



December 15, 2025

Kristi Noem  
Secretary  
U.S. Department of Homeland Security  
2707 Martin L. King Avenue SE  
Washington, D.C. 20528

Dear Secretary Noem:

On behalf of H-STAT, an interprofessional graduate student advocacy organization dedicated to improving the health for Georgians, I appreciate the opportunity to comment on [“Public Charge Ground of Inadmissibility” \(CIS No. 2836-25; DHS Docket No. USCIS-2025-0304\)](#) notice of proposed rule making (NPRM). H-STAT strongly opposes this proposed rule and the harm it would inflict on immigrant families’ health and stability. By removing clear definitions from the 2022 framework and granting broad discretion to officers, the rule creates fear and uncertainty that will [discourage patients](#) from seeking the services they need.

As medical and health-professional trainees, many of us work in FQHCs and see firsthand how essential access to routine care is for undocumented, DACA, and TPS patients. When families avoid clinics due to immigration concerns, they often [present later in crisis](#), increasing emergency room crowding and [overall healthcare costs](#). We have also seen how programs like Medicaid, nutrition support, and early childhood services improve child development and health outcomes. Policies that deter families from using these benefits directly undermine the well-being of the communities we serve.

The proposed rule’s expanded discretion and punitive bond provisions will intensify health disparities, worsen preventable illness, and destabilize mixed-status families. We urge DHS to reconsider this rule and maintain a clear, narrow, and humane public-charge standard that protects access to essential services for our most vulnerable patients.

Thank you for your consideration on the issue. We look forward to working with you to promote the health of Georgians. If you have any questions, please contact Anjali Patel at [anjali@healthstatgeorgia.org](mailto:anjali@healthstatgeorgia.org).

Sincerely,

Anjali Patel  
H-STAT Immigration Health Director  
Health Students Taking Action Together (H-STAT)