



TRUMP ADMINISTRATION’S “PUBLIC CHARGE” RULE

“Technical” Fact Sheet for Housing and Homelessness Advocates

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On August 14, 2019, the U.S. Department of Homeland Security (DHS) published its final rule “Inadmissibility on Public Charge Grounds” in the Federal Register. The rule changes the way in which the agency determines whether an immigrant is likely to become a “public charge.”

This rule directly affects immigrants and their families applying for, receiving, or deemed likely to receive public housing and Section 8 rental assistance. The rule departs from longstanding immigration policy by making it more likely for certain immigrants to be determined to be public charges because they have received, currently receive, are approved to receive, or are deemed likely to receive in the future certain kinds of public benefits.

This fact sheet highlights what housing and homelessness advocates should know about the public charge rule and how they can fight back.

What is a public charge?	2
Who would be affected by the rule?	2
Which housing programs are covered by the rule?	3
How will the use of housing benefits be evaluated?	3
How is a public charge determination made for individuals seeking admission or LPR status?	4
How is a determination made for individuals seeking an extension of stay or change of status?	5
Will an applicant’s dependents’ use of housing benefits count against the applicant?	5
How does the rule affect the use of housing and homeless assistance programs?	5
When would this rule be in effect?	6
What should I tell clients and others who are worried about this rule?	6
What can I do?	7
Where can I get more information?	7

What is a public charge?

Currently, a “public charge” is defined as a person who is “primarily dependent on the government for subsistence, as shown by either the receipt of public cash assistance or institutionalization for long-term care at the government’s expense” (emphasis added). The new rule changes this definition to include any applicant who uses or receives, or is likely to use or receive, one or more public benefits, including certain non-cash benefits.ⁱ The rule provides an exclusive list of benefits that would be considered in a public charge determination, including Section 8 Housing Choice Vouchers, Project-based Section 8 Rental Assistance, and Public Housing. For a full list of covered programs, see Table 2 of this fact sheet.

Who would be affected by the rule?

The rule applies to noncitizens who are applying for lawful permanent resident (LPR) status, individuals seeking an extension of stay or changes to their non-immigrant status, and immigrants seeking admission into the United States. The rule will mostly affect individuals that are seeking LPR status through a family-based visa petition. Additionally, in a change from the proposed rule, individuals seeking an extension of or change to their non-immigrant status will be subjected to a slightly different test than individuals seeking admission or LPR status (see the section below on “How is a determination made for individuals seeking an extension of stay or change of status?”).

Some immigrants will not be subject to the public charge rule. These immigrants include refugees, asylees, survivors of trafficking and other serious crimes, self-petitioners under the Violence Against Women Act, special immigrant juveniles, certain people who have been paroled into the U.S., several other categories of noncitizens, as well as lawful permanent residents applying for U.S. citizenship.

Note that the Public Housing and Section 8 programs are already subject to immigration status eligibility requirements under Section 214 of the Housing and Community Development Act.ⁱⁱ Therefore, only certain categories of noncitizens are eligible for these programs. Table 1 examines the categories of immigrants eligible to receive Public Housing and Section 8 and whether these immigrants would be subject to public charge determinations.

Table 1 – Comparison: Eligibility for Housing Assistance and Public Charge Exemptions	
Immigrants Eligible for Public Housing and Section 8 Programs	Subject to the Public Charge Test?
Lawful Permanent Residents. ⁱⁱⁱ	No (with limited exceptions). ^{iv}
Immigrants granted lawful permanent residence through registry under section 249 of the Immigration and Nationality Act (8 U.S.C. § 1259). ^v	No (with limited exceptions). ^{vi}
Asylees. ^{vii}	No. ^{viii}
Refugees. ^{ix}	No. ^x

Parolees. ^{xi}	Potentially (if they adjust their status through a pathway subject to the public charge test, e.g. a family-based petition). ^{xii}
Granted Withholding of Removal. ^{xiii}	Potentially (if they adjust their status through a pathway subject to the public charge test, e.g. a family-based petition). ^{xiv}
Immigrants admitted for permanent residence under section 245A of the Immigration and Nationality Act [8 USCS § 1255a]. ^{xv}	No (with limited exceptions). ^{xvi}
Immigrants admitted for temporary residence under section 245A of the Immigration and Nationality Act [8 USCS § 1255a]. ^{xvii}	No (with limited exceptions). ^{xviii}
Immigrants lawfully admitted pursuant to section 141 of the Compacts of Free Association with the Marshall Islands, the Federated States of Micronesia, and Palau (COFA) (48 U.S.C. 1931 note). ^{xix}	Potentially (if a COFA noncitizen leaves the country they can be subject to a public charge determination upon re-entry, or if they adjust their status through a pathway subject to the public charge test, e.g. a family-based petition). ^{xx}
Violence Against Women Act (VAWA) Self-Petitioners. ^{xxi}	No. ^{xxii}
Immigrants that seek, or have received, official T-visa status as a Survivor of Trafficking. ^{xxiii}	No. ^{xxiv}

Which housing programs are covered by the rule?

The rule will only apply to public benefits programs that are specifically enumerated in the rule.^{xxv} The rule explicitly includes three federal housing programs:

- Section 8 Housing Choice Voucher Program,^{xxvi}
- Project-Based Section 8 Rental Assistance,^{xxvii} and
- Public Housing.^{xxviii}

The rule would cover the Section 8 Moderate Rehabilitation program.

Although the final rule does not address this issue—other federal, state, and local housing programs may be implicated where layers of subsidies, including one of the explicitly mentioned programs, are used to make units affordable to very low-income families.

How will the use of housing benefits be evaluated?

While the proposed version of the rule had a complicated system of calculating “monetizable” versus “nonmonetizable” benefits, the final rule has simplified these calculations so that all benefits use (regardless of program type) are weighted equally. Under the final rule, an individual will be defined as a public charge if they received any of the listed benefits for more than 12 months in the aggregate within a 36-month period. The applicant’s receipt of two non-monetized benefits in the same month, such as

public housing and Medicaid, will count as two months. **This means an individual could potentially reach the 12-month threshold in as little as 3-4 months depending on the number of programs they are enrolled in.**

Furthermore, in a dramatic shift from the proposed rule, under the final rule USCIS agents will now consider ***any use of benefits by an applicant in the totality of circumstances evaluation***. This means that any use of the public benefits covered by the rule will be weighed as a negative factor against an applicant, even if their use falls below the 12-month threshold.

The final rule affirms the proposed rule's stance that only the portion of benefits that are attributable to an applicant will be taken into consideration in an individual's public charge determination. The final rule has clarified this position by adding a new definition for "Receipt of public benefits" which specifies that an "alien's receipt of, application for, or certification for public benefits solely on behalf of another individual does not constitute receipt of, application for, or certification for such alien."^{xxxix}

This means that an applicant will not be harmed by their children's use of benefits, and that immigrants living in mixed-status households where they do not receive benefits on their own behalf can continue to maintain their children and other family members' benefits without fear of harming their own immigration status.^{xxx}

An applicant's use of non-cash benefits (including all of the housing programs) that predates the effective date of the final rule will not be considered in an individual's public charge determination. Use of housing programs will only be considered starting October 15, 2019. (See below for more information on the effective date of the rule.)

How is a public charge determination made for individuals seeking admission or LPR status?

Federal law currently requires immigration officials to look at multiple factors, including the noncitizen's age, health, income, assets, family status, education, and skills, and they may also consider whether an applicant has submitted a sufficient affidavit of support (a contract where the petitioning relative, and in some cases a joint sponsor, promises to support the immigrant at 125% of the federal poverty level). This totality of circumstances test allows immigration officials to consider whether the person has used or relied primarily on (1) public cash assistance or (2) long-term government-funded institutionalization or is likely to rely on those programs in the future.

DHS's new rule maintains the existing factors considered in a public charge determination and further examines certain factors that the agency would weigh negatively or positively when making a public charge determination. For example, negative factors would include not being proficient in English, having a bad credit score, earning less than 125% of the Federal Poverty Guidelines (FPG), being a child or a senior, having certain medical conditions without access to private health insurance, and lacking a high school diploma. A positive factor would be having an income of over 250% FPG or having private unsubsidized health insurance.

The final rule further broadens the definition of public charge to consider whether an applicant uses, receives, has been approved to receive, or is deemed likely to use in the future cash assistance or

certain other assistance from the government, such as housing, health care, and nutrition programs. The rule would weigh the use or approval of use of benefits above a specified threshold as a heavily weighted negative factor. However, benefits that were not considered under the prior public charge policy would be weighed only if those benefits are received on or after the rule's effective date, **October 15, 2019**.

Although not counted as a "heavily weighted negative factor," DHS will consider any amount of the newly listed benefit programs used after the effective date as a negative factor in the totality of the circumstances evaluation. That being said, most immigrants applying for a green card are not eligible for these benefits.

DHS has confirmed in the final rule that the public charge determination of an individual immigrant will only examine the immigrant's personal use of these benefits—**children's use of these benefits will not be counted against their parents.**^{xxxii}

The sponsor's affidavit of support would be relevant (and, in many cases, required) but would not be sufficient on its own to overcome a public charge barrier. However, a finding of an insufficient affidavit of support will result in the immigrant being found inadmissible regardless of any other evidence the immigrant may submit.^{xxxiii}

How is a determination made for individuals seeking an extension of stay or change of status?

Under existing policy, non-immigrants who seek an extension or a change of their non-immigrant status are not subject to a public charge determination. The new rule will examine whether these individuals have used the listed benefits for more than 12 months in the 36 month period while in non-immigrant status.

The test will not consider whether these individuals are likely to use public benefits in the future. And non-immigrants who seek an extension of their status are generally ineligible for the benefits listed in the rule.

Will an applicant's dependents' use of housing benefits count against the applicant?

The rule **will not consider whether an applicant's dependents, including immigrant and U.S. citizen children, receive housing subsidies.** However, if a child is applying for status themselves, any subsidy that they receive would be weighed against them in a public charge test. DHS has confirmed in their final rule that mixed-status families are not targeted under the rule, and that only an individual's use of benefits will be considered in their public charge determination.^{xxxiii}

How does the rule affect the use of housing and homeless assistance programs?

As discussed above, **the rule explicitly includes only three federal housing programs: Section 8 Housing Choice Voucher Program, Project-Based Section 8 Rental Assistance, and Public Housing.** The final rule does not include homeless assistance programs.

The rule will have a chilling effect on immigrant families not subject to the rule and would undermine the goal of self-sufficiency. This rule has increased the panic, fear, and confusion already felt by millions of immigrant families across the country due to the Trump Administration's ongoing anti-immigrant rhetoric and policies. Regardless of whether they are technically subject to the rule, this policy change will deter many eligible immigrant families from seeking much-needed housing and homelessness benefits. Those already participating in these programs will believe they are compelled to give up the lifeline assistance that keeps their families one step away from homelessness. Studies have shown that unstable housing situations can cause individuals to experience increased hospital visits, loss of employment, and mental health problems.^{xxxiv} Having safe and stable housing is crucial to a person's good health, sustaining employment, and overall self-sufficiency. The rule threatens to undermine the overall well-being of low-income immigrants and their families.

The rule will exacerbate child poverty and homelessness. The rule will have dire effects on health and educational outcomes for the children of immigrants, hampering economic mobility, increasing child and family poverty, and undercutting ongoing efforts to prevent and end homelessness.^{xxxv} Programs such as SNAP and the Housing Choice Voucher program help support children and families on their path to self-sufficiency, and open up educational and economic opportunities in the long-term, especially for individuals who received assistance as young children.^{xxxvi} Such a rule is likely to trap low-income immigrant families in intergenerational poverty, and harm society and the economy in the process.^{xxxvii}

When would this rule be in effect?

DHS published the final rule in the Federal Register, on August 14, 2019, which began the tolling of the 60-day grace period before the rule will go into effect. **The rule is scheduled to go into effect for immigration applications postmarked or submitted electronically on or after October 15, 2019.** Use of non-cash benefits (other than long-term care) before October 15, 2019 will not be considered in an applicant's public charge determination.

As of right now the effective date for the rule is October 15th, but several law suits have been filed to try to block or delay implementation of the final rule, so there is a possibility that the effective date will be pushed back further or that the rule will be rescinded entirely.

What should I tell clients and others who are worried about this rule?

Although this rule is a horrible threat to immigrants and their families, there are several important points to keep in mind:

- Some immigrants are exempt from the rule based on their immigration status (e.g. asylees, refugees)—it is therefore important to consult with an immigration attorney to find out if the rule applies to any given individual
- Some benefits are exempt – for example, Medicaid by pregnant women or children under 21, and emergency Medicaid won't be considered under the rule; state-funded benefits other than cash assistance won't be counted.
- Only the use of benefits by the individual seeking status will be considered under the rule—other family members' use of benefits will not be considered in an individual's public charge determination.

- Only the enumerated benefits will be considered in public charge determinations –
- Most immigrants subject to the rule are receiving benefits that are not counted under the rule]
- Every situation is different—individuals should consult with an immigration attorney to determine what the best option is for their family. This online directory can help you search for local nonprofits that provide legal help and advice: [ImmigrationLawHelp.org](https://www.immigrationlawhelp.org).

What can I do?

We are working closely with the Protecting Immigrant Families (PIF) Campaign, led by the National Immigration Law Center and the Center for Law and Social Policy, to coordinate advocacy efforts.

- You should educate state and local policy makers about how this rule will have negative effects on housing and homelessness by using client stories and data on how immigrants are served by homelessness and housing benefits.

Where can I get more information?

The Protecting Immigrant Families Campaign's [website](#) has up-to-date resources on the public charge rule and related policies. This [fact sheet](#) created by the Protecting Immigrant Families Campaign has more details regarding the final public charge rule.

For further assistance, please contact Karlo Ng at kng@nhlp.org, or Arianna Cook-Thajudeen at acooktha@nhlp.org.

Table 2: Comparison Chart between Final Public Charge Rule and Current Guidance

Source: Updated version of a chart created by the Kaiser Family Foundation

	Current Public Charge Policy (Based on 1999 Field Guidance)	Final Rule
Definition of Public Charge	A noncitizen who has become or who is likely to become “primarily dependent on the government for subsistence, as demonstrated by either the receipt of public cash assistance for income maintenance or institutionalization for long-term care at government expense.”	A person who uses or receives one or more public benefits. “Public benefits” are limited to a list of specific programs enumerated in the rule. This list includes federal, state, or local cash assistance, and certain federal non-cash benefits (for a list, see below under “Benefits that May be Considered”).
Consideration of Use of Public Benefits in a Public Charge Determination	• May take into consideration past and current receipt of cash public assistance for income maintenance or institutionalized long-term care • No weight should be placed on receipt of non-cash benefits or receipt of cash benefits for purposes other than income maintenance	May consider: • Whether a person uses or receives a covered public benefit • Whether a person has used or received a covered public benefit on or after October 15, 2019 [use of cash benefits or institutionalized long-term care prior to that date will be considered under the prior policy] • Whether an individual has applied, been approved, or certified for receipt of a covered public benefit
Consideration of Use of Public Benefits by Children and Other Family Members in a Public Charge Determination	• Cash benefits received by children or other family members should not be attributed to the individual, unless the family member’s benefits are the family’s sole source of support.	• Will not count the use of benefits by dependents, including U.S. citizen children, against the applicant.
Benefits that may be considered for public charge determinations (non-exhaustive list)	• SSI • TANF • State/local cash assistance programs • Public assistance for long-term care in an institution (including Medicaid)	• Cash Benefits - o SSI - o TANF - o Federal, State or local cash assistance programs for income maintenance • Non-Cash Benefits - o SNAP (formerly Food Stamps) - o Section 8 Housing Choice Voucher Program - o Section 8 Project-Based Rental Assistance - o Public Housing - o Medicaid (with exceptions for emergency services, and coverage of children under age 21 and pregnant women)

		o Institutionalized long-term care
Examples of Benefits that may not be considered for public charge determinations	• Medicaid and other health insurance and health services (except for institutional long-term care) • CHIP • Nutrition programs, including SNAP (formerly Food Stamps), WIC, the National School Lunch and Breakfast program, and other supplementary and emergency food assistance programs • Housing benefits • Child care services • Energy assistance, such as LIHEAP • Emergency disaster relief • Foster care and adoption assistance • Educational assistance, including Head Start • Job training programs • In-kind community-based programs • State and local programs • Earned cash payments (e.g., Social Security, veteran's benefits) • "Special purpose" cash benefits or any other non-cash benefit programs	• All public benefits not enumerated in the rule will not be subject to public charge determinations

ⁱ The rule defines "public benefits" as

"(1) Any Federal, State, local, or tribal cash assistance for income maintenance (other than tax credits), including:

- (i) Supplemental Security Income (SSI), 42 U.S.C. 1381 et seq.;
- (ii) Temporary Assistance for Needy Families (TANF), 42 U.S.C. 601 et seq.; or
- (iii) Federal, State or local cash benefit programs for income maintenance (often called "General Assistance" in the State context, but which also exist under other names); and

(2) Supplemental Nutrition Assistance Program (SNAP), 7 U.S.C. 2011 to 2036c;

(3) Section 8 Housing Assistance under the Housing Choice Voucher Program, as administered by HUD under 42 U.S.C. 1437f;

(4) Section 8 Project-Based Rental Assistance (including Moderate Rehabilitation) under Section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f); and

(5) Medicaid under 42 U.S.C. 1396 et seq., except for:

- (i) Benefits received for an emergency medical condition as described in 42 U.S.C. 1396b (v)(2)-(3), 42 CFR 440.255(c);
- (ii) Services or benefits funded by Medicaid but provided under the Individuals with Disabilities Education Act (IDEA) 20 U.S.C. 1400 et seq.;
- (iii) School-based services or benefits provided to individuals who are at or below the oldest age eligible for secondary education as determined under State or local law;

(iv) Benefits received by an alien under 21 years of age, or a woman during pregnancy (and during the 60-day period beginning on the last day of the pregnancy).

(6) Public Housing under section 9 of the U.S. Housing Act of 1937.”

ii 42 U.S.C. § 1436a.

iii 42 U.S.C. § 1436a(a)(1).

iv Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,465 (Aug. 14, 2019) (“To be clear aliens who are already lawful permanent residents of the United States are not applying for adjustment of status extension of stay, or change of status, and therefore generally, will not be directly affected by the rule.”)(LPRs may be subjected to a Public Charge inadmissibility determination if they leave the U.S. for more than 180 days and then seek admission upon reentry).

v 42 U.S.C. § 1436a(a)(2).

vi Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,504 (Aug. 14, 2019) (to be codified at 8 C.F.R. § 212.23(a)(11)). Limited exceptions may apply to individuals who leave the U.S. for more than 180 days and then seek admission upon reentry.

vii 42 U.S.C. § 1436a(a)(3).

viii Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,504 (Aug. 14, 2019) (to be codified at 8 C.F.R. § 212.23(a)(2)).

ix 42 U.S.C. § 1436a(a)(3).

x Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,504 (Aug. 14, 2019) (to be codified at 8 C.F.R. § 212.23(a)(1)).

xi 42 U.S.C. § 1436a(a)(4).

xii Note that this category of immigrants was not directly addressed in the final rule, but was specifically addressed in the proposed rule. See, Inadmissibility on Public Charge Grounds, 83 Fed. Reg. 51114, 51127 n.70 (proposed Oct. 10, 2018) (to be codified at 8 C.F.R. pts. 103, 212, 213, 214, 245, and 248) (“While an alien paroled into the United States is not subject to an admission determination at the time the decision to parole the alien is made, if an alien who has been paroled into the United States is applying for an immigration benefit for which admissibility is required, e.g. adjustment of status, the parolee will be subject to section 212(a)(4) of the Act in the context of seeking the subsequent immigration benefit.”). However, certain subsets of parolees have an independent pathway to LPR status and may be exempt from public charge.

xiii 42 U.S.C. § 1436a(a)(5).

xiv Note that this category of immigrants was not directly addressed in the final rule, but was specifically addressed in the proposed rule. See, Inadmissibility on Public Charge Grounds, 83 Fed. Reg. 51114, 51127 (proposed Oct. 10, 2018) (to be codified at 8 C.F.R. pts. 103, 212, 213, 214, 245, and 248) (indicated in second column, fifth row, of Table 2). A public charge determination will not be made when the decision to withhold removal is made. However, since this category of immigrant does not have an independent avenue for seeking LPR status, when individuals from this category seek a change of status, they are subject to the public charge rule depending on the pathway to status they take (e.g. a family-based visa petition).

xv 42 U.S.C. § 1436a(a)(6).

xvi This category of immigrant is from the Immigration Reform and Control Act of 1986. LPRs, including those who secured status under this law, are generally not subject to a public charge determination. Limited exceptions may apply to individuals that leave the U.S. for more than 180 days and then seek admission upon reentry.

xvii 42 U.S.C. § 1436a(a)(6).

xviii Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,345 (Aug. 14, 2019) (indicated in second column, fourth category of Table 7). While there aren’t many people left in this category - it’s possible if a person is still appealing a very old case, they could be subject to specific public charge rules when they apply for adjustment of status unless the applicant is or was an aged, blind, or disabled individual; see 8 U.S.C. § 1255a(d)(2)(B)(ii)(IV).

xix 42 U.S.C. § 1436a(a)(7).

xx Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,332-333 (Aug. 14, 2019). COFA migrants are not exempted under the rule, and may be subject to public charge determinations if they seek reentry into the US.

xxi Memorandum from Tonya Robinson, HUD Acting General Counsel, to Julian Castro, HUD Secretary re: Eligibility of Battered Noncitizen Self-Petitioners for Financial Assistance Under Section 214 of the Housing and Community Development Act of 1980 (Dec. 15, 2016).

xxii Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,505 (Aug. 14, 2019) (to be codified at 8 C.F.R. § 212.23(a)(20))

^{xxiii} 22 U.S.C. § 7105(b)(1)(A).

^{xxiv} Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,505 (Aug. 14, 2019) (to be codified at 8 C.F.R. § 212.23(a)(17)).

^{xxv} Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,387 (Aug. 14, 2019) (“Only public benefits as defined in 8 CFR 212.21(b) will be considered in the public charge inadmissibility determination.”).

^{xxvi} Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,501 (Aug. 14, 2019) (to be codified at 8 C.F.R. § 212.21(b)(3)).

^{xxvii} Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,501 (Aug. 14, 2019) (to be codified at 8 C.F.R. § 212.21(b)(4)).

^{xxviii} Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,501 (Aug. 14, 2019) (to be codified at 8 C.F.R. § 212.21(b)(6)).

^{xxix} Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,502 (Aug. 14, 2019) (to be codified at 8 C.F.R. § 212.21(f)).

^{xxx} Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,370 (Aug. 14, 2019) (“The valuation of the public benefits is an individual determination and receipt of public benefits by other members of a household including U.S. citizens will not be considered in an applicant’s public charge inadmissibility determination.”).

^{xxxi} Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,502 (Aug. 14, 2019) (to be codified at 8 C.F.R. § 212.21(e)) (“An alien’s receipt of, application for, or certification for public benefits solely on behalf of another individual does not constitute receipt of, application for, or certification for such alien.”).

^{xxxii} Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,309 (Aug. 14, 2019).

^{xxxiii} Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41,292, 41,370 (Aug. 14, 2019) (in addressing a comment concerned that mixed-status families will be punished for their family members use of benefits, DHS confirmed that the “valuation of the public benefits is an individual determination and receipt of public benefits by other members of a household including U.S. citizens will not be considered in an applicant’s public charge inadmissibility determination.”).

^{xxxiv} E.g., Meredith Horowki, *Housing Instability and Health: Findings from the Michigan Recession and Recovery Study*, National Poverty Center Policy Brief #29 (March 2012),

http://www.npc.umich.edu/publications/policy_briefs/brief29/NPC%20Policy%20Brief%20-%2029.pdf;

Matthew Desmond and Carl Gershenson, *Housing and Employment Insecurity Among the Working Poor*, Soc. Problems 1 (2016), available at

<http://scholar.harvard.edu/files/mdesmond/files/desmondgershenson.sp2016.pdf?m=1452638824http://pediatrics.aappublications.org/content/early/2018/01/18/peds.2017-2199> (finding that housing instability can lead to employment insecurity).

^{xxxv} See Will Fischer, *Research Shows Housing Vouchers Reduce Hardship and Provide Platform for Long-Term Gains Among Children*, Center on Budget and Policy Priorities (October 7, 2015),

<https://www.cbpp.org/research/research-shows-housing-vouchers-reduce-hardship-and-provide-platform-for-long-term-gains>; see also Linda Giannarelli et al., *Reducing Child Poverty in the US: Costs and Impacts of Policies Proposed by the Children’s Defense Fund* (Jan. 2015), available at

<http://www.childrensdefense.org/library/PovertyReport/assets/ReducingChildPovertyintheUSCostsandImpactsofPoliciesProposedbytheChildrensDefenseFund.pdf>.

^{xxxvi} See Kristin F. Butcher, *Assessing the Long-Run Benefits of Transfers to Low-Income Families*, Brookings Metro (January 2017), https://www.brookings.edu/wp-content/uploads/2017/01/wp26_butcher_transfers_final.pdf

(citing findings that there were long-term improvements in income and educational outcomes for individuals who received housing assistance as young children that transferred them to lower poverty neighborhoods); Sandra J. Newman et al., *The Long-Term Effects of Housing Assistance on Self-Sufficiency*, U.S. Department of Housing and Urban Development (December 1999), <https://www.huduser.gov/portal/Publications/pdf/longterm.pdf>;

Katie Hamm et al., *The Trump Plan to Cut Benefits Threatens Children*, Center for American Progress (Apr. 10, 2018), <https://www.americanprogress.org/issues/early-childhood/reports/2018/04/10/449262/trump-plan-cut-benefit-programs-threatens-children/>;

Leila Schochet, *Trump’s Immigration Policies are Harming American Children*, Center for American Progress (July 31, 2017), <https://www.americanprogress.org/issues/early-childhood/reports/2017/07/31/436377/trumps-immigration-policies-harming-american-children/>;

Peter A. Tatian & Christopher Snow, *The Effects of Housing Assistance on Income, Earnings and Employment*, 8 Cityscape: A Journal Of Policy and Development and Research 135, 158 (2005).

<https://www.huduser.gov/periodicals/cityscape/vol8num2/ch7.pdf> (finding evidence that benefiting from housing assistance increases income and earnings for certain groups).

^{xxxvii}Cesar M. Estrada, *How Immigrants Positively Affect the Business Community and U.S. Economy*, Center for American Progress (June 22, 2016), <https://www.americanprogress.org/issues/immigration/news/2016/06/22/140124/how-immigrants-positively-affect-the-business-community-and-the-u-s-economy/>.