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Submitted Electronically

August 13, 2025

U.S. Department of Health and Human Services
Attn: Sean R. Keveney
Acting General Counsel
Office of the General Counsel
United States Department of Health and Human Services
200 Independence Avenue SW
Washington, D.C. 20201

Re: Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); Interpretation of ''Federal Public Benefit''
RIN 0991-ZA57

Dear Mr. Keveney,

On behalf of the United States Conference of Catholic Bishops (USCCB), we respectfully submit the following comment on the Department of Health and Human Services' revised interpretation of "federal public benefit" as under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA).[1]

The USCCB appreciates the opportunity to articulate our views on the Department's revised interpretation. The Conference shares the Department's desire to ensure that unlawful immigration is not inadvertently incentivized by the provision of federal benefits intended to assist the most vulnerable and sustain local communities. Our concerns with the revised interpretation stem from the Catholic Church's fundamental commitments to upholding the God-given dignity of every person, promoting the well-being of families, and furthering the common good. Inherent in each of these priorities is the recognition that immigrants—regardless of legal status—possess a dignity equal to that of citizens.

The USCCB strongly urges the Department to reconsider implementing this revised interpretation of PRWORA for four reasons: (1) the notice-and-comment period is insufficient to allow meaningful input; (2) it creates, rather than avoids, serious constitutional and statutory interpretation conflicts; (3) it causes predictable harm to vulnerable populations, such as mixed-status families; and (4) it implies that charitable nonprofits must comply with PRWORA's verification framework despite Congress's explicit exemption. Additionally, USCCB affirms the comments made by Catholic Charities USA and the Catholic Health Association to this Notice.

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[1] HHS Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); Interpretation of "Federal Public Benefit," 90 FR 31,232 (July 14, 2025) [hereinafter Revised Interpretation].

Background

In 1996, Congress enacted the PRWORA, which established that Federal public benefits, as defined under the Act, are available to "qualified noncitizens" ("QNC"),[2] subject to some exceptions. Absent an exception, entities administering Federal public benefits must ask and verify a recipient's immigration status with the Department of Homeland Security (DHS). PRWORA was enacted to promote self-sufficiency, ensure noncitizens rely on private resources, and disincentivize any immigration related to the availability of public benefits.[3]

The Church teaches that every person possesses inherent, God-given dignity that demands the protection of their basic rights. Access to healthcare and social welfare services must be available to all.[4] As Pope John XXIII affirmed in *Pacem in Terris*, "Man has the right to live. He has the right to bodily integrity and to the means necessary for the proper development of life, particularly food, clothing, shelter, medical care, rest, and, finally, the necessary social services."[5] Those who are poor and vulnerable must be given priority. "The principle of the universal destination of goods requires that the poor, the marginalized and in all cases those whose living conditions interfere with their proper growth should be the focus of particular concern."[6] The bishops remain committed to accompanying those who struggle, helping meet their basic needs, supporting their movement toward self-sufficiency, and fostering their ability to thrive. The federal government shares this responsibility and must not abdicate its role in promoting the common good.[7]

Grounded in Sacred Scripture,[8] the Church's social doctrine affirms that immigrant families "have the right to the same protection as that accorded other families."[9] The demands of the common good require providing certain "essential services to all, some of which are at the same time human rights: food, housing, work, education and access to culture, transportation, basic health care, the freedom of communication and expression, and

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[2] Although the statutory terms are not coextensive, we use "alien" and "noncitizen" as rough equivalents. *United States v. Hansen*, 599 U.S. 762, 770 n.1 (2023); *see also Wilkinson v. Garland*, 601 U.S. 209 (2024); *Santos-Zacaria v. Garland*, 598 U.S. 411, 414 n.1 (2023); *Nasrallah v. Barr*, 590 U.S. 573, 578FN2 (2020); *Barton v. Barr*, 590 U.S. 222, 226 n.2 (2020).
[3] 8 U.S.C. § 1601.
[4] *Catechism of the Catholic Church* §2288 (2d ed. 1997).
[5] *Pacem in Terris*, Encyclical of Pope John XXIII (Vatican, Apr. 11, 1963), in *Acta Apostolicae Sedis*, vol. 55 (1963), at §11.
[6] *Compendium of the Social Doctrine of the Church,* Pontifical Council for Justice and Peace (Vatican City, Apr. 2, 2004) at §182, available online: https://tinyurl.com/bdfbw4bs
[7] *Id.* at §168; *A Place at the Table: A Catholic Recommitment to Overcome Poverty and to Respect the Dignity of All God's Children,* USCCB (Nov. 13, 2002), available online: https://tinyurl.com/4vkf8kb7
[8] *See, e.g.*, *Lev*. 19:33–34 ("When an alien resides with you in your land, do not mistreat such a one. You shall treat the alien who resides with you no differently than the natives born among you; you shall love the alien as yourself; for you too were once aliens in the land of Egypt.").
[9] *Charter of the Rights of the Family*, Pontifical Council for the Family (Vatican City, Oct. 22, 1983), at §12, available online: https://tinyurl.com/5djumkn4

the protection of religious freedom."[10] The Church acknowledges the challenge of uniting "the welcome due to every human being, especially when in need, with a reckoning of what is necessary for both the local inhabitants and the new arrivals to live a dignified and peaceful life."[11] This balance must be guided by solidarity, justice, and mercy, with due recognition of the profound contributions immigrants—including the vast majority of those who lack legal authorization—make to our society.

Argument

In the July 2025 Notice, HHS proffers a revised interpretation of Federal public benefits under the PRWORA, specifically new statutory interpretations of key terms "any grant," "eligibility unit," "any other similar benefit," and exemptions. The USCCB is concerned that HHS did not provide the best interpretation of the statute, as required by *Loper Bright*, but instead issued this reinterpretation that restricts access to public benefits without careful consideration of all who are affected. In doing so, HHS commits several errors of statutory interpretation that render this reinterpretation arbitrary and capricious.

For the reasons explained below, the USCCB respectfully requests HHS rescind the July 14 implementation of the revised interpretation and reissue its reinterpretation after an expanded notice-and-comment period and a reconsideration of certain provisions, including reliance interests.

I. Given the far-reaching effects of the Notice, we urge the Department to rescind its implementation and provide a full 90-day comment period.

Because the Notice's effects are sweeping, difficult to forecast, and potentially irreversible, pre-promulgation notice and comment is not optional, it is a statutory prerequisite. The Department's 30-day post-implementation window is inadequate, and absent a substantiated good-cause finding, unlawful under the APA. *See* 5 U.S.C. § 553(b)–(d). Post hoc commenting does not cure the defect: it denies stakeholders the opportunity to shape the rule before it binds them and undermines the Department's obligation to weigh reliance interests and less burdensome alternatives. The Department should rescind the interim order and provide a meaningful pre-implementation comment period of no fewer than 90 days so that affected parties can assess the Notice's nationwide impacts and submit fully developed comments. Failure to do so renders the action arbitrary and capricious and exposes it to vacatur and remand.

HHS has failed to establish good cause for bypassing the notice-and-comment requirements. While the Notice invokes the President's declaration of a national emergency at the Southern Border as justification for immediate implementation,[12] the prior

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[10] *Compendium of the Social Doctrine of the Church*, *supra* note 5, §166.
[11] *Dialogue between Cultures for a Civilization of Love and Peace: Message for the Celebration of the 34th World Day of Peace*, Pope John Paul II (Vatican City, Dec. 8, 2000), at §13 available online: https://tinyurl.com/muhxazev
[12] *Chamber of Commerce of United States v. United States Dep't of Homeland Sec.*, 504 F. Supp. 3d 1077. 1087-88 (N.D. Cal. 2020) ("Good cause cannot arise as a result of the agency's own delay[.] Although both

interpretation has remained unchanged since well before that declaration. Mere citation to the President's declaration is insufficient; the Department must present a concrete factual record to support its reliance on the good-cause exemption.[13] Conclusory claims of an emergency, coupled with generalized references to delays in addressing deficiencies in the 1998 Notice, and compounded by HHS's disregard for reliance interests, the rule's impact on the broader population, and the absence of independent supporting facts, do not satisfy the APA's narrow good-cause standard.[14]

Now and going forward, the USCCB urges the Department to provide reasonable pre-implementation comment periods for regulatory actions with substantial implications for human life and dignity, including access to public benefits. The Department should avoid resorting to interim final rules or similar mechanisms except where clearly justified and supported by evidence.[15]

II. HHS's "plain reading" reinterpretation fails the whole-text rule, triggers serious federalism problems, misapplies statutory canons, ignores congressional limits, creates conflict with other federal agency definitions, and contains evidence of impermissible purpose.

The Department's new construction of 8 U.S.C. § 1611(c) stretches the phrase "any grant" beyond its textual and structural context. Read in light of the accompanying terms—"contract, loan, professional license, or commercial license"—and the surrounding provisions of PRWORA, "grant" cannot reasonably be expanded to sweep in intergovernmental block grants. The whole-text canon, *noscitur a sociis*, and the presumption against surplusage foreclose HHS's reading. Furthermore, because HHS's approach also destabilizes the

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agencies cited to 'skyrocketing' and 'widespread' unemployment rates as a basis to find 'immediate' action was necessary, they did not do so for over six months. Similar delays have precluded reliance on the good cause exception.).

[13] *National TPS Alliance v. Noem*, 25-CV-05687-TLT, 2025 WL 2233985, at *12 (N.D. Cal. July 31, 2025) (temporarily setting aside the Department of Homeland Security preordained decisions and deviation from TPS prior practice and history that mainly relied on President's Executive Orders rather than on objective fact finding.).

[14] *cf. Chamber of Commerce*, 504 F. Supp. 3d 1077 (N.D. Cal. 2020) (setting aside two rules for failure to show good cause to do away with comments, even though the rules attempt to establish a factual record of over 10 pages as to why this is an emergency) *with* Revised Interpretation, *supra* note 1, 90 FR at 31238 (conclusory stating that comments are not warranted because of the Presidential Proclamation issued in January 2025, and otherwise failing to discuss good cause.); *see also Nat'l Venture Capital Ass'n v. Duke*, 291 F. Supp. 3d 5 (D.D.C. 2017) (explaining that courts reviews an agency's finding of good cause de novo, and must examine closely the agency's explanation as outlined in the rule; because notice and comment is the default, the onus is on the agency to establish that notice and comment should not be given.).

[15] Mark Seidenfeld, *Rethinking the Good Cause Exception to Notice-&-Comment Rulemaking in Light of Interim Final Rules*, 75 ADMIN. L. REV. 787, 828–29 (2023) ("Because an IFR may be an imperfect substitute for a [Notice of Proposed Rule Making (NOPR)], it may be appropriate for a court to limit interim final rulemaking to those situations where it is a good substitute, as well as to reverse an agency ["final final rule" (FFR)] that bears the vestiges of the use of the imperfect IFR. Some courts have rejected any FFR that results from an IFR that the court finds procedurally invalid. Others have categorically affirmed the use of the IFR to start the FFR rulemaking. Still, others have focused on the likelihood that the use of the IFR to commence the FFR rulemaking altered the FFR from the rule that the agency would have adopted had it issued a NOPR rather than issuing an IFR.").

statute's federalism-sensitive balance, the constitutional-avoidance and clear-statement rules independently require rejecting it.

a. The reinterpretation collapses PRWORA's carefully constructed scheme.

As noted above, section 1611(c)(1) lists "grant" alongside instruments that are paradigmatically individual- or firm-facing. Under the canons, "grant" takes its meaning from its company; it does not silently convert PRWORA into a regulation of intergovernmental fiscal transfers. Reading "grant" to include block grants to States does precisely that, wrenching the term from its proper textual home.

Congress deliberately separated block-grant programs into "Specified Federal Programs" ("SFPs") and "Designated Federal program" ("DFPs"). *See* 8 U.S.C. § 1612(a)(3), (b)(3). At the same time, section 1611(a) provides that QNCs may receive "any Federal public benefit," while preserving targeted exclusions from SFPs and DFPs and carving out explicit exceptions (including categories such as American Indians born in Canada). *See* 8 U.S.C § 1612(a)(2)(G), (b)(2)(E). This architecture reflects a conscious severing of "federal public benefit" from block-grant programs, with selective limits Congress itself specified. HHS's reading, which treats "any grant" as embracing block grants, collapses that careful design, rendering Congress's SFP/DFP lines and exceptions superfluous. Statutes should not be construed to make whole sections not work.

b. The reinterpretation runs afoul of federalism canons and anti-commandeering limits.

When an agency construes a statute to alter the federal-state balance, the Supreme Court requires an unmistakably clear statement from Congress.[16] Nothing in section 1611 supplies that clarity. At a minimum, the federalism canon requires reading "grant" narrowly to avoid converting PRWORA into a vehicle for controlling state and local administration of block-grant funds.

The Constitution forbids Congress from issuing direct orders to States or conscripting them as federal instruments.[17] Through the Spending Clause, conditions on federal funds must be unambiguous and non-coercive.[18] By redefining "any grant" to reach block grants that States cannot practically refuse, HHS's approach risks precisely the sort of coercion and commandeering these cases prohibit. It would pressure States to police immigration status as a condition of administering broad social-service programs without the unambiguous congressional authorization the Constitution demands.

c. "Eligibility unit" should be construed to protect mixed-status families while honoring the program's design.

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[16] *Bond v. United States*, 572 U.S. 844, 858 (2014); *Gregory v. Ashcroft*, 501 U.S. 452, 460 (1991).
[17] *Murphy v. Nat'l Collegiate Athletic Ass'n*, 584 U.S. 453, 470-72 (2018), *Pennhurst State Sch. & Hosp. v. Halderman*, 451 U.S. 1, 16–17 (1981).
[18] *NFIB v. Sebelius*, 567 U.S. 519, 581 (2012).

The Department's revised understanding of "eligibility unit" is textually plausible, as was the previous interpretation. But the Spending Clause framework and program-specific designs counsel restraint. Many means-tested programs evaluate household income while directing the actual benefit to a single eligible recipient (often a U.S.-born child).

The Department should cabin PRWORA to the beneficiary level and treat background eligibility factors (e.g., household size and income) as inputs, not as PRWORA-triggering "benefits" to the whole household. It should also avoid household-wide disqualification where benefits flow to less than the full family (e.g., to a mother and child but not both parents) and construe "individual, household, or family eligibility unit" to treat the benefit as individual-level and outside PRWORA's restrictions.

This beneficiary-focused construction aligns with the statute's text, hews to the clear-statement rule, and avoids unnecessary harm to mixed-status families, while preserving the Department's ability to enforce PRWORA where Congress unmistakably directed.

d. The Department's interpretation of "any other similar benefit" misapplies statutory canons, ignores clear congressional limits, and is arbitrary and capricious.

HHS's treatment of "any other similar benefit" is flawed at the threshold because the Department has not performed the interpretive work the statute requires. Under *Loper Bright*, an agency may not simply adopt a reasonable interpretation; it must adopt the best interpretation.[19] Here, that means construing "any other similar benefit" in light of the plain meaning of the enumerated terms. "Welfare" has a well-established plain meaning, but HHS disregards that meaning in favor of cherry-picked, non-standard definitions that serve a predetermined conclusion: that Head Start is similar to welfare.

i. HHS misclassifies Head Start.

Congress's prohibition on educational benefits in PRWORA is limited to "postsecondary education." Head Start is not postsecondary education and is not welfare as Congress understood it at the time of the law's passage. HHS nonetheless attempts to classify Head Start as a federal public benefit by digging into tangential program functions rather than its primary purpose, which is plainly educational.

HHS purports to apply *ejusdem generis* but misuses it. Under that canon, general words that follow an enumerated class are understood to have a meaning consistent with the general nature of the class. Here, "any other similar benefit" must be defined in relation to "welfare" as used in PRWORA. HHS does not define "welfare," even though PRWORA does not define the term and the Department defines other terms in the same section. Instead,

[19] *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369, 400 (2024) ("In an agency case as in any other, though, even if some judges might (or might not) consider the statute ambiguous, there is a best reading all the same—"the reading the court would have reached" if no agency were involved. It therefore makes no sense to speak of a "permissible" interpretation that is not the one the court, after applying all relevant interpretive tools, concludes is best. In the business of statutory interpretation, if it is not the best, it is not permissible.").

HHS borrows definitions from unrelated statutes, promulgated at different times and addressing different subject matter, apparently relying on the canon of *in pari materia*, where the statutes are not truly *in pari materia*. PRWORA regulates noncitizen eligibility, not welfare policy generally.

The appropriate interpretive starting point is the plain meaning of "welfare" in 1996, as reflected in contemporaneous legal sources. Black's Law Dictionary defined "welfare" as "[a] system of social insurance providing assistance to those who are financially in need, as by providing food stamps and family allowances."[20] Head Start is neither a social insurance nor a family allowance program. It therefore cannot be classified as "any other similar benefit" in relation to "welfare."

e. The revised interpretation conflicts with the U.S. Department of Education's definition.

Congress, mindful of *Plyler v. Doe*, excluded only postsecondary education from PRWORA's educational-benefit restrictions. The U.S. Department of Education has concluded that "federal public benefits" do not include basic public education benefits for children, explicitly shielding such programs from PRWORA.[21] Head Start's purpose—to prepare children for school and life by fostering growth in language, literacy, mathematics, science, social and emotional functioning, creative arts, physical skills, and approaches to learning—falls squarely within basic education. HHS itself concedes this point.[22] Yet HHS sidesteps this and reclassifies Head Start as "welfare," relying on circumstantial evidence from unrelated programs and ignoring USDE's contrary reasoning.

f. The reinterpretation contains evidence of impermissible purpose.

The Department's stated rationale—to "ensure enrollment in Head Start is reserved for **American citizens** from now on"—reveals impermissible discriminatory intent.[23] Congress explicitly allowed QNCs to access Head Start regardless of any other limitation in 8 U.S.C. § 1613(a), and HHS cannot override that policy choice.[24]

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Because Head Start is neither welfare nor postsecondary education, because Congress's text and structure exclude it, and because the reinterpretation is tainted by discriminatory purpose, HHS's inclusion of Head Start as a "similar benefit" is arbitrary and capricious. The Department should withdraw this classification.

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[20] *Welfare*, BLACK'S LAW DICTIONARY (7th ed. 1999); *compare with Welfare*, BLACK'S LAW DICTIONARY (6th ed. 1990) ("Well-doing or well-being in any respect; the enjoyment of health and common blessings of life; exemption from any evil or calamity; prosperity; happiness.").
[21] USDE Clarification of Federal Public Benefits Under the Personal Responsibility and Work Opportunity Reconciliation Act, 90 FR 30,896 at 30,899 (July 11, 2025).
[22] Revised Interpretation, *supra* note 1, at 31,236.
[23] HHS Bans Illegal Aliens from Accessing its Taxpayer-Funded Programs (July 10, 2025). available online: https://tinyurl.com/2b3bh6ku (emphasis added).
[24] *See* 8 U.S.C § 1613(c)(2)(J).

III. The reinterpretation fails to consider reliance interests created by the prior interpretation.

The Department's reinterpretation fails for a threshold reason: it ignores decades of reliance interests created by the prior, settled interpretation. When an agency changes course, it must "assess whether there were reliance interests, determine whether they were significant, and weigh any such interests against competing policy concerns."[25] The Supreme Court has vacated agency actions for disregarding reliance interests far less substantial than those at stake here. [26] Under *Loper Bright*, the Department is now held to the "best reading" of the statute, and that reading must be implemented in a manner consistent with the APA's reasoned-decision-making requirements.[27]

For more than two decades, the prior interpretation governed the terms under which States, localities, and charitable organizations accepted and administered billions of dollars in federal funding for programs serving the poor and marginalized. It shaped operational structures, eligibility criteria, and contractual arrangements across virtually every major social-service program. Yet the Department's Notice offers only vague platitudes about policy tradeoffs and does not grapple with the concrete disruptions its reversal will impose. No accounting is made of the burdens on sovereign States or the destabilization of program delivery networks. Similarly, the Notice makes no effort to consider the possible impacts on U.S. citizens, however inadvertent, given the practical implications associated with implementing the reinterpretation across various programs and stakeholders. Had the Department meaningfully considered these reliance interests, it would have extended the comment period, delayed the effective date by a year or more, and allowed recipients to plan for compliance. Because the Department failed to confront these settled expectations when it acted, its reinterpretation is arbitrary and capricious. The proper remedy is vacatur and reissuance through a new notice of proposed rulemaking that addresses the substantial reliance interests its about-face will upend.[28]

IV. The new interpretation impermissibly pushes for charitable nonprofit organizations to verify status eligibility when providing certain federal public benefits.

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[25] *Dep't of Homeland Sec. v. Regents of the Univ. of California*, 591 U.S. 1, 30 (2020).
[26] *Nat'l Ass'n for the Advancement of Colored People v. Trump*, 298 F. Supp. 3d 209, 240 (D.D.C. 2018), adhered to on denial of reconsideration, 315 F. Supp. 3d 457 (D.D.C. 2018), and aff'd and remanded sub nom; *Regents*, 591 U.S. at 30 (quoting, *e.g., Encino Motorcars, LLC v. Navarro*, 136 S.Ct. 2117, 2126 (2016) which set aside the Department of Labor's interpretation of a statutory exemption from the Fair Labor Standards Act's overtime-pay requirements, in part because the agency had failed to address "decades of industry reliance" on its prior view that the exemption applied to a particular class of employees.).
[27] *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369, 410–11 (2024) ("Rather than safeguarding reliance interests, Chevron affirmatively destroys them. [S]tatutory ambiguity, as we have explained, is not a reliable indicator of actual delegation of discretionary authority to agencies. Chevron thus allows agencies to change course even when Congress has given them no power to do so. By its sheer breadth, Chevron fosters unwarranted instability in the law, leaving those attempting to plan around agency action in an eternal fog of uncertainty.").
[28] *Regents*, 591 U.S. at 21, 22.; *see also Biden v. Texas*, 597 U.S. 785, 807–14 (2022).

PRWORA provides that "a nonprofit charitable organization [...] is not required under this chapter to determine, verify, or otherwise require proof of eligibility of any applicant." 8 U.S.C. § 1642(d). HHS does not purport to formally circumscribe this exemption but nonetheless identifies "important considerations for stakeholders to keep in mind." Those considerations consist largely of a list of policy priorities articulated by President Trump via two Executive Orders, which HHS characterizes as "the will of the American people." This warrants several observations.

First, in the context of an agency's interpretation of a statute, the relevant expression of the will of the American people is that statute, a law passed by the people's representatives in Congress. In this case, the people's elected representatives chose to establish an unqualified exemption for nonprofit charities from PRWORA's eligibility verification requirement. That is where the analysis should end.

Second, HHS cites the administration's priority of "defend[ing] against the waste of hard-earned taxpayer resources." It is unclear if HHS intends to imply that it is wasteful to provide social services based on need rather than citizenship or immigration status, but if so, the USCCB roundly rejects such an impoverished view of the government's moral responsibilities.

Last, HHS states that "[e]ven if PRWORA and related regulatory activity do not mandate an entity to conduct verification of the immigration status of a person applying for benefits, nothing in the statute prohibits such an entity from conducting verification." This is so unremarkably true that, coming as it does after a litany of hostilities to the idea of immigrants receiving benefits, it is difficult to understand it as anything but a threat. Why else would "stakeholders" need to "keep" these policy priorities of the administration "in mind"? In the interests of "uphold[ing] the rule of law,"[29] HHS should speak plainly here. If HHS intends to retaliate against nonprofit charities that do not voluntarily verify eligibility, it should say so and explain its legal authority; if it does not so intend, it should rescind and disavow this transparent attempt to regulate via the bully pulpit.

Conclusion

For the reasons discussed above, the USCCB believes that the Notice was issued in an arbitrary and capricious manner. We urge the Department to rescind the Notice in its entirety. At a minimum, a longer public comment period is necessary, and the Department should also consider the reliance interests of States, localities, and charities if it chooses to reissue this or similar Notices. The USCCB also urges the Administration to avoid limiting lifesaving benefits, including nutrition assistance, for those at the margins of society. Federal policies should maximize access to programs that serve poor and vulnerable people in our communities and avoid placing additional burdens on people and families struggling to live in dignity.

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[29] Revised Interpretation, *supra* note 1, at 31,237.

Respectfully submitted,

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