Dear Chief Deshommes:

Health Access California, the statewide health care consumer advocacy coalition working for quality, affordable health care for all Californians, writes to strongly oppose the recently proposed rule redefining the term “public charge.” The proposed changes to public charge will cause irreparable harm to California’s immigrant families seeking access to health care, and weakens the trust between immigrant communities and federal and state entities administering health coverage. The **proposed rule will discourage lawfully present immigrant Californians from signing up for health coverage or seeking care, which threatens health coverage for tens of thousands** of eligible Californians and undermines public health. The proposed public charge rule also threatens to impact all Californians and Americans, weakening the health care system we all rely on, and undermining our economic growth as well.

Over 1 in 3 Californians are enrolled in Medi-Cal. Among the families that are enrolled in Medi-Cal, over half are families with children. The proposed rule expands the types of benefits that could be considered in a “public charge” determination to include Medicaid (Medi-Cal in California), with very limited exceptions. Under the proposed rule, a child’s receipt of Medi-Cal benefits could affect his or her ability to become a permanent resident or get a visa if their parents are not U.S. citizens. In California, many immigrant families will be discouraged from accessing Medi-Cal or other public resources they are entitled to, or dis-enroll from Medi-Cal or other public benefits, regardless of whether or not they are directly impacted by the public charge rule change.

**Decreased Medi-Cal Enrollment as a Result of Public Charge Will Increase Uninsured Rate, Lead to Poorer Health Outcomes**

The proposed rule will absolutely decrease Medi-Cal enrollment in California of those who are legally entitled to enroll in such coverage. Fear, confusion, and the actual consequences to individuals under such a rule change will lead to disenrollment of eligible individuals in

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2 UCLA Center for Health Policy Research. [www.healthpolicy.ucla.edu](http://www.healthpolicy.ucla.edu)
non-citizen families. According to the Kaiser Family Foundation, the proposed rule could lead to Medicaid
disenrollment rates ranging from 15% to 35% among Medicaid and CHIP enrollees living in a household
with a noncitizen, meaning between 2.1 to 4.9 million Medicaid/CHIP enrollees would dis-enroll
nationwide. Given California’s significant immigrant population, our state healthcare system would be
significantly undermined.

California already stands to lose health coverage gains made as a result of the Affordable Care Act because
of federal changes to health insurance laws, including the repeal of the ACA’s individual mandate penalty.
Without additional state action, the number of Californians who would be uninsured could increase to 4.4
million Californians by 2023. Combined with federal changes to public charge, this will result in more
Californians going uninsured.

Uninsured families have reduced access to care, which contributes to worse health outcomes, reduced
prescription drug access, and increased use of emergency care as a result of delayed treatment. It also leads
to increases in uncompensated care, resulting in adverse consequences for hospitals, clinics, and providers
who manage those costs, leading them to cut back on services and reducing access even for those already
insured. It also leads has implications on social determinants of health, with the uninsured having increased
rates of poverty and housing instability and reduced productivity and educational attainment.

Public Charge Threatens Health System, Financing of Medi-Cal Program In California

One in six of all California children have at least one undocumented parent. This rule change combined
with other shifting federal immigration policies are creating confusion and fear at the community level.
According to the Urban Institute, the public charge rule could result in the disenrollment of legally residing
children, preventing them from accessing the health care they need. This will surely lead to poorer health
outcomes and increasing health disparities by race, for more Californians.

In California, this “chilling effect” will not only have devastating consequences for all members of an
immigrant family, including children and seniors, regardless of whether some are citizens or not, but will
also threaten California’s health system as a whole. Over 2.1 million could potentially dis-enroll from Medi-
Cal, reducing federal funds that support the health plans and providers in the Medi-Cal program by up to
$1.2 billion dollars. Lower enrollment would mean less funding to support our Medi-Cal and health care
infrastructure, impacting care for all Californians.

Studies show that when there is a reduction in federal funding for state programs, an economic multiplier
effect results in major job losses in the state, and reductions in the income of workers in the healthcare
industry, leading to reduced state tax revenue, further affecting the economic growth of the state. In
California, an increase in the number of people without health insurance will also affect our state’s
economic growth, resulting in more jobs lost throughout the state. Federal dollars support both private

1 Kaiser Family Foundation: Estimated Impacts of the Proposed Public Charge Rule on Immigrants and Medicaid. https://www.kff.org/disparities-
2 California’s Health Coverage Gains Will Erode Without New Action by the State. http://newsroom.ucla.edu/releases/california-health-coverage-gains-
erode-without-state-action
changes-to-public-charge-policies-for-immigrants-implications-for-health-coverage/
4 What’s at Stake for the State. https://dornsife.usc.edu/assets/sites/731/docs/whats_at_stake_for_the_state.pdf
and public employment throughout the healthcare industry. Less federal funding could lead to lower wages, job loss, and a reduction of local healthcare related economic activity generally.

For these reasons, Health Access California strongly opposes the Department of Homeland Security’s proposed rule change to “public charge,” and any similar efforts to discourage immigrant families and Californians from accessing health care benefits they need. The public charge rule will discourage legally residing immigrant Californians from signing up for health coverage or seeking care, which threatens health coverage for hundreds of thousands of Californians and threatens harm to California’s public health.

Sincerely,

[Signature]

Anthony Wright
Executive Director