



OFFICE OF THE PRESIDENT
1111 Franklin Street
Oakland, California 94607-5200

December 19, 2025

The Honorable Kristi Noem
Secretary
U.S. Department of Homeland Security
2801 Nebraska Avenue, NW
Washington, D.C. 20528

RE: DHS Docket No. USCIS-2025-0304

Dear Secretary Noem,

On behalf of the University of California (UC) system, we write to share concerns about the U.S. Department of Homeland Security's (DHS) proposed rule (DHS Docket No. USCIS-2025-0304) to expand the list of federally-financed public benefits that could be considered in a lawful immigrant's "public charge" inadmissibility determination.

DHS's proposed expansion of the public charge definition penalizes lawful immigrants for accessing medical care, nutrition assistance, housing assistance and other vital benefits for which they should be eligible by jeopardizing their ability to remain on the path towards United States citizenship. The proposal is counterproductive to American competitiveness and the University's mission. As a public institution, the University has a commitment to protect public health and safety, as well as to promote education and research opportunities for a broad community of faculty, students and employees for the benefit of our country and society.

The proposed rule, if implemented, will undermine the capacity of UC Health to fulfill its tripartite mission of providing high-quality patient care, training the next generation of clinicians and innovating medical cures. UC serves those in need of health care regardless of their circumstance. UC Health is an essential part of the state's health care delivery system, operating the nation's largest health sciences education program, which includes six academic health centers and 21 health professional schools. As designated public hospitals, UC's academic health centers provide high-quality care to those in need, regardless of their insurance status or ability to pay. We provide care for patients' everyday health needs, as well as those with the most complex cases, including cancer, burn, transplant and trauma care. The University urges DHS not to expand the definition of public charge to include non-emergency Medicaid benefits. This proposed rule could discourage many patients from accessing medical care for fear that doing so might jeopardize their immigration status. Delaying or foregoing care could ultimately lead to adverse and costly health outcomes for society, including greater prevalence of communicable diseases, reduced prescription adherence, and increased usage of emergency rooms and emergent

care arising from a delay in treatment. For the same reason, UC Health does not support expanding the definition of public charge to include Children's Health Insurance Program (CHIP) benefits. Children, like adults, can only thrive when they have access to non-emergency medical care.

The proposal threatens to compromise the food and nutrition security of immigrants and citizens, which will limit the effectiveness of preventative nutrition programs, such as the Supplemental Nutrition Assistance Program (SNAP) and school meals. UC is also concerned that the expansion of monetizable benefits in the proposed rule would include basic need programs such as SNAP, which provides benefits to low-income households, including college students and their families, to purchase food. The inclusion of SNAP as a benefit that could trigger a public charge determination may lead to limiting food access for those who may otherwise be eligible, since people may choose to forgo applying for benefits. Collectively, the proposed rule is likely to overburden our health care system by exacerbating serious health conditions and increasing emergency care.

The idea that individuals and families may choose not to apply for benefits, could exacerbate food insecurity for many students and their families across California and the country. This would be counterproductive to the administration's goals to reform America's food, health and scientific systems to identify the root causes of the chronic disease epidemic. Healthier diets are closely associated with health and wellbeing, whereas poor diets are linked to severe medical, psychological and social consequences, including excessive health care costs. Estimates suggest that up to 85% of all health care costs originate from diet-related chronic diseases. Further, more than two-thirds of adults and nearly one-third of children and youth are overweight or obese. SNAP and other food access support programs help to improve nutrition—and limiting access to these programs would increase the already excessive diet-related health care costs that are consuming nearly one-quarter of our annual national budget, costing the country \$50.4 billion per year.

UC is also concerned that the inclusion of SNAP benefits in the proposed rule could lead participants in other programs, such as the Expanded Food and Nutrition Education Program (EFNEP). Some EFNEP participants may believe that their participation in this program could be considered in a public charge determination, and therefore, impact their ability to seek any future changes to their immigration status. UC urges DHS not to expand the definition of public charge to include SNAP or any other food benefits.

The University is also concerned that the proposed rule could further diminish international student enrollment by erecting barriers to studying in the United States. America benefits when we allow the best and the brightest from around the world to come study and innovate here. International collaboration is critical, but the proposed rule could depress this by discouraging students and scholars from pursuing international studies, as well as from accessing public benefits for which they are eligible, for fear of reprisal or becoming inadmissible under a public charge determination.

Secretary Kristi Noem

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We ask for your thoughtful consideration of the concerns we have shared. If you have any questions or concerns about this comment letter, please contact Chris Harrington, Associate Vice President in UC's Office of Federal Governmental Relations, at Chris.Harrington@ucdc.edu or (202) 997-3150.

Sincerely,

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A handwritten signature in black ink, appearing to read 'CHARRINGTON', followed by a long horizontal line extending to the right.

Chris Harrington
Associate Vice President
Office of Federal Relations
University of California