



December 10, 2018

Ms. Samantha Deshommes  
Office of Policy & Strategy, U.S. Citizenship & Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW  
Washington, D.C. 20526-2140  
Via [www.regulations.gov](http://www.regulations.gov)

**RE: DHS Docket No. USCIS-2010-0012**

Dear Ms. Deshommes,

The Home Care Alliance of Massachusetts (HCA of MA) - on behalf of our over 160 home care agencies serving more than 175,000 Massachusetts citizens annually- appreciates the opportunity to comment on proposed changes to the Public Charge Policy as this issue is critical to the direct-care workforce that our member-agencies employ.

Massachusetts is home to one of the fastest-aging populations in the country. By 2030, it is estimated that 1 out of every 5 Massachusetts residents will be age 65 or older. With these demographic changes occurring, home care jobs are at the top of the list in terms of fastest growing occupations nationally with nearly 1 million home care job openings between now and 2026. Unfortunately, stagnant government reimbursement rates and increased costs for long-term care services has led to a significant portion of this workforce below the national poverty threshold and many reports estimate that this workforce is upwards of 50 percent foreign-born.

While many of the challenges with respect to a national plan to care for our aging population fall outside of the purview of the Department of Homeland Security, the unique characteristics of the home care workforce outlined above put the issue of public charge at the forefront.

The Massachusetts Office of Elder Affairs reports that the rate of workers leaving the direct care workforce is outpacing the rate of those entering it. This is leading to home care organizations struggling to find workers to meet the increasing demand. Any new challenges in recruiting workers into this field will continue to impact our ability to provide essential services to those who need them.

The proposed changes under this docket will inevitably deter this workforce from seeking essential supports such as eligibility in the Massachusetts Medicaid program, SNAP and federal subsidized housing in order to avoid a public charge determination. Such benefits provide support for these

workers and allows them to participate in this growing workforce while they await their immigration cases.

Thus, the Home Care Alliance of Massachusetts respectfully opposes and asks that the Department reconsider these proposed changes to the public charge determination process as it will have grave impacts on not only this workforce, but the people we care for.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia M. Kelleher". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Patricia M. Kelleher  
Executive Director