

**From:** pif-ca@googlegroups.com  
**Subject:** PIF campaign instructions & guidelines for commenting on proposed rule  
**Date:** Friday, May 18, 2018 12:06:37 PM

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Hi all, please read through these as you prepare your comments for the public charge proposed rule. Do share with others who are drafting comments as well.

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### Protecting Immigrant Families Campaign

As you are drafting your comment, here are some important tips to keep in mind.

**Write comments in your own words.** Agency staff must code and organize all comments, and the process is very different if they have to pause and consider what's similar and what's different in each comment, as opposed to just counting the number of commenters saying the same thing. It's fine to work off of a sample comment, but you should modify it to reflect your own thoughts and experiences so that it counts as a *unique* comment. Here are a few recommended approaches.

- If you are an expert on a particular program, please detail how that program improves people's lives. For example: *I oppose the proposed public charge rule that would force millions of children and families to disenroll from cooling and heating assistance programs and expose them to unsafe and unhealthy conditions. (add data and examples)*
- If you work directly with immigrants, please describe why they usually come to the country; how they use government benefits, what it means for the well-being of them and their children; and how they contribute to their families and community.
- If you are a concerned individual that thinks this is wrong, explain what you think our country's values should be and why this change goes against it. You can also talk about the role that access to benefits has played in your own life. For example: *I am a breast cancer survivor and the healthcare that I received allowed me continue working, caring for my two small children, and participating in my community. I received essential screening, surgery and follow up treatment that saved my life. Without this treatment, I would not have lived to take my children to school, feed them, and watch them grow up. We must ensure that all residents have access to care, regardless of where they or their parents were born.*
- If you have family members that were immigrants, describe their experience, especially if you can point to their contributions to America.

**Submit separate comments, rather than signing onto comments from someone else.** Agencies need to count how many comments they receive. If five people or organizations sign onto one comment letter, that counts as one comment. If they each send in their own comments, that counts as five comments.

**Don't suggest corrective language.** Our ultimate goal is to stop this rule from moving forward. Therefore, while it is important to raise concerns, we do not recommend suggesting ways that the agency can "fix" the proposed language.

**Don't discuss programs that aren't specifically included in the NPRM.** Highlighting programs that are not specifically mentioned on the included or excluded list could give the agency cover to include those programs in the final rule, even though they aren't in the NPRM.

**Attach research and supporting documents.** If you cite to research and supporting documents in your comments, we also recommend including them as attachments so that they are clearly part of the administrative record.

**Provide translations of non-English comments.** The NPRM requests that all comments be submitted in English. While we do not in any way endorse this restriction, we want to ensure that comments from non-English speaking individuals can be counted. Therefore, we recommend that for non-English comments both the original and a translation should be submitted together, along with a statement from the translator which verifies the accuracy of the translation. Something like: *I, [translator's name], hereby declare that I am fluent in [language] and English and that this translation is a true, accurate and complete version of the original text to the best of my knowledge.*

**When possible, avoid completely anonymous comments.** If an individual does not want to disclose their name or contact information, we recommend having a friend or representative submit the comment on their behalf rather than submitting the comment anonymously. A health worker or attorney could submit comments on behalf of multiple clients, and should acknowledge their relationship to that person in the comment to provide context and legitimacy.

**When you submit your comments, please also share them with the Protecting Immigrant Families Campaign.** After you hit send on your comments, please take a minute to file them with the PIF Campaign [here](#). There is often a lag time between when comments are submitted to the federal government and when they are available publicly. The PIF Campaign is developing a plan to review comments submitted by allies and extract the most helpful data, stories, arguments, and other messages that will help with our advocacy work and possibly litigation. Please file the comments with your organization's name. For example, "The National Health Law Program Final Comments on Public Charge NPRM." And please suggest that your partners and members do the same.

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