

Docket ID USCIS-2025-0304

December 19, 2025

For nearly 100 years, and with nearly 50,000 members, including early childhood educators, faculty members, students, advocates, and allies across the country, the National Association for the Education of Young Children's (NAEYC) mission has been to increase access to high-quality, developmentally-appropriate early childhood education for all children birth through age 8. We advance a diverse, dynamic early childhood profession and support all who care for, educate, and work on behalf of young children.

Aligned with our values to promote high-quality early learning for each and every child, we are providing feedback to the Department of Homeland Security's (DHS) proposal on Public Charge Ground of Inadmissibility Regulations. We urge DHS to withdraw this proposal given its potentially harmful impacts on children, families, and early childhood educators.

This proposed rule would remove current clarity around the types of public benefit programs that will determine whether an immigrant is a public charge and potentially count against families in "green card" decisions. This could discourage some families and educators from utilizing safety net and public benefit programs, even when their children and family members are U.S. citizens and fully eligible. Removing existing guidance that clearly defines which programs are considered in "green card" determinations would open the door for more subjective decision-making by immigration officials, creating confusion and inconsistency for families. Placing additional barriers to essential nutrition, health, housing, and education services would harm the wellbeing of children in immigrant families, who make up [one quarter of children ages birth through five](#) and 86% of whom are U.S. citizens.

The anticipated harms for young children are further compounded by the potential threats to the early childhood education workforce supporting them. Of the 2.2 million early childhood educators providing essential care and education to our nation's youngest, [21 percent are immigrants](#). Due to chronically low wages and limited access to employer-based benefits, nearly 43 percent of all educators depend on public safety net programs to meet the basic needs of their own families. At a time when [teacher recruitment and retention](#) is a top concern for child care programs and the supply of quality child care for families is chronically insufficient, this proposal threatens to further undermine the stability of the early childhood education workforce, driving more educators out of the field and leaving families scrambling to find quality, affordable child care.

The rollback of existing clarity of what constitutes a public charge also threatens children's ability to thrive in early childhood education settings by deepening the challenges children in immigrant families face. If families avoid essential nutrition and health services out of fear for their immigration status, young children (including those who are U.S. citizens in mixed status households) will be placed at greater risk of hunger, instability, and developmental challenges, increasing the stressors children carry into their early care and education environments. In addition to anticipated chilling effects on program attendance as a result of confusion, creating a burden to child care programs' financial stability, these stressors risk making it more difficult for educators to



---

support quality education in program environments, risking further staff burnout and turnover and increased destabilization in the ECE field.

The anticipated impacts on children's access to early education as a result of this proposed rule are especially concerning given the more than 20 years of [research](#) pointing to quality early learning as the most effective tool to improve children's outcomes over their lifespan. From improving future education, employment, and health outcomes to developing important life skills like emotional regulation and collaboration, a strong start for children benefits society at large. With the barriers created by this proposed rule, children's opportunity to thrive and reap these lifelong benefits could be undermined. By disrupting the early childhood education field and programs, this proposed rule also risks impacting families' access to quality early childhood education beyond those directly impacted. Rather than placing additional barriers, administrative policies should support early childhood educators and the children they serve by expanding access to high quality early care and education for all children and improving compensation and work conditions for educators.

We urge the Department to use its regulatory authority to withdraw this proposed rule and maintain existing clarity around standards that define public charge.

Thank you for taking the time to solicit public feedback on this notice.