



CITY OF HOUSTON

Sylvester Turner

Mayor

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Hon. Mick Mulvaney
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Attention: DHS Docket No. USCIS-2010-0012

Thank you for your consideration of my comments on the proposed change to the public charge ground of inadmissibility (83 FR 51114) on behalf of the City of Houston. One of four Houstonians is foreign-born – a population that includes naturalized citizens, legal permanent residents, people with temporary visas and people without legal immigration status. As mayor, I represent and seek to serve all of them, and have grave concerns about this proposal's impact on people presently in Houston or seeking to come to Houston to obtain and maintain the benefits of legal permanent residence. However, this proposal's impact would extend beyond Houston's immigrant community. If implemented, it would negatively impact the public safety of all Houstonians. It would also harm the economy of the City, which will have a rapid effect on the economy of the entire nation. I strongly urge the Administration to reconsider this proposal.

The proposal will cause fear and alarm among the immigrant community that will cause them to forgo city services, even including services that would not be affected by the proposal's implementation. In 2017, the State of Texas passed a law targeting so-called "sanctuary cities." The state law had no impact on the operations of the Houston Police Department (HPD). However, the fear of the law had an immediate impact on Houstonians. HPD saw a 16 percent drop in domestic violence reports from the Hispanic community in 2017 compared to 2016. The decrease in reports was not the result of a decrease in domestic violence incidents, but rather the result of people who were unwilling to report these incidents for fear of interaction with law enforcement.

Immigration laws are complex, and there is little understanding beyond those who work in the field of where enforcement begins and ends. The Texas law did not require or even encourage police officers to inquire into the immigration status of those reporting crimes. However, there was little understanding of the exact legal repercussions of the law, and instead just a broader understanding that the State had passed a law that connected law enforcement with deportation. As a result, an untold number of crime victims felt unable to seek justice and unable to extricate themselves from dangerous situations. The proposal in question will lead similarly lead to noncitizens not seeking to city services, due to both the actual and perceived impact of accessing those services to a person's immigration status.

Stephen Williams, director of the Houston Health Department, and Dr. David Persse, medical director of the Houston Fire Department, which includes emergency medical services, have separately submitted comments to the Administration that pertain specifically to health concerns and the impact of the proposal on health services. I will highlight from their comments that the proposed change will curtail vital efforts for preventative care, resulting in higher utilization of costly taxpayer-funded emergency services and the inability to effectively investigate, control and stop outbreaks of communicable diseases, both of which will have an impact on all Houstonians.

This proposal's inclusion of housing vouchers and other housing assistance as a negative factor for admission will cause an increase in housing instability, as people concerned about their present and future immigration status refuse to participate in housing assistance administered by the Houston Department of Housing and Community Development. New data from the Centers for Disease control highlight that the rate of disability drastically increases as poverty increases. By creating fear around participating in public anti-poverty programs, the proposed public charge rule will lead to an increase in disability and negative health impacts for an already vulnerable community of people. Eighty-nine percent of households using federal rental assistance in the United States include children, people who are elderly, or people with disabilities, and, according to a study released earlier this year from Boston Medical Center, caregivers of children in low-income unstable housing are twice as likely as those in stable housing to be in fair or poor health. Children aged four and younger are nearly 20 percent more likely to be hospitalized and are more than 25 percent more likely to experience developmental delays. The proposed rule will force noncitizens to choose between accessing benefits for which they are eligible and maintaining their immigration status, directly impacting thousands of immigrant families' access to housing and other assistance programs which provide economic stability and opportunity.

Utilization of the Supplemental Nutritional Assistance Program (SNAP) and WIC as negative factors for admission will lead to food instability, causing negative health and economic impacts. One in five households that utilize SNAP have a family member with a disability. As fewer

families enroll in these programs, childhood malnourishment, sickness, and developmental delays will increase as children will be denied access to healthy food.

More than 300,000 households in Houston utilize SNAP, bringing in \$82 million in 100 percent federally funded benefits. Use of these benefits generates \$147.5 million in economic activity. If this rule change is implemented and leads to just 20 percent of families disenrolling in SNAP, the direct economic impact of just this one program's inclusion could cause a nearly \$30 million impact on Houston's economy.

These are just some small examples of the economic impact of the proposed public charge rule. The key factor this change would affect is stability – in health, housing, nutrition and many other factors. This change would destabilize a large and important segment of the population in the Houston area. According to New American Economy, immigrants in the Houston region pay \$12.7 billion in taxes to federal, state and local governments. They spend more than \$38 billion. Destabilizing their lives will have the effect of destabilizing their income, which will negatively impact the Houston economy. And that will impact the national economy, as any slowdown in Port Houston or the medical or petrochemical industries that thrive in Houston will have a trickle-down effect on the nation.

On behalf of the City of Houston, I strongly urge against implementation of 83 FR 51114 to avoid the severe consequences to public safety and the economy this change would have on all Houstonians.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sylvester Turner', written in a cursive style.

Sylvester Turner
Mayor