

U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW
Washington, DC 20529-2140

Re: DHS Docket No. USCIS-2010-0012, RIN 1615-AA22, Comments in Response to Proposed Rulemaking: Inadmissibility on Public Charge Grounds

To Whom It May Concern:

On behalf of New Leaders, I am writing to express our concern with the Department of Homeland Security's (DHS) Notice of Proposed Rulemaking (NPRM) on inadmissibility on public charge grounds.

New Leaders transforms underperforming schools by developing outstanding leaders at every level of the education system – from teacher leaders to principals and their supervisors. We work hand in hand with our state, district, and charter partners, delivering leadership solutions that build on their strengths and address their most pressing priorities. Our evidence-based programming cultivates diverse, equity-driven leaders equipped with the skills to elevate instruction, enhance learning, and build vibrant, inclusive school communities. To encourage widespread adoption of effective, sustainable leadership practices, we also advocate for federal and state policies that support the work of school leaders everywhere. To date, New Leaders has trained 3,900 education leaders who annually reach 440,000 young people, mostly students of color and children from low-income families, delivering breakthrough academic results and building brighter futures for high-need urban and rural communities nationwide.

School leaders are responsible for creating safe, supportive, and inclusive school environments for *all* students and their families. As such, principals and other school leaders marshal school resources to support their students' academic, social-emotional, and physical wellbeing. These resources include well-trained teachers and high-quality, well-rounded curricula. Further, schools often serve as a connection point between children and the services and supports that they and their families need to thrive – from providing students with nutritious meals to connecting children and their families with medical care and housing assistance.

When children come to school healthy, well-rested, and well-fed, they can more fully engage in their education. This whole-child approach sets students up for success in college, career, or wherever their aspirations may take them.

We are concerned that the proposed changes to the public charge regulation could undermine school leaders' efforts to address the holistic needs of all their students, regardless of their immigration status or that of their parents, by creating barriers for immigrant families, including those with U.S.-born children, to access essential support today that will set them up to become productive citizens tomorrow. Any policy changes that threaten the security and wellbeing of our nation's children – including their ability to access food, medical care, and housing – are unacceptable.

We urge the Department of Homeland Security to reconsider its proposed changes, and we thank you for your consideration of our comments.

Sincerely,
Jean Desravines, CEO
New Leaders