

The Public Charge Rule & Young Children: Q&A on the New Regulation

UPDATE as of February 24, 2020 In August 2019, the Trump Administration published a final “public charge” regulation. The changes make it harder for lawfully present immigrants to obtain long-term status if government officials determine they are likely to use one or more public benefit programs such as the Supplemental Nutrition Assistance Program (SNAP), Medicaid, or housing assistance in the future. This “public charge” determination is based on a range of factors, such as the person’s age, health, or income and does not apply to all immigrants.

The regulation had been on hold since August, but on January 27, 2020, the Supreme Court ruled that the administration can implement the new public charge regulation while litigation continues.

The new standards are effective as of February 24, 2020. Health care, nutrition, and housing assistance benefits used before February 24 are not considered.

This regulation could harm the health and wellbeing of millions of people and is of great concern for young children’s development and the early childhood field. One in four young children has at least one immigrant parent.¹

Already, the proposal has made immigrant families afraid to seek programs that meet their needs for healthy food, stable housing, and medical care. In CLASP’s field research with immigrant parents and early childhood programs, we heard stories of families withdrawing from nutrition and health care programs and avoiding health clinics out of fear. Many families were reluctant to participate in programs that are not included in the regulation, like home visiting.²

Early childhood programs are trusted resources for immigrant families. It is critical that early childhood stakeholders—including policymakers, advocates, and service providers—understand the content and implications of the regulation so they can communicate information clearly to their staff, community members, and immigrant families.

This Q&A provides an overview of public charge provisions, how the regulation will affect immigrant



families with young children, and other important information specifically for the early childhood community. The information in this document is based on CLASP’s analysis of the public charge regulation and is not legal advice.

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1. What is “public charge”?

The “public charge” test is a longstanding provision in immigration law designed to identify people who may depend on government benefits as their main source of support in the future. If the government determines someone is likely to become a “public charge,” it can deny them admission to the United States or refuse their application for lawful permanent residency (a green card). Many immigrants are worried about being deemed “likely to become a public charge” because it can prevent reunification with family members and the ability to achieve long-term stability in the United States.

2. When is the new public charge regulation effective?

The new public charge regulation is effective as of **February 24, 2020**. This means that green card applications postmarked or submitted electronically on or after February 24 will be subject to the new, broader public charge test.

Keep in mind that while the Supreme Court has allowed the regulation to be implemented while multiple lawsuits are proceeding in federal courts, **the fight is far from over**. The regulation could still be struck down on the *merits* of whether the regulation itself or the manner in which it was adopted is legally valid.

3. Why is it important for early childhood policymakers, advocates, and providers to understand public charge?

Children in immigrant families are a large and growing share of the U.S. young child population. Many immigrant families rely on their early care and education providers for resources and support. Families are certain to have questions about the regulation and whether it is safe for them to continue receiving public benefits. They may also misunderstand how the new public charge regulation affects program eligibility and want to know their personal information is safe.

Early childhood policymakers, advocates, and providers must be prepared to communicate effectively about the new regulation with members of the field, as well as with immigrant families and others in the community. In our research, CLASP learned that families are increasingly afraid to access programs such as nutrition assistance and public health insurance for their children. Some are

even reluctant to bring their children to school or child care. Early childhood providers must be prepared to share accurate, up-to-date information and to connect immigrant families to important resources in the community.

4. Who does the public charge test apply to? Which immigrants are exempt from the public charge test?

The public charge test applies in two primary circumstances:

- When immigrants seek admission to the United States from abroad on a permanent or temporary visa; and
- When immigrants apply to adjust their status to lawful permanent resident from within the United States (in other words, apply for a green card).

The public charge test is also applied when a green card holder attempts to re-enter the United States after being out of the country for more than 180 consecutive days.

The public charge test **does not** apply to immigrants who have already applied for or received one of the following statuses. These exceptions are encoded in law and cannot be changed by executive or administrative actions.

- U.S. citizenship
- Green card **renewal**
- DACA renewal
- Temporary Protected Status (TPS)
- U or T visa (for victims of human trafficking and other crimes)
- Asylum or refugee status
- Special Immigrant Juvenile Status (SIJS)

5. What should I tell the families I work with about public charge?

As trusted resources for immigrant families, early childhood providers are likely to get questions about how changes to public charge affect the families you serve. You will most likely encounter parents who are concerned about how their children's use of benefits (and in rare cases, their own use of public benefits) will affect the parent's ability to gain permanent status in the future.

Public charge policy is complicated and confusing—even for immigration policy experts. While this Q&A answers technical questions about public charge, these top-line messages are important to remember when talking to immigrant families with young children:

- **Many immigrants will not be affected by the changes to public charge.** Refugees; asylees; survivors of trafficking, domestic violence, and other serious crimes; and other vulnerable immigrants are exempt from public charge determinations. Lawful permanent residents are **not** subject to the public charge test when they apply to renew their status or for U.S. citizenship.
- **The new standards are not retroactive.** Nutrition, housing, and health insurance benefits used before February 24, 2020 are **not** considered in public charge determinations.
- **Your children's benefit use is not considered in your public charge determination.** Programs like SNAP, Medicaid, and housing assistance can keep children healthy and provide a strong start in life.
- **The use of public benefits alone does not automatically make you a public charge.**

Immigration officials must look at all your circumstances in determining whether you are likely to become a public charge in the future. Public benefit use is just one of those factors.

- **Changes to public charge policy do not affect eligibility for public programs and services.** Eligibility rules for public benefit programs and early care and education programs have not changed.
- **Your personal information is protected.** Federal and state laws protect the privacy of people who apply for or receive health care coverage, nutrition, economic support, or other public benefits.
- **The fight against public charge continues.** The Supreme Court ruling is a setback, but lawsuits challenging the legality of the regulation are still playing out in court and the regulation may eventually be struck down. What's more, many Americans disagree with Trump's hateful regulation, and they are speaking out against it.

Keep in mind that each situation is different. Families will need to make decisions based on their unique circumstances and needs. As an early childhood provider, it's important to be able to answer basic questions and connect families to resources. You are not expected to be an immigration policy expert or to give legal advice. We encourage you to identify trusted legal service providers in your community and provide a warm handoff for families who need legal advice on their specific circumstances. You can use this online directory to search for local nonprofit organizations that provide free or low-cost immigration legal services: <https://www.immigrationadvocates.org/nonprofit/legaldirectory/>.

6. How does the “public charge” test change under the new regulation?

When evaluating whether a person is likely to become a public charge, immigration officials must consider certain factors: age; health; family status; assets, resources, and financial status; and education and skills. Officials are required to consider the “totality of circumstances” for each individual. This means that no single factor alone can make someone likely to become a public charge.

In other words, immigration officials make a forward-looking determination as to whether a person is more likely than not to use public benefits (historically, this meant cash assistance or government-funded long-term care) **in the future**. Previous or current receipt of named benefits is one of several factors that officials consider when determining whether a person is likely to use them in the future.

The new regulation makes three primary changes to longstanding public charge policy:

1. Expands the definition of public charge from a person who is *primarily dependent* on government assistance as their main source of support, to a person who *receives one or more public benefits* for more than 12 months in the aggregate within any 36-month period (such that receipt of two public benefits in one month would count as two months).
2. Adds new factors to the “totality of circumstances” test, designed to make it harder for people with low and moderate incomes to pass the test, regardless of whether they have used public benefits in the past.
3. Allows immigration officials to consider additional government programs and services in a public charge determination.

It is important to emphasize that the public charge test remains **forward-looking** under the new regulation. Immigration officials are considering whether a person is likely to become a public charge—or in other words, more likely than not to use particular public benefits—**in the future**. Applicants for admission or permanent residence can still make their best case to show why they are not likely to become a public charge.

7. How will the new regulation affect young children in immigrant families?

Given the demographics of immigrant families with young children, the changes to public charge will primarily affect children whose parents hope to obtain permanent status in the future. Keep in mind that many immigrants are not affected by the changes to public charge policy. For example, certain categories of immigrants—such as refugees, asylees, and other “humanitarian” immigrants—are **not** subject to public charge determinations. Public charge is not relevant when lawful permanent residents renew their status or apply for U.S. citizenship.

Additionally, **children’s use of benefits does not affect a parent’s public charge determination.** You should assure parents that their U.S. citizen-children can continue to access programs for which they are eligible, including SNAP, Medicaid, housing assistance, and other public benefit programs.

The families you work with may also include immigrant children who will apply for permanent status in the future. **An immigrant child’s own use of SNAP, housing assistance, cash assistance, or long-term care at government expense can count negatively in the child’s own public charge determination under the new regulation.** The regulation includes an exception for Medicaid use by immigrants under the age of 21, so immigrant children can continue to use Medicaid until that age without consequence in their own public charge determination. If parents are concerned about their immigrant child’s use of benefits for which they are eligible, you should refer them to an immigration lawyer.

8. How does the “totality of circumstances” test change under the new regulation?

Public charge statute **requires** officials to consider the “totality of the circumstances” in public charge determinations. This means that immigration officials must look at all factors that relate to an immigrant’s ability to provide for themselves, including their age, health, income, assets, resources, education/skills, family members they support, and family who will support them. Officials may also consider whether a sponsor has signed an “affidavit of support” (a contract) promising to support the noncitizen. The “totality of circumstances” test means that no single factor alone can make an immigrant likely to become a public charge. This is encoded into law and cannot be changed by regulations.

The new regulation requires immigration officials to weigh certain positive and negative factors in a public charge determination. For example, having a household income of less than 125 percent of the federal poverty guidelines (or FPG; which is \$32,187 annually for a family of four) would factor negatively into a public charge determination. Other negatively weighed factors include but are not limited to:

- Having a health condition or disability;
- Receiving named public benefits in the past;
- Having dependent family members; and
- Being too young (under 18) or too old (older than 61) to work.

The only factor that weighs positively in an immigrant’s favor during a public charge determination is having a household income over 250 percent of the FPG (\$64,375 annually for a family of four).

These changes effectively turn public charge determinations into a wealth test. Under the new regulation, it will be much harder for low- and moderate-income immigrants—particularly those who are children, seniors, parents, and/or disabled—to overcome a public charge test. The changes to public charge policy would also disproportionately harm immigrants of color.

Since the test looks at overall circumstances to make a determination about a person’s situation in the future, no one factor is definitive. Negative factors (such as not having a job) can be overcome by positive factors (such as having completed training for a new profession).

9. How does the new regulation consider the use the public benefits in a public charge determination?

The new regulation allows government officials to consider additional benefits in a public charge determination, including:

- Government-funded long-term institutional care (countable under the previous regulation as well);
- Any federal, state, local, or tribal cash assistance for income maintenance, including Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI) and general assistance programs (countable under the previous regulation as well);
- Medicaid (with exceptions including coverage for emergency services, children under 21 years old, pregnant women, and 60 days of post-partum services);
- SNAP, formerly called “food stamps”; and
- Federal public housing, Section 8 housing vouchers, and Section 8 project-based rental assistance.

This means that immigration officials make a determination about whether a person is more likely than not to use the benefits listed above **in the future**. Current or previous receipt of any of these benefits is one of several factors officials consider when making this determination. Receiving one or more public benefits for a total of 12 months or more within any 36-month period—such that receipt of two public benefits in one month counts as two months of benefit receipt—will be weighed negatively in a public charge determination.

It is important to keep in mind that DHS does **not** consider:

- Any benefits not listed in the regulation (see Question 10 below).
- Benefits received by an applicant’s family members (including their children).
- Non-cash programs funded entirely by states, localities, or tribes.

If you work with military families: Note that benefits received by active duty service members, military reservists, and their spouses and children do **not** count against those individuals in a public charge determination.

If you work with refugees, asylees, or other vulnerable populations: Note that benefits received by immigrants while in a status that is exempt from a public charge determination (e.g., time spent as a refugee) are not be held against them if they apply for admission into the United States or for LPR status

under a different pathway. If parents have questions about whether public charge might apply to them, you should refer them to an immigration advocate.

10. What benefits are included and excluded in the new regulation?

Benefits INCLUDED in public charge determinations

Under the new regulation, officials weigh current or past receipt of one or more of the following public benefits in a public charge determination (*indicates program was included under previous policy):

- Cash assistance (SSI, TANF, and state or local cash benefit programs that supplement income)*
- Government-funded long-term institutional care*
- Supplemental Nutrition Assistance Program (SNAP or food stamps)
- Housing Assistance (public housing or Section 8 housing vouchers and rental assistance)
- Non-emergency Medicaid (note that Medicaid will **not** be considered in public charge determinations for children under age 21 and pregnant women up to 60 days post-partum)

Benefits EXCLUDED from public charge determinations

The new regulation specifies that any non-cash benefits not listed in the regulation are excluded. This means the following programs are NOT relevant in public charge determinations:

- | | |
|---|---|
| • Head Start and Early Head Start | • School breakfast and lunch |
| • Child care assistance, including the Child Care and Development Block Grant (CCDBG) | • Energy assistance (LIHEAP) |
| • Public education services, including state pre-kindergarten and services through the Individuals with Disabilities Education Act (IDEA) | • Non-cash TANF benefits |
| • Home visiting | • Federal Earned Income Tax Credit (EITC) and Child Tax Credit (CTC) |
| • Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) | • Student loans |
| • Children's Health Insurance Program (CHIP) † | • Low-income subsidy for prescription drug costs under Medicare Part D† |
| | • Disaster relief |
| | • Emergency medical assistance |
| | • Advance premium tax credits under the Affordable Care Act |

† Note: DHS requested comments on including CHIP in public charge determinations in the proposed regulation, but CHIP remains an excluded benefit in the final regulation. Medicare Part D was included in public charge determinations in the proposed regulation but was excluded in the final regulation.

11. Are parents penalized in a public charge determination if their children receive benefits?

No. Benefits directly received by children—including U.S. citizen-children—do not factor into a parent’s public charge determination. Public charge determinations only include receipt of benefits by the immigrant in question. That means parents can continue to enroll their children in public benefit programs without consequence to them.

However, the use of SNAP, housing assistance, cash assistance, or long-term care at government expense by children who are immigrants can count towards their **own** public charge determination. Medicaid use does not count against individuals under the age of 21.

12. How does past benefit use impact an immigrant’s public charge determination?

The public charge test is forward-looking based on the totality of a person’s circumstances. Immigration officials may consider past use of benefits as one factor in making public charge determinations.

However, the Department of Homeland Security made it clear that the regulation is not retroactive. This means that use of SNAP, Medicaid, or housing assistance in the past and up to the effective date is not considered in a public charge determination. Since the implementation of the regulation was delayed, the new effective date is February 24, 2020. This means that nutrition, housing, or health insurance benefits used on or before February 24 are not considered in public charge determinations.

13. Does the public charge regulation affect immigrant families’ eligibility for public benefits or early childhood programs?

No. Public charge is a provision in immigration law and has no bearing on immigrant eligibility for publicly funded programs, services, or benefits—including early childhood programs. Early childhood programs should continue to follow existing rules and restrictions about asking questions and collecting data related to a child’s or parent’s immigration status. Make sure staff are aware of eligibility requirements for different programs. For more information about immigrant eligibility for public programs and services, see [Related Resources](#), p. 13.

14. How many people are impacted by the changes to public charge?

The new regulation has consequences for public benefit use among a small number of individuals. However, the regulation’s expanded criteria have much broader implications and will harm many people seeking opportunity and long-term status in the United States.

We also know that changes to public charge regulations don't just affect individuals who are subject to the public charge test. Researchers, advocates, and even the Department of Homeland Security itself anticipate a significant "chilling effect," meaning that people who are not directly affected by the regulation will decline to use public programs and services out of fear and confusion. This could have consequences for the health and wellbeing of an estimated 9.2 million children, including immigrant children and citizen-children with immigrant parents.³ Already, research and media reports affirm that many families are refusing services out of confusion and fear.

Children do best when their parents are healthy, when their families have enough to eat, and when their family's income is stable. Ensuring that eligible families can use services that meet their nutrition, health care, and other essential needs keeps children learning, parents working, families strong, and allows all of us to contribute fully to our communities.

15. What should I tell families who are worried that immigration officials can access their personal information if they enroll in public benefit programs?

Many immigrant parents who are reluctant to enroll in public benefits for themselves or their eligible family members have concerns about sharing their private information with the government. They worry that personally identifiable information submitted with a program application could be shared with immigration enforcement agencies. Confusion over existing privacy protections can also deter enrollment in public programs, including early childhood programs.

You can assure families that federal and state laws protect the privacy of people who apply for or receive health care coverage, nutrition, economic support, early care and education, and other publicly funded programs. Benefit agencies may share the information they collect with other government agencies **only** for purposes of administering their programs, with limited exceptions—such as a court order.

Public program applications should not request information about the immigration status of people who are applying to get benefits for another person in their family or the household. Non-applicants may be required to include information such as their income, but they are not required to provide information about their immigration or citizenship status. This means that immigrant parents applying for benefits on behalf of their U.S.-citizen child should not have to answer any questions about their own immigration status.

You can let parents know that they only need to fill out the required fields on an application form. Parents can refuse to provide optional information or documentation if they wish.

For more information about existing privacy protections, see **Related Resources**, p. 13

16. What can my agency, program, or organization do to minimize the "chilling effect" of the new regulation?

Early childhood policymakers, advocates, and practitioners have an important role in combatting the chilling effect of the public charge regulation threat and supporting access to health, nutrition, housing, and other programs for immigrants and their families. Key actions include:

Ensuring staff receive basic training on the public charge regulation. It's particularly important that staff working directly with families—including child care resource and referral agency staff, home visitors, family engagement specialists, enrollment specialists, and others—have basic information about public charge, including:

- How public charge policy changes under the new regulation;
- Who's affected by the changes to public charge policy;
- Timely updates on implementation; and
- Information on legal assistance hotlines and legal service providers in the community.

Making information readily available and accessible for families. State and local early childhood agencies should have information about public charge available in locations where families apply for or receive services. Early childhood providers can include information about public charge in their lobbies or waiting areas, on a resource table, in information packets sent home to parents, or through other regular communication channels.

Collaborating as part of multidisciplinary work groups. Early childhood agencies and programs should be part of state and local working groups that are tasked with documenting the impact of the public charge regulation; exploring options to address food, housing, and health care needs through state and local funding sources; and disseminating information to community members.

Reviewing internal policies and practices for consistency with existing privacy laws; revising internal processes as needed; and sharing guidance for programs and families. State and local agencies and early childhood programs should review applications and enrollment systems, reporting systems, and guidance for eligibility and enrollment workers and make necessary corrections. Agencies and programs should also ensure that families' private information is recorded and stored in compliance with state and federal laws and that families have ready access to easy-to-understand information about existing confidentiality protections—both for early childhood programs and for other benefit programs—in multiple languages.

Agencies may also consider strategies to make their application and enrollment processes friendly to immigrant families. For instance, they should be flexible about how household members prove their income, including through a letter from an employer, self-attestation, or other means if needed.

Programs may also evaluate their application and enrollment procedures to determine whether such materials ask for information (like Social Security numbers or citizenship status) or documentation (like birth certificates) that aren't necessary for enrolling a child or family in the program. Asking for this information—even if it's optional—may deter families from enrolling.

- **If you ask these questions to assess families' eligibility for other programs:** consider collecting this information separately from the application and enrollment process. Sequencing these processes can give the family time to get to know your program and see you as a trusted resource before being asked to share private information.
- **If you need to collect this kind of sensitive information to determine a child's or family's eligibility for your services—or if you don't have the option to revise your**

application or enrollment materials for other reasons: consider having a staff member walk parents through the forms step by step. The staff member should explain why the information is being collected, how you will use it, and the protocols you follow to protect families' privacy.

Monitoring state- and local-level data for drops in enrollment. Early childhood programs (like child care assistance, Head Start, home visiting, and state-funded preschool or pre-k) and other programs families with young children rely on (like CHIP and WIC) are **not** directly affected by changes to public charge policy. However, we expect the chilling effect to extend to programs and services that are not named in the regulation—particularly in light of the broader immigration policy context. State and local agencies, advocates, and researchers should monitor program data to identify unexpected changes in enrollment to document the broader impact of the new regulation and other policy changes on families and communities.

17. How can I stay up to date on public charge and efforts to fight back?

CLASP and the National Immigration Law Center (NILC) co-lead the *Protecting Immigrant Families* (PIF) campaign, which includes more than 400 organizations from around the country that are still fighting back against threats to immigrants' access to health care, nutrition, and other vital programs. The PIF campaign is continuously publishing and sharing new resources and advocacy opportunities related to public charge at www.protectingimmigrantfamilies.org.

You can stay up to date on news, developments, and other threats that impact immigrant families by joining the PIF email list at <http://bit.ly/PIFCampaign>. You can also join the hundreds of organizations working to protect immigrant families and advance our shared vision for a just future as a PIF **Active Member Organization**. There are no fees or work requirements to join as an Active Member, and you can participate in one of our many working groups and subcommittees. Go to <http://bit.ly/PIFActivemember> and join today!

Get in touch with CLASP

Have a question we didn't answer here? We are here to help.

Contact: Rebecca Ullrich (rullrich@clasp.org)

Related resources

Public charge

Stay up to date on public charge and find resources from CLASP, NILC, and other PIF partners at the *Protecting Immigrant Families* campaign website: <https://protectingimmigrantfamilies.org/>.

Eligibility policies

Immigrant Eligibility for Federal Child Care and Early Education Programs (CLASP, 2017). This fact sheet details immigrant eligibility for early childhood programs, specifically child care subsidies and Head Start, as they exist under current law and guidance. Available at <https://www.clasp.org/publications/fact-sheet/immigrant-eligibility-federal-child-care-and-early-education-programs>.

A Quick Guide to Immigrant Eligibility for Affordable Care Act and Key Federal Means-Tested Programs (NILC, 2018). Table includes eligibility information for ACA, SNAP, Medicaid, CHIP, TANF, and SSI. It also provides general eligibility information for various categories of noncitizen immigrants. Available at <https://www.nilc.org/issues/economic-support/quick-guide-aca-means-tested-programs/>.

Medical Assistance Programs for Immigrants in Various States (NILC, 2018). This table describes state policies for providing health coverage to lawfully residing children and pregnant women, regardless of their date of entry into the United States, or to provide prenatal care to women regardless of status, using CHIP funds. It also describes immigrant coverage under programs using exclusively state funds. Available at <https://www.nilc.org/wp-content/uploads/2015/11/med-services-for-imms-in-states.pdf>.

Privacy protections

Privacy Protections in Selected Federal Benefits Programs (NILC, 2018). Provides an overview of existing privacy protections in Medicaid, CHIP, ACA marketplace, SNAP, WIC, school lunch, TANF, CCDBG, Head Start, and TANF-funded child care. Available at <https://www.nilc.org/issues/economic-support/privacy-protections-in-selected-federal-benefits-programs/>.

Sensitive locations and safe spaces

A Guide to Creating Safe Space Policies for Early Childhood Programs (CLASP, 2019). This publication explains federal agency guidance related to “sensitive locations,” provides information about designing and implementing “safe space” policies to safeguard programs from immigration enforcement, and includes sample policy text that early childhood providers can adapt for their programs. Available at www.clasp.org/safespaceguide.

Endnotes

¹ Migration Policy Institute Data Hub, "Children in U.S. Immigrant Families,"

<https://www.migrationpolicy.org/programs/data-hub/charts/children-immigrant-families>.

² Wendy Cervantes, Rebecca Ullrich, and Hannah Matthews, *Our Children's Fear: Immigration Policy's Effects on Young Children*, CLASP, 2018, www.clasp.org/ourchildrensfear.

³ Manatt, "Public Charge Rule – Potentially Chilled Population Data Dashboard," 2018,

<https://www.manatt.com/Insights/Articles/2018/Public-Charge-Rule-Potentially-Chilled-Population>.