 

**Refugee & Immigration Ministries**

5 Thomas Circle NW, Washington, DC 20005

*A Ministry of* ***Disciples Home Missions***

130 E Washington Street, Indianapolis, Indiana 46204

December 10, 2018

Ms. Samantha Deshommes

Chief, Regulatory Coordination Division Office of Policy and Strategy U.S. Citizenship and Immigration Services Department of Homeland Security 20 Massachusetts Avenue NW Washington, DC 20529-2140

**Re: DHS Docket No. USCIS-2010-0012, Comments in Response to Proposed Rulemaking: Inadmissibility on Public Charge Grounds**

To Ms. Deshommes:

I am writing as the Executive Director of Disciples Refugee & Immigration Ministries, in affiliation with Disciples Home Missions of the Christian Church (Disciples of Christ) in the United States and Canada. My communication is in response to the Department of Homeland Security’s proposed rule, “Inadmissibility on Public Charge Grounds.” I write to express our national ministry’s deep ethical and theological concerns, and to register our opposition to the proposed rule changes. Disciples Refugee & Immigration Ministries (RIM) is the national and General Ministry body which serves our denomination of over 600,000 members across the U.S., and Canada, to **respond to Jesus’ call to welcome the stranger through refugee resettlement, to minister with immigrants, and to engage in education and advocacy on behalf of immigrants and refugees. We provide resources for congregations, legal consultations, and connections to hands-on mission work in support of refugees and immigrants.**

**From the Hebrew texts of sacred scriptures where Abram migrated due to root causes of environment and famine, to the need for Moses’ family to take extreme measures to save their treasured son from sure death at the hands of Pharaoh, to the essential Exodus of the Israelites to survive as a community, and to the New Testament where Jesus’ own family fled to Egypt to escape death through the threats of Herod, our sacred scriptures throughout the Bible are filled with the experiences and challenges faced by migrants. Such prevalent texts inform our faith response in our own time to migrant families, and such stories of multiple immigrant figures combine also with repeated calls by our God to take care to respect the dignity and human rights of immigrants. Just one of many examples is found in** Leviticus 19:34 (CE), which reminds us: “Any immigrant who lives with you must be treated as if they were one of your citizens. You must love them as yourself, because you were immigrants in the land of Egypt; I am the LORD your God.” With this basis in our scriptures, RIM strongly rejects the proposed changes to Public Charge regulations on the following grounds:

**The Instruction of Our Faith to Welcome with Compassion and Respect All Made in the Image of God**

“Above all” urged the Apostle Peter in 1 Peter 4:8-9, “love each other deeply” and “offer hospitality to one another without grumbling.” Hospitality was a repetitive call, demonstrated in Genesis 18:1-19 when Abraham, Sarah, and their household raced from the door of the tent to greet and feed and honor unknown guests in the heat of the day. Throughout scriptures, the giving of such welcome was inextricably linked with demonstrating love for the Lord, such as in Matthew 25 when Jesus taught that “whenever you did not welcome the least of these” you also do not welcome Jesus. Further, the sharing of welcome for persons has likewise been emphasized as a practice which offers inherent and deep value to those who provide hospitality, such as in Hebrews 13:2, where the community of faith was reminded to “not forget to show hospitality to strangers, for by so doing some people have shown hospitality to angels without knowing it.”

With such a strong call, we believe deeply that our government must provide broad protections for children and families, regardless of citizenship. Further, as Christian faith teaches that the stamp of God is emblazoned upon the identity of each human being, it demands that each person’s unique gifts, abilities, and contributions must be deeply respected. As “God created humans in his own image…male and female God created them” (Genesis 1:27), therefore all immigrants and refugees who may be newcomers, as well as our oldest friends, must equally be shown respect and dignity.

The proposed Public Charge rules change, however, would instead broaden the long term meaning of Public Charge in a way which would do exactly the opposite of protecting families. Even since its announcement, the new definition has already instilled fear in immigrant families; some of whom have already removed themselves from the few benefits for which their family members are eligible. Also, rather than showing each person equal respect, the proposed regulation puts immigration status at risk if a person is not wealthy. It further seeks to punish potential immigrants who made have a health condition. And, the proposed rule change does not give equal opportunity for immigrants to obtain legal status if they have accessed public housing benefits—even if they have been accessed on only a temporary basis. It could further be argued that the proposed rule additionally discriminates against families which may have only one parent; recognizing that public housing and nutrition assistance often help allow a parent to go to work and/or to obtain education that raises their status step by step.

As a worker with immigrant and refugee communities for over twenty-five years, I have befriended families again and again whose families needed to access housing and/or food assistance temporarily. Such benefits often made it possible for parents to work more hours, and to gain education. Frequently, I have seen my immigrant and refugee neighbors leave behind such benefits, and instead become self-sufficient. Often, they have even become valedictorians in their own schools, and have ultimately been able to purchase high quality homes. Just one such example is the Bosnian woman who entered the U.S. 26 years ago, but just last month entertained my entire extended family in her lovely new home on the day after Thanksgiving. The proposed Public Charge rule could have denied her immigration status in the early years of life in the United States. Instead, she now serves as a deeply respected manager in the Hershey chocolate production company—where she is frequently called upon for her leadership and machinery expertise.

**Protection of the Vulnerable, and the Call of Our Faith to Protect Children and Value Families**

The call of sacred texts is also clear and repeated that those who seek to follow God must not keep the love of God to ourselves, but rather must share it with our neighbors, and in particular with those who are the most vulnerable. As [Psalm 82:3-4](https://www.biblegateway.com/passage/?search=Psalm+82%3A3-4&version=ESV) put it, followers of God are to “Give justice to the weak and the fatherless; maintain the right of the afflicted and the destitute. Rescue the weak and the needy; deliver them from the hand of the wicked.” Our call is to protect, to offer safety to those in need, and to encourage their safety and security. Proverbs 31:8-9 put it this way, reinforcing that believers are to “Open your mouth for the mute, for the rights of all who are destitute. Open your mouth, judge righteously, defend the rights of the poor and needy.” Further, while persons of all ages are to be protected as needed, there was a specific urging to ensure that the needs of children are cared for. Jesus showed his own love for children when, in Matthew 19:14, he asked for children to be brought to him and not held away from protection, when he said, “Let the little children come to me, and do not hinder them, for the kingdom of heaven belongs to such as these.”

Because the proposed Public Charge rule will also attempt to predict whether an immigrant could potentially —in the future—use public benefits, vulnerable families would be de-stabilized because of an ongoing fear that their case could be incorrectly assessed, and their future could be inaccurately predicted. Department of Homeland Security personnel will have to define the threshold likelihood on a case-by-case basis, creating uncertainty for applicants and leading to unwarranted denials for immigrants. This will put people’s lives and well-being at risk.

Our faith partners work all around the globe. This means we know the families and children who would be affected by this rule change. And especially, we are aware of the difficult conditions that have often provoked their journeys from their home countries. Many have already faced incredible challenges in hopes of seeking protection in the United States. The rule change would hurt already vulnerable children who had hope to find a safe place in our country. Our faith grounding has led my/our denomination to advocate for the highest protection standards to be applied to children and families seeking to immigrate. Our treatment of immigrant families in U.S. policy is a moral decision that speaks to who we are as a nation.

**Faith and Our Commitment to Offer Healing**

As Disciples, and in partnership with dozens of other national organizations and thousands of people of faith, we have signed letters, engaged in actions, contacted legislators, and raised our voices often to stand resoundingly in appreciation for our immigrant brothers and sisters.

We have done so, no matter the political party of any administration, because of our calling to offer healing to the brokenhearted and vulnerable. It is at odds with our faith values that immigrant families would be blocked from the opportunity to have a permanent, secure future in the United States. Rather than offering healing, the new Public Charge definition frightens immigrant families away from seeking access to health care. Since immigrants pay tax monies regularly, with every purchase made, the new rule would actually be frightening immigrants away from accessing healthy nutrition. Since one in four American children have at least one immigrant parent, millions of children could be adversely affected by the proposed Public Charge rule.

**Faith and Our Priority for Family Support**

In many faith traditions, family is the fundamental unit in society through which individuals are able to grow and experience the love of God. Our varied faith traditions also call on us to safeguard the wellbeing of children and ensure that children are cared for, provided the space to be free and learn and grow – to be loved. More than that, their vulnerability causes us to seek to be our best, knowing they are fully reliant on us. It is unconscionable and unfathomable then that we see the administration taking drastic efforts to significantly diminish the health of families; including discouraging women and families from accessing prenatal care, primary care, or nutrition assistance.

For each of the above reasons, and more, we therefore register these comments in opposition to the proposed changes to the Public Charge definition.

Sincerely,



Rev. Dr. Sharon Stanley-Rea,

Director

Disciples Refugee & Immigration Ministries

U.S. and Canada

***Refugee and Immigration Ministries*** *equips Disciples to respond to Jesus’ call to welcome the stranger through refugee resettlement, ministering with immigrants, and advocacy. We provide resources for your congregation, legal consultations, and connections to hands-on mission work. Since 1949, The Christian Church (Disciples of Christ) has resettled more than 39,000 refugees, assisted countless people facing immigration problems, and advocated for humane borders and rights of immigrants. For further information, see* [*www.discipleshomemission.org*](http://www.discipleshomemission.org)*, or contact: Rev. Dr. Sharon Stanley-Rea, Director,* *sstanley@dhm.disciples.org**, 202-957-7826, or*

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