigration policy, the use of nutrition, health care, and housing programs are not negative factors, in recognition that these programs are vital to keeping our communities healthy and safe, and individuals productive.
- The inclusion of the participation in the Supplemental Nutrition Assistance Program (SNAP) as a potential disqualifying negative factor in the proposed public charge regulation is troubling because nutrition is so vital to health and well-being.
- Research has consistently demonstrated that food insecure individuals are more likely to experience poor physical and mental health outcomes than those that are food secure. In adults, food insecurity has been implicated in both the cause and exacerbation of a variety of both costly and preventable chronic conditions.
- The proposed regulation will create confusion within immigrant communities regardless of whether they are impacted and increase the number of children who go to bed hungry every night.
- The proposed regulation uses a highly flawed and conservative estimate of the number of individuals who are likely to disenroll or forgo enrollment in public benefits like SNAP. And this rule will not only impact participation in SNAP but also participation in other vital nutrition programs, rolling back progress in addressing hunger and poverty.
- The estimated cost impacts in the proposed public charge regulation fail to take into account the additional costs to the healthcare system resulting from the failure to provide these services when needed to prevent expensive healthcare episodes.
- State and local governments would bear increased costs in serving these families' needs. Local nonprofits, such as food banks and pantries, would see increased demand and may not be able to adequately fill the gaps.

What did food banks and anti-hunger organizations have to say?

"We do not ask for citizenship status when providing our clients with food... It is not uncommon for households to have mixed status, such as first-generation immigrant parents raising U.S. citizen children. If this proposal were to be adopted as a rule, it would create confusion among these families about what public benefit programs they could access. Additionally, if they determined that accessing these programs could jeopardize their future immigration status, they would likely forego using them. This would greatly put their health and food security at risk."

Central Texas Food Bank

"As we work on the frontlines to end hunger, we have a responsibility to help any neighbor in need, regardless of race, religion, citizenship, disability, age, gender identity, sexual orientation, or any other criteria. Feeding America cares about the proposed rule on Public Charge because this policy creates another hurdle in the fight to end hunger, with receipt of food assistance through SNAP threatening an individual's lawful residency or citizenship."

Feeding America

"Immigrants are vital members of Oklahoma's labor force across industries, accounting for 1 in 12 workers. Immigrants who are authorized to work in the United States pay the same taxes as US citizens....The Regional Food Bank of Oklahoma opposes the proposed changes because we believe it will negatively impact the health of legal immigrant families and increase their likelihood of being food insecure."

Regional Food Bank of Oklahoma

"This will negatively impact health outcomes for those families and educational outcomes for their children both issues that create long term negative impact not only on those families, but on our communities as a whole. This policy does not recognize the day to day reality of working families in America that a job loss or temporary setback like hours lost due to business closures during a natural disaster can create a very real crisis for these families. Low income nutrition assistance programs like SNAP are designed to stabilize families until they get back on their feet. They need access to these programs without fear of being penalized for asking for help."

Georgia Food Bank Association

"Our small, rural food bank has seen a dramatic increase in the number of people needing food assistance. Many of our clients have made the choice to drop from the rolls of SNAP... As a county with a staggering 33% child food insecurity rate, we strongly oppose the proposed rule as it places the future of these children in great jeopardy."

Imperial Valley Food Bank

"A young pregnant mother who is a Legal Permanent Resident came to our food bank recently to apply for SNAP. She left without applying for this benefit that would ensure the health of her and her unborn child because she read information about this proposal. We strongly oppose the proposed rule on public charge which would restrict access to SNAP and other critical nutrition assistance programs for our state's low-income immigrant families and force families to choose between their basic needs and keeping their families together."

Food for People, Inc., Eureka, CA

"Malnourished adults are 50% more likely to be readmitted, and malnutrition is a factor in almost two million hospital stays annually. In contrast, appropriate nutrition can play a key role in managing or preventing the onset of some of our nation's most costly and pervasive chronic diseases.... For this reason, the inclusion of SNAP in the public charge calculus is troubling because nutrition is so vital to health."

Food Is Medicine Coalition

"If these proposed changes were to pass, the influx of people seeking charitable food support would be extremely taxing to the food bank network and to the fight against hunger. SNAP was designed to be used by citizens and eligible legal immigrants in times of need. And proposing restrictions on use will have lasting negative repercussions on many lives."

Food Bank Council of Michigan

The proposed rule would result in a significant cost shift to states and localities that would harm the health, economic security and wellbeing of our state's low-income families. When families disenroll from SNAP and other safety net programs, their need for basic supports does not disappear. Instead, costs associated with assisting families to meet their basic needs previously paid for with federal funds will be shifted to state and local entities."

California Association of Food Banks