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Public Comment to the **U.S. Citizenship and Immigration Services (USCIS)**
on Proposed Rule: **Inadmissibility on Public Charge Grounds**

(ID: USCIS-2010-0012-0001)

By **Margaret Purvis** on behalf of **Food Bank For New York City**

On behalf of Food Bank For New York City, I am writing to strongly oppose the proposed changes to the “public charge” test (DHS Docket No. USCIS-2010-0012-0001) that would build walls around accessing needed food (via the Supplemental Nutrition Assistance Program, also known as SNAP), healthcare, and housing for immigrants and their families.

Already, the anti-immigrant stance found in this proposal has instilled fear into our communities. This fear is not without merit and has already resulted in immigrants and their children avoiding legal access to vital services that they are eligible to receive. Reports from across the City and country indicate that individuals are declining SNAP and other benefits out of concern that it will negatively influence their application for legal immigration. Research shows that the reduction or loss of access to SNAP not only increases food insecurity but pushes more people onto the lines of food pantries and soup kitchens. Since 2013’s across the board “Hunger Cliff” cuts, emergency food providers in New York City have seen an increase in needy New Yorkers visiting their programs. A recent survey of our network shows that 80% of emergency food providers continue to see more visitors to their programs since the Hunger Cliff.¹

The emergency food network works in tandem with SNAP, but cannot replace it. SNAP is the foundation of our national anti-hunger response providing food assistance to approximately 1.6 million New York City residents. However, SNAP and other household resources alone do not always provide enough meals for all members of our community. The average SNAP benefit is only enough to cover the cost of 1.3 meals per day in New York City.² At the same time, the cost of food in our City has grown by 27% on average and by 46% in Manhattan alone, since the Hunger Cliff, reducing the buying power for household food dollars.

In New York City, and across the country, when household resources cannot fully cover the cost of food, families visit the charitable network of food pantries and soup kitchens as a last resort. But this emergency food network cannot bear the brunt of these harmful proposed changes. Our emergency food network operates without excess: the majority of programs are run by

¹ [Unboxing the Reality of Hunger](#), Food Bank For New York City, February 2018.

² [Reflections of Hunger from the Front Lines](#), Food Bank For New York City, November 2018.

volunteers, with a median food budget of just \$12,123.³ Recent research shows that more than half of New York City's soup kitchens and food pantries (54%) report running out of food.⁴ If more families in our communities lose resources for groceries, healthcare, or housing due to these proposed changes to public charge, those families will seek assistance at these very community programs that are stretched too thin. Changes to the public charge would create unmanageable demand at nonprofit and faith-based organizations who are already struggling to serve communities in need.

In 35 years of service to low income New Yorkers, Food Bank has provided more than 1.2 billion meals to New Yorkers in need. Nearly one in five New York City residents relies on our programs and services. Our income support services, including SNAP enrollment and free tax assistance for the working poor, put more than \$115 million each year into the pockets of New Yorkers, helping them to afford food and achieve greater dignity and independence. In addition, Food Bank's nutrition education programs and services empower more than 50,000 children, teens and adults to sustain a healthy diet on a limited budget. As one of our country's most robust anti-hunger organizations, we are deeply troubled by this proposal which would prevent thousands of New Yorkers from accessing the food, healthcare, and housing they need to survive.

Our nation's charitable response to hunger is not, and cannot be a replacement for vital federal nutrition programs. If these rule changes become a reality, more New Yorkers will unnecessarily fall deeper into poverty and experience hunger. We strongly oppose this proposal, which undercuts both the legacy of human services in our country along with the anti-hunger community's ability to address food insecurity and poverty. These proposals seek to unnecessarily make it harder for immigrant families to access essential, survival resources, and we urge the federal government to **not** adopt these changes to the "Inadmissibility on Public Charge Grounds".

Thank you,

Margarette Purvis
President & CEO
Food Bank For New York City

³ [Unboxing the Reality of Hunger](#), Food Bank For New York City, February 2018.

⁴ [Reflections of Hunger from the Front Lines](#), Food Bank For New York City, November 2018.