

December 10, 2018

Dear Maine Delegation Members:

The Maine Primary Care Association (MPCA), and the Maine Immigrants' Rights Coalition (MIRC), wish to share our thoughts on the rulemaking known as the "Public Charge." MPCA is a statewide organization that works closely with the state's 20 community health centers to ensure access to quality and affordable health care for all in need, regardless of insurance status or ability to pay. In fact, the health center model and mission is to ensure access to affordable health care so that all individuals can contribute to their communities and reach their full potential. As currently drafted, this proposed rule is in direct contrast to this mission. MIRC's mission is to improve the legal, social and economic conditions experienced by Maine's immigrants – enhancing their lives while strengthening Maine – through advocacy, information sharing and collaboration both through and among our member organizations. We represent 56 member organizations including immigrant constituency groups, advocacy groups, direct service organizations and grassroots community organizations.

Maine has a small but growing immigrant population. Economic and demographic data show that without immigrants, Maine's population since 2010 would have dropped in all counties and cities. Immigrants have stemmed the severity of Maine's population loss, and have even caused slight net increases in population in Cumberland and Androscoggin counties. Maine's recent immigrants are entrepreneurs, workers, volunteers, consumers and taxpayers, and contribute greatly to this state, as immigrants always have. If Maine is to thrive, immigrants must be able to continue to come to the U.S. and to Maine without threat of backlash for using services.

As you are most likely aware, recently the Administration has issued a proposed regulation that expands the definition of "public charge" and puts the health and well-being of immigrant families at great risk. Both MPCA and MIRC have concerns that the rulemaking will create circumstances that cause non-citizens to put off care, ultimately putting public health at risk, while driving up the cost of care as those individuals seek treatment in urgency and emergency settings. As we see it, the rule—if implemented as proposed—will likely result in individuals, including those seen at health centers, being deterred from addressing their health care needs, ultimately leading to worsening health outcomes for them and their communities. This deterrence has the potential to raise the cost of care for those individuals and for society as a whole. As proposed, the public charge definition creates a strong incentive for non-citizens to wait until their health problems become emergency, leading to worse health outcomes, increased use of ERs and urgent care, as well as an increase in the prevalence of communicable diseases. For example, the inclusion of SNAP and housing subsidies in the list of benefits that can render one a public charge means that many immigrants will avoid critical programs that can improve the social determinants of health.

Finally, both MIRC members and MPCA members have already noted that the proposed rules are having a chilling effect among immigrants who are exempt but who are not informed fully about the policy nuances. We have heard that CHC patients and community members alike are deciding already to forgo supports for which they are eligible, and which may not be included in

the public charge arena, such as the critical WIC program. Along these same lines, we feel strongly that the Children's Health Insurance Program (CHIP) definitely should not be considered in the determination of public charge as doing so will discourage parents from seeking health care for their children.

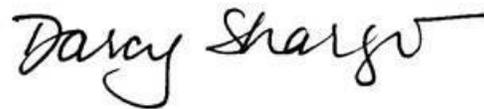
Overall—as pointed out by the US Conference of Mayors—the proposed changes to the definition of public charge are a danger to “children’s health, nutrition, and development; impact access to health care; reduce housing options; and negatively affect our local economies. It will force families to choose between the help they need and the people they love. Further, by disrupting many people’s pathways to citizenship, the proposed rule would also deprive immigrants and cities alike of the well-documented benefits of naturalization on earnings, employment, and homeownership.” Given the high stakes presented in this change, we ask that as our federal delegation, you partner with both MPCA and MIRC to ensure that we do not put Maine people at risk. The proposed rule change is already creating fear and anxiety, and MIRC members have reported Maine families afraid to apply for programs like WIC. MIRC, as the leading voice advocating for immigrants in Maine, knows that healthy and thriving immigrant communities contribute to the well-being of the state.

We look forward to meeting with you and discussing ways to mitigate the impact of this rulemaking.

Sincerely,



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