

RE: DHS Docket No. USCIS-2021-0013: Public Comment Opposing the Rescission of the 2022 Public Charge Rule

As a public health scholar and community-based researcher working with Latinx immigrant and Indigenous communities in California, I strongly oppose the USCIS proposed rule change to rescind the 2022 definition of “public charge.” The 2022 rule was a critical corrective to the discriminatory and harmful 2019 version, and it helped restore clarity and trust for immigrant families who need access to health, nutrition, and housing support.

Rolling back the 2022 rule would once again allow individual immigration officers broad and subjective discretion in determining who may become a "public charge." In practice, this opens the door to increased racial and class bias, disproportionately harming Black, Brown, and low-income immigrants, particularly those in multilingual and mixed-status households.

My co-authored research, *Immigration Policy is Health Policy* (Espinoza-Kulick et al. 2023), shows how fear of immigration enforcement already prevents many immigrants from accessing basic services. Policy reversals like this one only validate those fears and confirm what many immigrant families already believe: that the system is designed to exclude them. Such actions entrench social divisions and erode trust in government, health systems, and public institutions. The damage is not theoretical. It is measured in worsening health disparities, increased emergency care costs, and broken relationships between providers and immigrant communities.

We need immigration policies that affirm dignity, equity, and well-being. I urge USCIS to maintain the 2022 public charge rule and reject this proposed change. This is a step backwards in our collective responsibility to advance racial equity, public health, and social justice.

Respectfully,
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