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Supporting the Resilience of America's Immigrant Communities:

How Community Organizations are Responding to Federal Policy Changes

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Executive Summary

For as long as immigrants have come to the United States, immigrant-serving and immigrant-led organizations have provided them direct support, advocated for their rights and needs, and connected them to public benefits for which they are eligible. These roles are especially important during moments of strain or challenge, such as those that occur as a result of changes to federal policies affecting immigrants and their families. Because nearly one in four households with children contain an immigrant parent, researchers have documented how recent and proposed changes related to Deferred Action for Childhood Arrivals (DACA), to refugee and asylum-seekers, persons with Temporary Protected Status (TPS), and detention and deportation practices impact millions of children¹ and adults.²

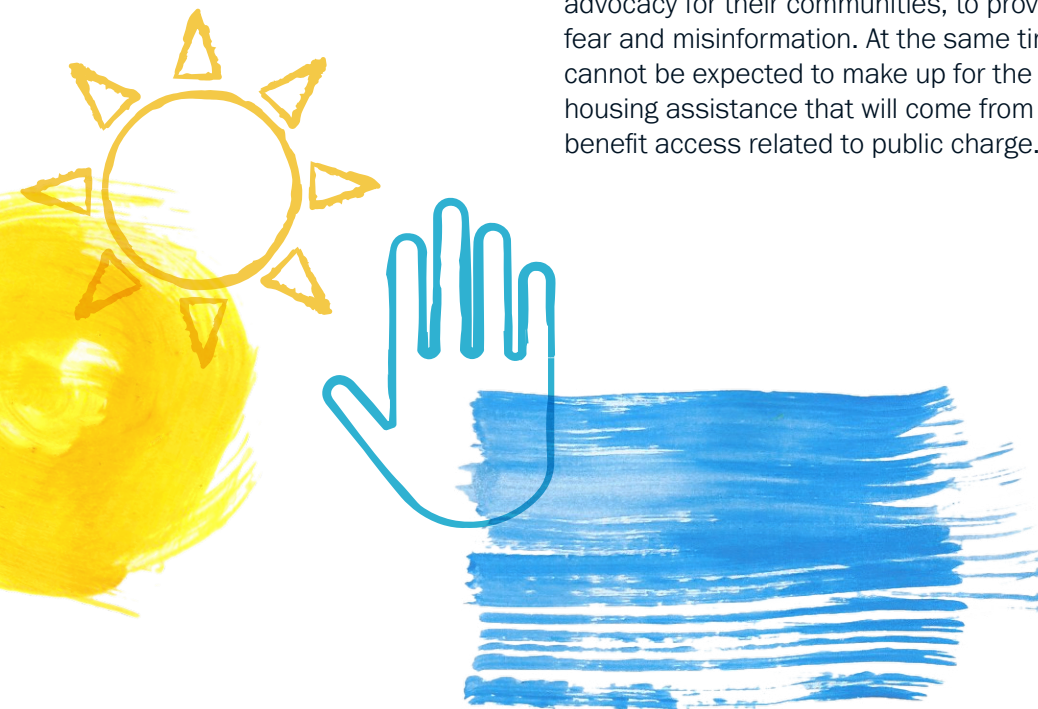
This research brief seeks to understand the impact of these policy changes not just on immigrants, their families, and the communities in which they live but upon the local institutions that support them. Based on interviews with practitioners in Chicago, Houston, Kansas City, Los Angeles, and New York who serve varied ethnic neighborhoods, the brief explores how organizations have responded so as to support the resilience of immigrant communities. The paper particularly focuses on policy implications related to proposed changes to “public charge” determinations. Public charge is a concept in immigration law which allows officials to examine whether an individual will become primarily dependent on governmental assistance. The interviews conducted for this research project found that recent changes in federal immigration policy have:

- **Negatively impacted immigrant communities.** Interviewees across the five cities studied described fear and confusion in immigrant communities, children forced to play adult roles, and declines in enrollment to public benefits to which groups are entitled. This had the reported effect of compounding any food and housing insecurity that communities were already experiencing.
- **Impacted the work of community organizations.** One critical role of immigrant-serving organizations is to connect families to the public benefits to which they are entitled, and to public institutions such as the judicial system. This work has become more challenging. While the described impact varied across interviews, practitioners described how many people were newly hesitant to obtain health or emergency food benefits, and to pursue their legal rights, because there was a fear that this might affect future attempts to become permanent residents or citizens, and/or result in deportation. Despite the reported drop-off in engagement with public benefits, however, organizations interviewed had steady or increased demand for their own services — and experienced increase costs — due to increased community needs.

- **Increased the role of community organizations.** Across the five cities studied, community organizations have conducted more extensive outreach to serve families who might be reluctant to come forth for help of all sorts. They have adapted existing services to share information about changing immigration policies, provided new direct support to community members as they interacted with immigration agencies, and engaged in new service or advocacy coalitions to respond to emerging community needs.
- **Factors that helped organizations respond to new community needs effectively.** No interviewee said that it was a difficult decision to respond to emerging needs in the communities they serve. At the same time, many recounted significant costs to adapting services or providing new ones. Strong relationships with residents, having resources to devote to the work, and access to strong service and advocacy networks both helped organizations start to engage with new needs in their communities and become effective in it.

Policy implications from these findings include:

- **Implications of the proposed public charge rule change.** Consistent with past research, LISC’s research finds that the proposed public charge rule change would harm the public health, safety, and economic mobility of immigrant communities. LISC’s research also suggests that community organizations may experience significant cost multipliers due to the proposed “public charge” rule change, as groups spend significant effort reaching newly-fearful populations for all kinds of services.
- **New resource needs.** Given the escalation of need in immigrant communities, groups and networks need additional resources so they can develop the necessary expertise to assist individuals and engage in advocacy for their communities, to provide accurate information to combat fear and misinformation. At the same time, community organizations cannot be expected to make up for the loss of Medicaid, SNAP, or federal housing assistance that will come from the direct and “chilling” effects on benefit access related to public charge.



1 in 4

households with children contain an immigrant parent.

Introduction

For as long as immigrants have come to the United States, immigrant-serving and immigrant-led organizations have provided them direct support, advocated for their rights and needs, and connected them to public benefits for which they are eligible. These roles are especially important during moments of strain or challenge, such as those that occur as a result of changes to federal policies affecting immigrants and their families. Because nearly one in four households with children contain an immigrant parent, researchers have documented how recent and proposed changes related to Deferred Action for Childhood Arrivals (DACA), to refugee and asylum-seekers, persons with Temporary Protected Status (TPS), and detention and deportation practices impact millions of children¹ and adults.²

This research³ brief seeks to understand the impact of these policy changes not just on immigrants, their families, and communities in which they live but upon the local institutions that support them. It analyzes and reviews:

- The impact of recent federal policy changes on immigrant neighborhoods and the community institutions
- The effect of these changes on community organizations, including their ability to connect immigrants to public benefits to which they are entitled
- Response strategies that community organizations have employed to connect their clients with benefits and services more effectively
- Policy implications, including with respect to recently proposed changes to the federal public charge regulations

Analyses draw on interviews with immigrant-led and immigrant-serving community organizations in Chicago, Houston, Kansas City, Missouri, Los Angeles, and New York.⁴ Consistent with past research, the report finds that recent and proposed policy changes have caused fear and uncertainty in immigrant communities, reduced access to critical public benefits to which families are legally entitled, and may be exacerbating housing and food insecurity as a result. This climate of fear and confusion has also made local groups' efforts at community-building and service provision more challenging, and has caused resource drains on local organizations to respond to new needs. Fortunately, community organizations report building on long-standing trust created with immigrant populations to expand outreach and community organizing, provide new services, and adapt their existing programs to better serve those in need.

Impacts of Changes in Federal Immigration Policy on Families and Communities



Two words come to mind: fear and confusion.

– Diane Rojas

Across the five cities studied, all interviewed organizations reported an increase in uncertainty and stress in immigrant communities as a result of recent proposed and enacted policy changes.⁵ For example, Guadalupe Centers in Kansas City, Missouri is an organization that since 1919 has supported Latino communities through education, job training, health and social services as well as cultural and social activities. Its Vice President of Health and Social Services, Diane Rojas, summarized the atmosphere in Kansas City by saying “Two words come to mind: fear and confusion.” In the case of Kansas City, Rojas described families’ anxiety being further fueled by accounts of individuals picked up for minor offenses such as a broken taillight and sent to detention centers hours from home: “There are areas you don’t want to even venture into because there’s a lot of profiling going on.”

Many practitioners also noted that families who have not been directly impacted by changed detention and deportation policies have still felt the need to prepare for worst-case scenarios. For example, the Southwest Organizing Project (SWOP) is a coalition of Christian, Muslim and Jewish faith institutions, local schools and other institutions in Southwest Chicago. One of its parent organizers, Mayra Sarabia, described how households that were in the process of naturalization had sometimes transferred legal guardianship of younger children to older citizen children or to relatives with more secure immigration status. As a result, practitioners in Chicago and elsewhere have described how children have found themselves forced into adult roles, such as earning money for the family or otherwise taking on adult responsibilities.

Interviewees across the five cities studied described fear and confusion in immigrant communities, children forced to play adult roles, and challenges in enrolling households to public benefits to which families are entitled.

In terms of confusion, interviewees across the five cities described an atmosphere in which rapidly-changing and conflicting information from the Administration has made families uncertain about their future. These changing and conflicting accounts have also contributed to an environment in which rumors about rule changes can cause panic and alarm within communities. For example, Make the Road New York (MRNY) is an organization which supports immigrant communities through legal services, education programs, community organizing, and policy innovation. Angel Vera, an employee of MRNY, described how landlords now sometimes threaten to call ICE in order to intimidate tenants, and the state of alarm that can spread quickly as a result.

In addition to this emotional toll, in certain places, practitioners described how fewer members of immigrant communities were accessing public benefits to which they are legally entitled. While the drop-off varied from place to place, with practitioners in places like New York reporting fewer overall, recent fears about potential changes to “public charge” determinations have been driving these declines. Public charge is a concept in immigration law which allows officials to examine whether an individual will become primarily dependent on governmental assistance. For many months during 2018, there were media reports that the Department of Homeland Security was revising the public charge rule to include a far greater number of public benefit programs under the public charge test. While the rule was released on October 10th, in some cases mere rumors of potential changes were reported to have caused a chilling effect, leading some immigrants to withdraw from public assistance programs in advance of any final regulation.

Impact on the work of community organizations

One critical role of immigrant-serving organizations is to connect families to the public benefits to which they are entitled, and to public institutions such as the judicial system. When immigrants are apprehensive to utilize public services, it makes the work of community organizations both harder and more necessary.

Across interviews, practitioners described how many people were newly hesitant to obtain health or emergency food benefits and, separately, to pursue their legal rights, because there was a fear that this might affect future attempts to become permanent residents or citizens, and/or result in deportation.

For example, Make the Road New York provides assistance to households with limited English proficiency to access healthcare, helping enroll families into health insurance and negotiate hospital bills. One worker described an instance of lawful permanent resident who felt afraid to enroll their citizen children into health care programs, because they were concerned that this choice would make it impossible for the family to remain united in this country in the longer-term — even though no current proposed rule about children’s access to health care would in fact have this effect.⁶ S/he explained:

There’s a lot of fear because that’s the ultimate goal, to become a citizen, so there’s a lot of individuals who have their green card and will consider not enrolling in health insurance or other benefits. Even though that isn’t considered as part of [current proposed rule changes, as those already with a green card would not be affected].

This cautiousness on the part of families even extended to emergency benefits that could keep them from becoming homeless, complicating the work of organizations who seek to assist them.



We have *promotoras* that are members of the community and can connect because they've experienced similar barriers, both personal and professionally.



Since there's a lot of fear...[they'll say] I'm not going to go to court.

– Carmen Garcia

Ezra Kautz, a housing attorney at Make the Road New York, said that some people had forgone eviction-prevention funds because they feared the future potential repercussions of doing so:

There's more people who are resisting seeking assistance.... It's the certainty that you and your family will be evicted now, versus the possibility that someday in the future there might be some kind of avenue that's foreclosed.

Similarly, Carmen Garcia is a Community Health Worker with MRNY who helps tenants change conditions in their apartments so they experience fewer asthma-related problems. While many changes, such as using special trash bags, are within the tenant's control, others are the landlord's responsibility – for example, repairing wet, mildewed ceilings, peeling paint or decaying plaster. Garcia reported that families will make changes within their control, but had become hesitant to pursue legal remedies to ensure the landlord met their responsibilities: “Since there's a lot of fear...[they'll say] I'm not going to go to court.”

In other cases, a fear of encountering the federal government has deterred families from seeking emergency assistance, even in the event of a disaster. For example, Wesley Community Center in Houston provides services from early childhood education through workforce services for adults to senior services. It also provides help to victims of Hurricane Harvey. Erica Luna, a case manager with the disaster relief program, described how many immigrant households have been fearful to access recovery aid after Hurricane Harvey in the fall of 2017 – often living in horrific conditions as a result, even though any household with a US citizen or green card holder is eligible for FEMA assistance.

As an example, one area containing mobile homes was particularly hard hit by the storm, but did not have individuals who reached out for assistance until months later. (Even after reaching out to FEMA, many were unable to receive it until getting help through Wesley, as described in the text box below.) In other Houston neighborhoods, some landlords claimed FEMA benefits for unit damage without making repairs, thereby making tenants themselves ineligible for relief. According to Luna, this was more likely to occur when the landlord suspected that a mixed-status family might be fearful to press for their rights.

Despite the reported drop-off in engagement with public benefits, no organizations described a similar decline in engagement with their own services or programs. Instead, they described increased strains to respond to new needs.

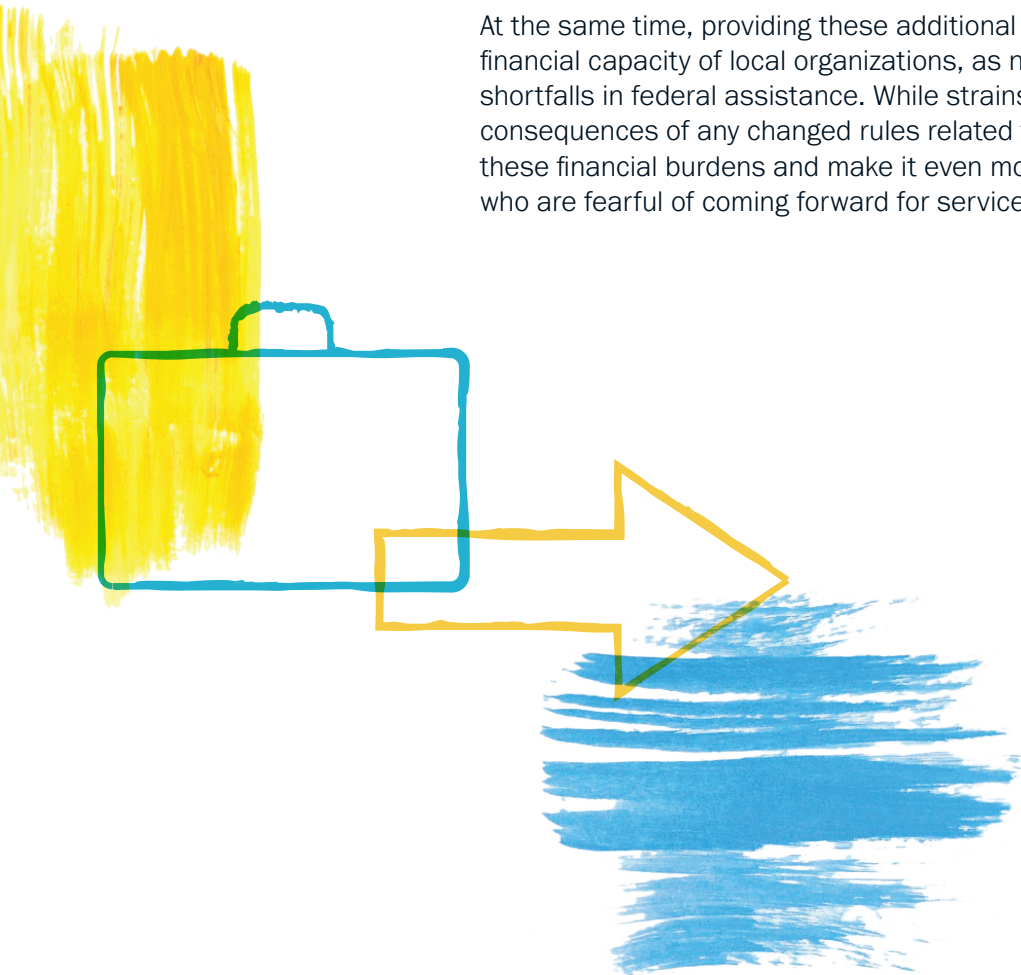
Despite the reported drop-off in engagement with public benefits in some places⁷, no organizations described a similar decline in engagement with their own services or programs. In contrast, many described an increase in service participation due to longstanding trust with the community – a trust that overcame what was described sometimes as a fearfulness of neighbors to come together in public spaces to advocate for their rights. For example, the Chinese

Community Center of Houston (CCC) is a comprehensive social service community center, which provides childcare, after school, summer camp, language, job training, senior programs, leadership and health activities. Chi-Mei Lin, CCC's executive director, spoke about how being a trusted presence in the Chinese community of Houston — and having a physical space where families tended to gather — made it easier to connect with individuals in times of crisis:

That relationship, we build up over time...They trust you because you actually have a relationship with them through other kinds of services. If you want to reassure and rebuild the trust in the minority or immigrant populations, we need to be foot soldiers. There's no fancy way of doing it...connect with your clients, connect with your families, you don't want to reach out to them when [they're experiencing] a crisis. Be there in a non-crisis time.

Use of community-based services may have remained constant or increased because programs had long waiting lists, were at or above capacity, or had eligibility requirements that made changes in immigration policy less directly impactful to those served. But practitioners in Houston and Kansas City described other organizations in their cities where immigrant families were less likely to appear, because these groups signaled an unwillingness to work with undocumented or mixed-status families. This further suggests that trust and openness that has been earned over time is important for sustaining engagement with communities at this moment.

At the same time, providing these additional services may broadly strain the financial capacity of local organizations, as no group is able to make up for shortfalls in federal assistance. While strains are currently intense, future consequences of any changed rules related to public charge might exacerbate these financial burdens and make it even more difficult to engage immigrants who are fearful of coming forward for services of any sort.



Responses to Federal Immigration Policy Changes by Community Organizations

Across the five cities studied, community organizations have conducted more extensive outreach to serve families who might otherwise have been newly reluctant to come forth for help of any sort. They have adapted existing services to include sharing information about changing immigration policies, provided new direct support to community members as they interacted with immigration agencies, and engaged in new service or advocacy coalitions to respond to emerging community needs based on changes in immigration policy.

To overcome fear and mistrust, many organizations have changed how they reach out to families. For example, Erica Luna of Wesley Community Center in Houston has collaborated with churches so as to connect households to FEMA assistance, in some cases conducting intake in houses of worship themselves, where she indicated people feel “safe in a time of so much uncertainty.” In other cases, organizations provided information about policy changes to households who used their regular services, such as food pantries or childcare, using these programs as a platform to refer out to legal service providers. Since people already felt comfortable interacting with staff at these programs, adding a forum or know-your-rights training was seen by many interviewees to be an effective outreach tool for those who needed to be informed.

Across the five cities studied, community organizations have conducted more extensive outreach to serve families who might be newly reluctant to come forth for help of any sort. They have adapted existing services to share information about changing immigration policies, provided new direct support to community members as they interacted with immigration agencies, and engaged in new service or advocacy coalitions to respond to emerging community needs.

For example, Mattie Rhodes is a 123-year old community development agency in Kansas City, Missouri that provides behavior health services, youth development, community engagement, and cultural programs to the Greater Kansas City region. Its President and CEO, John Fierro, described a forum it sponsored with four bilingual immigration attorneys that ran over because of demand, where “most people stayed behind for at least 30-45 minutes longer, asking follow-up questions.” In other cases, organizations added existing protections for residents of their affordable housing properties, as in the case of the Little Tokyo Service Center (LTSC) of Los Angeles. LTSC provides social services and conducts community development activities, while supporting cultural preservation in Little Tokyo and among the broader Japanese community in the Greater Los Angeles Area. Its deputy director, Erich Nakano, described how LTSC not only conducted

“know your rights” training for residents of its affordable housing developments and childcare programs, but also consulted with attorneys and other nonprofit housing providers to enact policies to ensure that building managers are trained and aware of resident rights in the case of an ICE visit.

Some organizations have developed entirely new immigration support services for residents in the wake of federal changes. Christina Jasso, a coordinator for family support cases with Guadalupe Centers in Kansas City, now spends much of her time on immigration cases. Whereas previously her position focused on broad emergency assistance to clients to resolve family crises, prevent homelessness, and improve their economic and housing security, she has expanded her role as an “accredited representative”⁸ around assisting with various immigration applications as overseen by a local immigration attorney.

Other organizations have formed new service or advocacy partnerships to respond to policy changes. Many groups reported that they used locally-formed networks to stay up to date with new policies and their implications for immigration cases and their own service delivery. For example, Los Angeles’s Public Counsel is the largest pro bono law firm in the nation, which works with major firms and corporations to provide services for individuals and organizations in areas as varied as veterans’ rights, education, homelessness prevention and immigration. Uyen Nune, a former staff attorney who worked to support community development organizations, explained the benefits of participating in an information-sharing network supported by a local foundation:

It’s been an incredibly helpful space because it’s leveraging a lot of resources, and understanding who is doing what in the community and not duplicating efforts. It also [helps] us get on the same page with our messaging so that when we are speaking to the community it’s a consistent message.

Finally, though many groups had not previously seen themselves as advocates in the area of immigration policy, several organizations reported that they feel compelled to engage with public policy to support their communities. For example, Fierro highlighted how Mattie Rhodes formed a group of staff who shared their street-level experiences and developed advocacy priorities on that basis:

It was an opportunity for people to come in and say ‘here’s what I’m hearing, this is what I saw.’ Then that guided our efforts in any community advocacy.... we knew we had to be more involved from an advocacy standpoint.

These outreach, service delivery and advocacy efforts have resulted in a number of important accomplishments, as described on the next page.

Successes in Promoting Resilience in Immigrant Communities

Community-based organizations studied have achieved a number of successes in rebuilding trust with wary communities, adapting service delivery, and promoting policy changes to support immigrant neighborhoods.

- 1. Reaching deeper into affected neighborhoods.** Wesley Community Center in Houston was able to help undocumented families who had their homes completely destroyed by Hurricane Harvey by meeting them in their local church where they felt safe. As Erica Luna described: “When they saw us there in their community on their ground, it helped to open that door and establish that trust...Then we were able to connect them with partners that were able to help them rebuild their trailers.”
- 2. Providing safety-net services.** Avenue CDC in Houston has been able to provide safety net housing for families with mixed immigration statuses by using a property bought during the foreclosure crisis.
- 3. Providing protections to affordable housing residents.** The Little Tokyo Service Center in Los Angeles was able to establish new policies and put procedures in place for tenants to exercise their rights in the event of a visit from ICE.
- 4. Helping tenants fight back against harassment.** Tenants were galvanized by a landlord who threatened to call ICE on his tenants, and successfully organized with Make the Road New York to promote positive changes in the building to ensure their rights.
- 5. Advocacy and organizing.** In some places, the political environment at the federal level may create momentum for supporters to pass legislation that benefits immigrant communities in general ways. In Los Angeles, for example, pro-immigrant groups seized the opportunity to push for the legalization of street vending, ensuring that a bill that had not left committee for three years finally passed. According to Rudy Espinoza, the Executive Director of Leadership for Urban Renewal (LURN) in Los Angeles, “People [in Los Angeles] are afraid of being seen as anti-immigrant right now.”

Factors that Help Community Organizations Respond Effectively

While this study does not formally assess the effectiveness of strategies to support immigrant communities, practitioners described the costs and risks in responding to new community needs, the factors that promoted their engagement at this moment, and the conditions that allowed them to become successful: deep community engagement, sufficient organizational resources, trusted community partners, and a supportive policy environment.

No interviewee said that it was a difficult decision to respond to emerging needs around immigration policy in the communities they serve. At the same time, many recounted significant costs and risks to adapting services or providing new ones. In terms of costs, groups devoted extensive time and resources to provide new services, keep current with policy changes, and to engage in multiple advocacy coalitions or referral networks. In the case of Guadalupe Centers in Kansas City, for example, a senior case worker participated in specialized training and dedicated significantly more time to assist with immigration related issues. (Even among groups that did not assign new full-time staff members, responding to changes added strain to organizations, as described throughout.)

In terms of risks, Diane Rojas of Guadalupe Centers spoke about the importance of accessing a quality legal service network for any client referrals:

Make sure that you're going to reputable groups in terms of where you're getting your information. This is essential for families who can find themselves in very bad positions if they get the wrong information....if you don't know, don't pretend to know because you could do so much damage to these families.

Trust with community members is critical not just for immigration-related services but for all services a group provided. As a result, an organization's reputation with the community could be harmed if new services are not delivered effectively.

No interviewee said that it was a difficult decision to respond to emerging needs in the communities they serve. At the same time, many recounted significant costs and reputational risks to adapting services or providing new ones.

Given the risks and costs involved, several factors appeared to help organizations make the choice to support their communities at this moment. Unsurprisingly, strong relationships with residents was one of these factors. As some interviewees reflected, the normal dynamics of providing childcare services or developing affordable housing might not be directly impacted by changed policies around immigration, as the mechanics of program administration do not require a group to address parent or tenant needs in this regard. However, if relationships with service participants extended beyond the dynamics of any individual service

or development program, a group was more likely to attempt to provide help around immigration issues. For example, Avenue CDC in Houston builds affordable rental housing, helps homeowners, provides disaster relief, supports community-based arts and culture, and conducts comprehensive community revitalization within three neighborhoods. Its deputy director, Jenifer Wagley, reflected, “If you just do LIHTC [build housing through the Low Income Housing Tax Credit], you don’t have to worry about this, but when you start going into the neighborhoods you do. You have to hold yourself to the line to do community engagement.” In other words, community development activity that is narrowly focused on bricks and mortar may not recognize a neighborhood’s new needs, but community development that is more responsive to varied and emerging resident concerns will be more likely to do so.

An organization’s history of community responsiveness can pave the way for engagement at the current moment. For example, the Southwest Organizing Project (SWOP) in Chicago, described above, is a membership organization which includes local churches, synagogues, and mosques. During the foreclosure crisis of the early-mid 2000s, Southwest Chicago was particularly hard-hit, but many parishioners and congregants were afraid or ashamed to come forward for help. As a result, religious institutions themselves had to be willing to introduce this difficult subject with their lay leadership or within religious services, as a first step in connecting them to effective help. These religious groups who were part of SWOP became critical outreach vehicles for local foreclosure prevention efforts. In the same way, SWOP’s engagement with immigration issues stemmed from this desire to be responsive to emerging needs. As Father Pizzo, former pastor of St. Rita’s church, summarized, “The heart of any organization is about relationships. That’s where the Catholic Parish is able to identify with community organizing.” In this way, being truly place- and community-based, made organizations more likely to be engaged, as described in the text box below.

Another factor that helped community groups engage was confidence in their service or development partnerships and collaborations with other community organizations. Within an established and trusting network, groups felt better able to share information on sensitive topics which helped them “go beyond their comfort zone” of their traditional areas of service delivery, to respond to other kinds of community needs.



How does being community-based support engagement with immigrant populations?

By providing a range of much needed services on a regular basis, from childcare to food assistance, community-based organizations have constant and meaningful interaction with immigrant families. As Carla Perez of Wesley Community Center in Houston noted: “We have up to one hundred clients that come here daily. We have relationships with these people.” This constant engagement helps build trust and support in difficult times.

In other times, being community-based also means that many of the staff in these organizations are community members themselves. This creates opportunities for people to share experiences, and allows organizations to connect to populations who might not otherwise come forward and have greater reach to impacted families and individuals. As Mayra Sarabia, member of the Southwest Organizing Project in Chicago noted: “It’s both knowing that we’re behind an organization that has been in a community for a long time but they also see me as a neighbor and someone that I trust and that might be experiencing the same problems as me whatever might be the case.”

Finally, being place-based also gives organizations a deeper understanding of local needs, and the best way to reach and serve the community. As Arline Cruz of Make the Road New York explained, “We have **promotoras** from the community that are members of the community and can connect because they’ve experienced similar barriers, both personal and professionally.”



No one shows up for school or doctor's appointments, anything that had to do with the real world, until the threat goes from a red to a yellow.

– Anne Whitlock

For example, Connect Community in Houston adopts the Purpose-Built Communities Model, a holistic approach to promoting health, cradle-to-career services, and mixed-income housing. Its executive director, Anne Whitlock, described how elevated levels of fear struck schools and other kinds of community institutions in their partnership, including both churches and local mosques: at moments of elevated anxiety, “No one shows up for school or doctor’s appointments, anything that had to do with the real world, until the threat goes from a red to a yellow.” Working with local charter schools and other community groups, Connect Community has helped promote information about rights and developed policies so that schools and other places can feel safe to children and adults concerned about enforcement actions. Connect Community has also connected individuals to legal services networks if they need immigration-related assistance. This new kind of work built off relationships where schools and other service providers had started to collaborate in a way that let them go beyond the scope of what each group might typically provide. Whitlock explained:

We’ve worked very intentionally over the past few years to build that relationship and build that level trust. And we have a network of providers that are willing to share information and have each others’ backs on topics that are very sensitive...You have to have that collaborative spirit, by pushing into each others’ work, to be able to take off your own organizational hat to try to decide what is in the best interest of the community.

In this way, their work creating referrals to legal service networks was an extension of this silo-busting responsiveness, because they felt more comfortable working together.

The same factors that helped practitioners engage with immigration-related needs in the first place, also helped promote their successes: deep community engagement, sufficient organizational resources, trusted community partners, and a supportive policy environment.

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Around resident engagement, several community groups employed or engaged residents to share their experiences with others. For example, Make the Road New York’s **promotora** program trains community members to work as peer counselors, to help families sign up for food stamps and other public benefits, and to conduct health education. As Arline Cruz explained about the program’s effectiveness:

The unique thing about the **promotoras** is that they have likely gone through some sort of status change in their lifetime. So, while they are out there trying to do outreach and to engage folks they really can [share] their own experience of adjusting their own status.... they are from the community, they look like the people from the community, they speak the language or the dialect, and they are able to connect to the people from the community.

Strong resident relationships also helped groups like SWOP in Chicago build trust around immigration needs. Its organizing in schools has created opportunities for parents to know each other and trust each other enough to speak about their needs, to become involved in advocacy and organizing related to immigration policy, and to accompany others to immigration hearings.

Across different interviews, having sufficient resources was critical, both for individual agencies and across the broader network of community organizations. Practitioners reflected that a group's ability to designate staff people to provide direct immigration assistance or coordinate with other providers and advocates was very important to meet escalating needs — as Diana Rojas of Kansas City's Guadalupe Center joked, “We wish we could just clone” Jasso, the staff person certified to represent immigrants before courts and public agencies. In the case of Wesley Community Center, the ability to activate a food pantry within 48 hours of Hurricane Harvey helped establish connections to immigrants that the organization leveraged later to provide support. For Make the Road New York, a large organization, immigration attorneys could advise other legal and service departments during federal policy updates scheduled at the beginning of each week.

Where individual organizations could not redirect staff exclusively to provide immigration-related services, the resources of a broader service network were important to successful practice. The efforts of L.A.'s Little Tokyo Service Center to develop policies and trainings about tenants' rights in the event of ICE raids were helped by a broader California network of nonprofit housing providers, and the support of Public Counsel. SWOP in Chicago's referrals to immigration-related services are helped by a strong network of pro-bono attorneys, and Wesley Community Center's outreach was helped by its network of local churches.

Finally, the fact that the study encompassed five cities across different states and regions makes it possible to start to explore how different local policy and institutional contexts can help or hinder the work of connecting with immigrant communities. This research suggests that policy decisions by state and local government appeared to be a factor in helping or harming community groups' engagement with immigrant communities. For example, in the Kansas City area, as described above, immigrants feared racial profiling by police that could result in being pulled over and sent to a detention center, as described above, and this exacerbated the atmosphere of fear and mistrust that local groups needed to overcome as they provided services.⁹ In contrast, when state and local policymakers actively support providing public benefits, it can help a local organization connect to communities around these needed services as well as around other kinds of needs. As described by Arline Cruz of Make the Road New York around the work she does connecting immigrant families to Medicaid and other health services:

I feel lucky to live and work in New York because New York City does look out for its constituents, as these changes continue to happen. As an organization, we will continue to make sure that our community is one that continues to prosper and push for improvements.

Policy Implications

Clearly, the impact of changes on immigrant households and communities is the policy question of primary importance. But the findings above also have policy implications for actions by local, state, federal government and the philanthropic sector that can help or harm the efforts of organizations that support the resilience of immigrant neighborhoods. In particular, findings above suggest new and additional resource needs for individual or networks of organizations to develop expertise to assist individuals and engage in pro-immigrant advocacy. As described above, constantly-shifting rules require up-to-the-moment expertise or organizations risk providing families inaccurate information. It also takes staff time and organizational resources to participate in advocacy coalitions, to adapt existing services, and to create new outreach strategies to connect with households who are fearful of receiving assistance or accessing the justice system. An implication is that immigrant-serving organizations who have the trust and connections with their communities are well situated to navigate this landscape with their clients, but need additional support to do so effectively.

Because fears about public charge make individuals hesitant to obtain the benefits to which they are entitled, the proposed rule change has the threat of making people afraid of receiving all forms of assistance from government and community groups.

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households could be effectively dissuaded from accessing the benefits to which they are eligible, including most forms of Medicaid, federal housing assistance, and SNAP.

These findings also relate to proposed changes in federal public charge determinations. As described above, a rule proposed on October 10th, 2018 would broaden the “public charge” test by allowing immigration officials to consider a wider range of programs when making a decision about whether someone may enter the country or apply for a green card. Researchers have estimated that approximately 26 million households could be effectively dissuaded from accessing the benefits to which they are eligible, including most forms of Medicaid, federal housing assistance, and SNAP.¹⁰ Indeed, as these interviews reflect, families have already needed to make extraordinarily painful choices in anticipation of the rule change, because they are afraid that at some point accessing benefits might keep them from reuniting or staying together.

This phenomenon of reduced access is called the “chilling effect” of the rule, and has both a direct impact on households and an indirect economic impact on immigrant communities. One study estimated that immigrant communities across the country could lose as much as \$33.8 billion in economic activity, as forgoing SNAP and health insurance causes families to cut back in spending, and as groceries and other local businesses feel the effects of these decisions.¹¹ In addition to the economic impacts to businesses, deferred use of health insurance and food assistance by families in need may lead to a health crisis in these communities, with a rise in hospitalizations and increased need of governmental spending to remediate these conditions.

\$33.8 bn

in economic activity, as forgoing SNAP and health insurance causes families to cut back in spending, and as groceries and other local businesses feel the effects of these decisions.

LISC's research suggests that community organizations also may experience significant cost multipliers due to the proposed public charge rule. Indeed, because fears about public charge make individuals hesitant to obtain the benefits to which they are entitled, the rule has the threat of driving many immigrants "into the shadows" related to all kinds of services. The current proposed notice estimates a cost impact only of eight to ten hours of time per assisting individual so that they can familiarize themselves with its terms. This research suggests that this estimate excludes many direct and indirect costs, as groups need not only to learn about the new rule, but spend significant effort reaching newly-fearful populations — indeed, to work harder in general, as they have already done, to ensure that immigrants come forward to access community support and public services, including those not subject to the rule. As a result, the impact of the proposed public charge rule could extend to the ties between immigrant-supporting organizations and the broader neighborhoods that they serve, causing additional ripples of harm.

Endnotes

¹ Matthews, Ullrich and Cervantes 2018; Trisis and Herrera 2018.

² Fiscal Policy Institute 2018; Manatt 2018.

³ LISC Research and Evaluation is a national program of the Local Initiatives Support Corporation (LISC). With residents and partners, LISC's mission is to forge resilient and inclusive communities of opportunity across America — great places to live, work, visit, do business and raise families. LISC receives funding from banks, corporations, foundations and government agencies, and in turn uses that funding to provide financing (loans, grants and equity) and technical and management assistance to local partners and developers. Through our 35 local offices, a rural program that reaches nearly 1,400 counties in 44 states, and LISC-founded affiliates and entities, we work with a network of community-based partners to make investments in housing, businesses, jobs, education, safety and health. For more information, visit www.lisc.org/policy-research/research.

⁴ The neighborhoods that LISC has traditionally supported have about 150% more immigrants than the US metro average. Local LISC offices nominated organizations who worked with immigrant populations, who were interviewed and recorded according to semi-structured protocols. Interviews were coded and analyzed, and themes validated by discussion with research participants. While interviews were conducted with groups working in urban areas, it is worth noting that LISC also supports immigrant-serving organizations in rural communities, where needs, according to news accounts, have also been particularly challenging. See for example <https://www.mychamplainvalley.com/news/local-news/advocates-for-vermont-migrant-workers-sue-federal-state-authorities/1598460252>.

⁵ Specific changes have varied impacts on different kinds of immigrant populations. The research did not find and does not assume identical impacts on all communities in all parts of the country, but rather attempts to generalize impacts and responses across studied cities.

⁶ This is not meant to suggest that the fear was unfounded in reality — in the proposed rule that was in the end circulated for comment, DHS noted that they were considering including the Children's Health Insurance Program (CHIP) and explicitly asked for feedback as to this question.

⁷ Despite misgivings by many, Make the Road New York reported no decline in health care enrollment overall.

⁸ A person working at religious, charitable, or social service organizations who has been approved by the Board of Immigration Appeals (BIA) to represent individuals before Immigration Courts, the BIA and United States Customs and Immigration Services.

⁹ Even smaller-scale choices by individual public agencies could help or harm engagement with immigrant communities. For example, in Chicago, some principals, but not all, require fingerprinting in order for parents to volunteer in the classroom, with the result being that these schools have more challenges around parental engagement.

¹⁰ Manatt 2018.

¹¹ Fiscal Policy Institute 2018.



Forgoing Food Assistance out of Fear: Simulating the Child Poverty Impact of a Making SNAP a Legal Liability for Immigrants

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Abstract

Public charge, a term used by immigration officials for over 100 years, refers to a person who relies on public assistance at the government's expense. Immigrants who are deemed at high risk of becoming a public charge can be denied green cards; those outside of the United States can be denied entry. Current public charge policy largely applies to cash benefits. The Department of Homeland Security has proposed a regulation that will allow officials to consider the take-up of both cash and non-cash benefits when making public charge determinations. Nearly 90 percent of children with immigrant parents are U.S.-born and therefore eligible for public benefits. Most of these children live in mixed-status households. We examine the potential child poverty impact of the proposed regulation. Our results show that depending on the chilling effect, more than 2 million citizen children could lose access to the Supplemental Nutrition Assistance Program as a result of the proposed regulation.

Keywords

poverty, immigration, inequality

Introduction

In recent years, child poverty in the United States has been on the decline. The percentage of children living in poverty (according to the Supplemental Poverty Measure) reached a record low of 15.2 percent in 2016. Since the late 1960s, the child poverty rate has been reduced by nearly half. A large share of this progress can be attributed to the creation and expansion of the federal food assistance program (now the Supplemental Nutrition Assistance Program [SNAP], previously known as the Food Stamp Program). As a result of the nationwide implementation of the Food Stamp Program in the early 1970s and its increased effectiveness over time in reaching more of the eligible population, millions of children have been lifted out of poverty (Shapiro and Trisi 2017; Tiehen, Jolliffe, and Gundersen 2012).

A proposed regulation from the Department of Homeland Security (DHS), if implemented, could potentially reverse the downward trend in child poverty. The proposal (available at https://www.regulations.gov/document?D=DHS_FRDOC_0001-1706) addresses what DHS refers to as a *public charge*, a term used by U.S. immigration officials for more

than 100 years. Under current law, a public charge is a person who relies on or is likely to rely on public cash assistance or government support, including programs such as Supplemental Security Income (SSI) and Temporary Assistance for Needy Families (TANF). Foreign-born individuals who are deemed by immigration officials to have a high likelihood of becoming a public charge can be denied entry into the United States. Noncitizens within the United States who are considered to be a public charge can be denied lawful permanent residence (i.e., green cards).

The proposed regulation from the DHS will allow immigration officials to consider the take-up risk of cash and non-cash public benefits when making public charge determinations. Non-cash benefits in the DHS proposal

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include SNAP, nonemergency Medicaid, premium and cost sharing subsidies for Medicare Part D, as well as subsidized public housing programs.

In this analysis, we simulate potential attrition from the SNAP program under the assumption that the DHS public charge proposal becomes a DHS regulation. After simulating attrition from SNAP, we calculate the change in the child poverty rate. Prior research from the U.S. Department of Agriculture (USDA) suggests that a large number of children will be affected. Of the nearly 20 million children receiving SNAP, one in five are citizen children living with a noncitizen adult (Lauffer 2017). Drawing from prior research about the disenrollment of immigrant families from SNAP following changes in eligibility and immigration enforcement, we present results across a range of plausible chilling effects.

The objective of this study is to identify the child poverty outcomes that could arise if DHS expands the public charge regulation to include SNAP. In addition to being timely and relevant, there are two ways in which this study improves on methods typically used by policy and sociology researchers. First, unlike most studies of immigrant participation in food assistance programs, we take into account SNAP underreporting. Most studies of SNAP participation use either the Current Population Survey (CPS) or the American Community Survey (ACS).¹ Studies comparing SNAP reporting in the CPS to SNAP administrative records have found that 40 percent to 50 percent of SNAP recipients in the CPS do not report SNAP (Fox et al. 2017; Meyer and Mittag 2015). Fox et al. (2017) find that in the CPS, 40 percent of native-born recipients and 51 percent of foreign-born recipients do not report receiving SNAP.

Second, unlike most sociological studies of poverty in the sociology literature, we use the Supplemental Poverty Measure (SPM) rather than the Official Poverty Measure (OPM). The SPM is superior to the OPM in that the SPM is adjusted for cost of living differences between metro areas, and the SPM includes government transfers and taxes in the calculation of household resources.

Background

Immigrant Eligibility and Participation in the SNAP Program

The Supplemental Nutrition Assistance Program is one of the largest federal safety net programs in the country. SNAP provides nutrition assistance to participants, most of whom are children, the elderly, or people with disabilities. In fiscal year 2017, SNAP households received an average of \$254 a month; SNAP recipients received an average of \$126 a month—about \$1.40 per meal (Center on Budget and Policy Priorities 2018). To qualify for SNAP, households generally have to have an

annual income below 130 percent of the Federal Poverty Line (FPL).² For low-income households, access to SNAP can lead to long-term improvements in health and economic outcomes, especially for those who receive SNAP as children (Hoynes, Schanzenbach, and Almond 2016).

Unauthorized immigrants are ineligible for most public benefits, including SNAP. Legal immigrants are eligible for SNAP if they have lived in the United States for five years, receive disability-related assistance, or are children under 18. SNAP applications routinely ask for names and Social Security numbers of all persons in the household applying for benefits; some states also ask for date of entry, country of origin, alien registration number, and citizenship status of each person in the household (Alsan and Yang 2018). Using this information, states verify the immigration status of each household member. According to 2016 USDA data, approximately 9 percent of SNAP recipients are foreign-born (Lauffer 2017). Of that group, nearly half are naturalized citizens. Three percent of SNAP recipients are other noncitizens (lawful permanent residents or other eligible noncitizens). Nearly 1 in 10 SNAP recipients are citizen children living with noncitizen adults, about 4 million children in total. Among SNAP-eligible households, participation rates are slightly lower for those households with noncitizens compared to those with only citizens (Koball et al. 2013).

Prior Research on the Chilling Effects of Anti-immigrant Policies on Food Stamp Take-up

Under current public charge regulations and enforcement practices, immigrants can be denied permanent residence or entry to the country based on their likelihood of receiving cash assistance or long-term care at the government's expense. Recent surveys show that a large share of immigrants believe that receiving any kind of public benefit could affect their immigration status. According to the 2017 UCLA Luskin Quality of Life Index Survey, more than a third of residents in Los Angeles County report being concerned that they, a friend, or family member could be deported (Alsan and Yang 2018). Of those with such a concern, 80 percent report that they, a friend, or family member would be at greater risk of being deported by enrolling in a government health, education, or housing program.

This fear is not new, but there is evidence to suggest that it has become especially salient since the election of Donald Trump—a candidate and a president known for his

¹For example, see Bitler and Hoynes (2013); Kaushal, Waldfogel, and Wight (2014); and Skinner (2012).

²For most households, Supplemental Nutrition Assistance Program (SNAP) eligibility is determined by three tests: a gross income test (must be less than 130 percent of the federal poverty line), a net income test (income minus deductions must be less than 100 percent of the poverty line), and an asset test (assets must be less than \$2,250, excluding home and retirement accounts). For some households, broad-based categorical eligibility has effectively raised the gross income limit above 130 percent of the FPL.

anti-immigrant agenda—and the subsequent increase in immigrant arrest rates.³ In the months following the 2016 election, SNAP agencies in regions with high immigrant populations reported a spike in canceled appointments and urgent requests for disenrollment (Baumgaertner 2018). According to anecdotal reports following the leak of the public charge executive order to the *Washington Post* in the spring of 2018, a number of immigration attorneys have started to advise their clients to give up their SNAP benefit regardless of the client's plans to seek change of status (Vimo 2018).

The proposed public charge regulation explicitly targets noncitizens seeking a change of status and those applying for admission to the United States. The effects of the proposal, however, can operate through anyone with a noncitizen in their household or family. There are at least two reasons SNAP recipients not directly targeted by the proposal might have an incentive to cancel their benefit. First, SNAP recipients who plan to seek a change of status at some point in the future will need to cancel their benefit to demonstrate what the DHS refers to as “self-sufficiency.” According to the proposed regulation, immigration officials making public charge determinations will negatively weight the receipt of SNAP benefits at any point during the 36 months prior to the date of application. Second, if the public charge proposal generates chilling or spillover effects, recipients will cancel their benefit if they come to believe that receiving SNAP will threaten citizenship eligibility or increase the risk of deportation—either for themselves or someone in their household. Noncitizen parents afraid of scrutiny from immigration authorities could cancel benefits for their citizen children. A less likely but still plausible chilling effect is that naturalized citizens could fear denaturalization—either for themselves or others in their network.⁴ In their study of immigrant responses to the roll-out of Secure Communities—a federal program that allowed the U.S. Immigration and Customs Enforcement Agency (ICE) to check the immigration status of anyone arrested by local law enforcement—Alsan and Yang (2018) find that SNAP enrollment in households headed by Hispanic citizens declined by more than 10 percent after the activation of Secure Communities. Declines were even larger among mixed-citizenship households and in areas where deportation fear is high. Alsan and Yang's effects are consistent with findings from public health

studies about the decline of Medicaid participation when local police coordinate enforcement operations with federal immigration authorities.⁵

Evidence of the chilling effects of anti-immigrant policies on SNAP take-up can also be found in research related to the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA). PRWORA denied federal welfare benefits to most legal immigrants who entered the United States after August of 1996 for five years after immigration. While the legislation was intended to bar only new immigrants (post-1996 immigrants) from receiving benefits, PRWORA also reduced the enrollment of eligible legal immigrants who immigrated before 1996. Haider et al. (2004) report that after taking economic conditions and immigrants' heightened sensitivity to economic fluctuations into account, foreign-born participation in food stamps declined 14 percent after PRWORA. After controlling for state differences in eligibility, East (forthcoming) reports an 8 percentage point decline (roughly a 50 percent decrease) in SNAP participation rates among citizen children with non-citizen parents who became ineligible after PRWORA. Others have found similar post-PRWORA declines in Medicaid and TANF participation among eligible immigrant households (Fix and Passel 1999; Kandula et al. 2004; Watson 2014).

Data and Methods

To simulate the poverty impact of the DHS public charge proposal on the SNAP population, we use the Annual Social and Economic Supplement (ASEC) of the Current Population Survey for 2017 (2016 calendar year). The CPS is sponsored jointly by the U.S. Census Bureau and the U.S. Bureau of Labor Statistics. The CPS ASEC is the source for U.S. government poverty statistics.

In the following, we describe how we define the lower and upper bounds of the SNAP population that would be affected by the public charge proposal. Adjustment of status is the final stage of the lawful permanent residence (green card) application. In the proposed public charge regulation, DHS estimates the population affected based on the number of individuals submitting the I-485 Application to Register Permanent Residence or Adjust Status. According to the U.S. Citizenship and Immigration Services (USCIS) data in the public charge proposal, 565,427 foreign-born individuals applied for adjustment of status in the United States in 2016. This 565,427 figure is equivalent to approximately 2 percent of the total noncitizen population in the CPS. Thus, we use 2 percent of the noncitizen population as a lower bound of the population affected by the proposal. The true lower bound is higher than 2 percent because the USCIS data do not include those outside of the United States who are seeking entry.

³According to U.S. Immigration and Customs Enforcement (ICE) data, there was a 38 percent increase in the number of immigrants arrested between 2016 and 2017.

⁴While there is no historical precedent for denaturalizing citizens based on public benefit participation, in June of 2018, the U.S. Citizenship and Immigration Services created a task force of lawyers that will review cases of naturalized citizens who are suspected of applying for citizenship under false pretenses. Press accounts about the task force's activities could theoretically create a chilling effect for naturalized citizens.

⁵See Nichols et al. (2018) for a summary.

This lower bound scenario assumes that among the 2 percent of the noncitizen population who are seeking change of status, those living in SNAP households will cancel the SNAP benefit for their entire household.

There are two factors that may cause our lower bound estimate to be an overestimate of the actual scenario in which there is no chilling effect. First, the DHS proposal states that public charge determinations will not be affected by receipt of benefits by children in the household. Because we assume that the population affected will cancel their benefit for the entire household, our lower bound estimate includes a small chilling effect. The public-use CPS data indicate the number of people in the household covered by the SNAP benefit, but there is no indication of which people are covered. Second, according to the DHS proposal, immigrant households will only be subject to a public charge determination based on benefit receipt if (1) the cumulative value of one or more such benefits that can be monetized (i.e., where DHS can determine the cash value of such benefit) exceeds 15 percent of the Federal Poverty Guidelines (FPG) within a period of 12 consecutive months based on the per-month FPG for the months during which the benefits are received or (2) for benefits that cannot be monetized, the benefits are received for more than 12 months in the aggregate within a 36-month period. SNAP falls under the monetized category, but whether SNAP receipt is grounds for a public charge determination depends on the cumulative value of the monetary benefits received by the household and the duration of non-monetized benefit receipt. Unfortunately, we cannot be certain whether these two conditions are met using CPS data. We believe, however, that it is unlikely that everyone in SNAP households will be well versed in all of the technical provisions of the DHS regulation. For many households, canceling SNAP may be a more efficient option than verifying whether their household meets all of the public charge determination criteria.

Our upper bound scenario assumes that 35 percent of the noncitizen population will avoid taking up SNAP as a result of the proposed regulation, an estimate that is consistent with upper bound chilling estimates recently used by Artiga et al. (2018) in their analysis of the public charge proposal and post-PRWORA chilling effects. In both the lower and upper bound scenarios, eligible citizens could lose SNAP benefits if they live with a noncitizen who is assumed to be affected by the public charge policy.

We simulate poverty outcomes for our lower bound scenario, our upper bound scenario, and the entire range in between (2 percent to 35 percent of noncitizens affected). For each percentage share of the noncitizen population assumed to be affected by the public charge proposal (up to 100 percent), we draw 1,000 samples. For example, in the scenario that assumes 10 percent of the noncitizen population will be affected, we draw 1,000 10 percent samples of the noncitizen population. This sampling approach allows us to take into account uncertainty about the composition of the population

that will give up benefits. After drawing a sample, we identify noncitizens in SNAP households. For each noncitizen in a SNAP household in a given sample, we subtract the household's SNAP benefit from the calculation of household resources. Our outcomes of interest include the change in the child poverty rate and the number of children losing SNAP.

Our measure of poverty is based on the Supplemental Poverty Measure. In addition to SNAP, SPM resources also include the Earned Income Tax Credit (EITC); the National School Lunch Program; the Women, Infants, and Children Program (WIC); housing assistance; and the Low Income Home Energy Assistance Program (LIHEAP). Medical out-of-pocket expenses, work-related expenses, and child care expenses are all subtracted from SPM resources. SPM thresholds reflect contemporary purchasing patterns adjusted for the relative living expenses of metro and nonmetro areas within states.⁶ The SPM household includes foster children and cohabiters and their children (all SPM household members have the same resources). More details on the computation of the SPM can be found in annual Census Bureau SPM reports (e.g., Fox 2017).

We present results that are conditional on the size of the chilling effect. We acknowledge that the true chilling effect is unknown and that subpopulations and policy specifics differ across prior chilling effect studies. As DHS officials note in the proposed regulation (page 362), "PRWORA was directly changing eligibility requirements, whereas this proposed rule, if finalized, would change enrollment incentives." However, given anecdotal reports about SNAP disenrollment already underway based on leaked versions of the DHS proposal and the sensitivity of immigrant families to small changes in SNAP eligibility rules after PRWORA (Haider et al. 2004), we believe that prior studies can provide an indication of what to expect should the DHS proposal become a DHS regulation.

Although the CPS is the data source used to calculate the official U.S. SPM poverty rate, recent analyses by Census Bureau researchers linking CPS with administrative data find that 46 percent of SNAP recipients (according to administrative records) do not report receipt in the CPS; only 54 percent of SNAP recipients in administrative records also report receipt in the CPS (Stevens, Fox, and Heggeness 2018).⁷ Our results show the SNAP population before and after taking underreporting into account.

⁶See Nolan et al. (2016) for a detailed description of the geographical adjustments and historical trends for each state.

⁷The Urban Institute's Transfer Income Model (TRIM) is a micro-simulation model that has been used by researchers as an alternative to the regular Current Population Survey (CPS). TRIM imputes SNAP receipt by identifying eligible units and then selecting additional participants until the imputed CPS data match administrative targets for number of recipients, available demographic characteristics, and total benefit amount. In their study linking CPS, TRIM, and

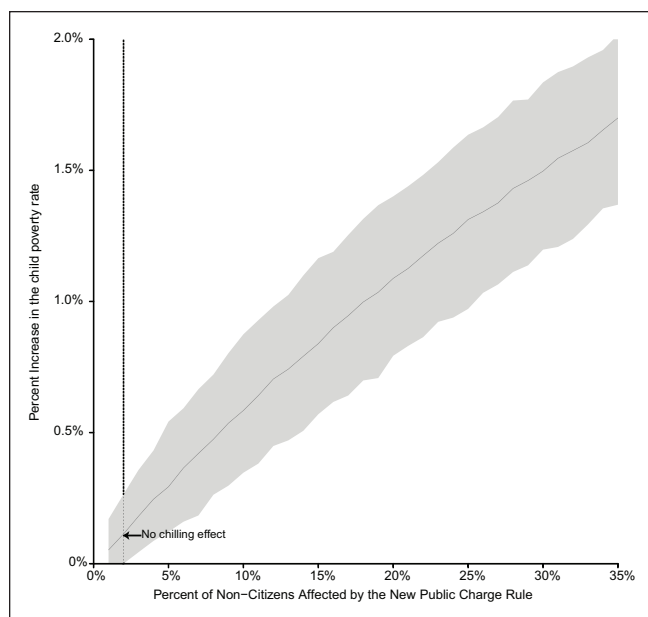


Figure 1. Percentage increase in Supplemental Poverty Measure child poverty rate conditional on the chilling effect of the proposed public charge rule on noncitizen Supplemental Nutrition Assistance Program (SNAP) participation.

Source: 2017 Current Population Survey.

Note: The solid line represents the median (50th percentile) estimate of the 1,000 samples that were drawn for each percentage share of the noncitizen population assumed to be affected by the public charge rule. The shaded area around the solid line shows the range of estimates from the 5th percentile to the 95th percentile. 2017 CPS.

Findings

Figures 1 and 2 show our estimates of the potential impact of the public charge proposal on the child poverty rate and the number of people potentially impacted. In both figures, the solid line represents the median (50th percentile) estimate of the 1,000 samples that were drawn for each percentage share of the noncitizen population assumed to be affected. The shaded area around the solid line shows the range of estimates from the 5th percentile to the 95th percentile.

We first show how the SPM child poverty rate increases depending on the percentage of noncitizens who are affected by the public charge proposal (Figure 1).

administrative data, Stevens, Fox, and Heggeness (2018) find that while TRIM reduces the underreporting rate to 36 percent (vs. 46 percent in the regular CPS), TRIM produces false positives, namely, individuals receiving SNAP in the TRIM CPS data but not in administrative data. These false positives are clustered around the bottom of the income distribution. Compared with Supplemental Poverty Measure (SPM) rates estimated using administrative records, the CPS Annual Social and Economic Supplement (ASEC) overestimates the overall SPM rate by .4 percentage points, whereas using TRIM3 SNAP data underestimates the SPM rate by .5 percentage points. For this reason, we do not use the TRIM imputations.

Figure 1 shows a wide range of estimates. If we assume that the only people giving up their household SNAP benefit are those planning to apply for green cards in the next 12 months (no chilling effect), the increase in the child poverty rate is approximately .001 percent. Under this scenario, slightly more than 10,000 children fall into poverty. If we assume that 35 percent of noncitizens will refuse SNAP for their household (our upper bound scenario), the child poverty rate increases by 1.7 percent. While a 1.7 percent increase might not seem large—the child poverty rate would increase from 15.6 percent to 15.9 percent—an increase of this size would push nearly 200,000 children into poverty.

We next examine the size of the SNAP population affected by the public charge proposal before and after adjusting for underreporting. The left plot in Figure 2 shows the number of people losing SNAP conditional on the chilling effect without adjusting for underreporting. Consistent with Stevens et al.'s (2018) finding that the actual SNAP population is 85 percent ($46/54 = .85$) larger than the SNAP population in the CPS, the right plot in Figure 2 increases the population affected by 85 percent.

We first discuss the results without taking SNAP underreporting into account (the left plot of Figure 2). If we assume no chilling effect, our simulation indicates that approximately 300,000 people will lose access to SNAP, more than a third of whom are U.S. citizen children. According to the upper bound chilling effect, nearly 2 million children (most of whom are U.S. citizens) will no longer have access to SNAP. It is important to note that the economic impact will be substantial—even without a chilling effect and without taking underreporting into account. If only 2 percent of the noncitizen population chooses not to take up SNAP, more than \$100 million in SNAP benefits will be left on the table.

After adjusting the number affected based on Stevens et al.'s (2018) estimate of SNAP underreporting in the CPS (the right plot in Figure 2), our simulation suggests that depending on the chilling effect, up to 2.7 million U.S. citizen children could lose access to SNAP.

Labor Supply Response

To make up for the lost assistance, some of the adults in the households giving up their SNAP benefit may work more after canceling their benefit. If this is the case, then the increase in poverty will not be as large as what we report in Figure 1. While the true labor supply effect is unknown—especially for undocumented adults who are not legally eligible for work—we can estimate the total increase in income that noncitizen households would have to generate to make up for the lost SNAP benefit.⁸ In the 2017 CPS, the average

⁸To date, the most rigorous study of a labor supply response to federal food assistance is Hoynes and Schanzenbach's (2012) study of the county level rollout of the food stamp program in the 1960s

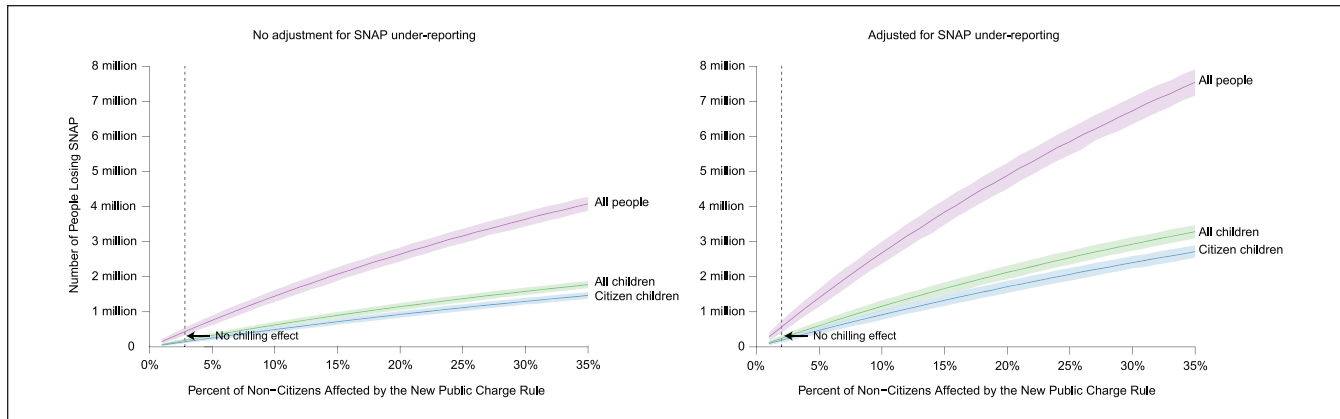


Figure 2. Total number of people losing Supplemental Nutrition Assistance Program (SNAP) conditional on the chilling effect of the public charge proposal.

Source: 2017 Current Population Survey.

Note: The solid line represents the median (50th percentile) estimate of the 1,000 samples that were drawn for each percentage share of the noncitizen population assumed to be affected by the public charge rule. The shaded area around the solid line shows the range of estimates from the 5th percentile to the 95th percentile.

SNAP benefit for SPM households with noncitizens is \$3,000 per year. Median annual cash income for these households is roughly \$27,000. The typical SNAP household with noncitizens would have to increase their income by more than 10 percent to make up for their lost SNAP benefit.

Conclusion

This study examines the potential poverty impact of the SNAP provision in the proposed DHS public charge regulation. Of the SNAP participants potentially affected by the proposal, approximately a third are U.S. citizen children. Depending on how noncitizens respond to the proposal and whether the proposal becomes policy, up to 7.9 million people (2.9 million of whom would be U.S. citizen children) could lose access to food assistance. In the absence of a large labor supply response, a mass exodus of mixed-status households from the SNAP

program will lead to a substantial increase in the child poverty rate (Figure 1).

Our simulation only focuses on the SNAP population. The DHS proposal also targets recipients of Medicaid and public housing assistance. Moreover, if the proposed regulation reduces enrollment in programs not included in the new definition of public charge—school meal programs, for example—or reduces the enrollment of eligible citizen families in cash assistance programs (already included in the definition of public charge), the child poverty effects will be substantially larger than what we report in this analysis.

Authors' Note

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and 1970s. Hoynes and Schanzenbach report that heads of household who took up food stamps in the 1960s and 1970s reduced their employment rate by 24 to 27 percentage points (a treatment-on-the-treated reduction of 505 annual hours)—a large effect, although it was statistically indistinguishable from zero in their data. Hoynes and Schanzenbach's findings predate an expansion of the Earned Income Tax Credit (EITC), large increases in female labor force participation, a large decline in female wage elasticities during the 1980s, and the introduction of SNAP and Temporary Assistance for Needy Families (TANF) work requirements after 1996 welfare reform. These changes affect both program participation and work incentives. More recent research by East (2018) using CPS data to understand immigrant labor supply after welfare reform finds employment effects that are similar in magnitude to Hoynes and Schanzenbach's effect.

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