



Parent & Caregiver Advisory Board

Statement Opposing Treasury Department's Proposed Rule to Reclassify Tax Credits as "Federal Public Benefits"

We, the Parent and Caregiver Advisory Board of the [Automatic Benefit for Children \(ABC\) Coalition](#), are strongly opposed to the [Treasury Department's proposal](#) to reclassify certain tax credits as "federal public benefits" under the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA).

As a coalition, we fight for [policies that provide all children and families with the regular financial support they need](#). It is for that reason that we advocate to expand the Child Tax Credit, which helps families with the costs of raising children and is one of the most powerful tools we have for fighting child poverty and ensuring that every child has the best possible start in life.

The Treasury Department's proposal would significantly restrict eligibility for the refundable portion of the Child Tax Credit. For families, refundable tax credits like the CTC are not abstract tax policy. They can mean groceries in the refrigerator, rent and utilities paid on time, reliable transportation, school supplies, child care, and the ability to handle an unexpected expense without falling further behind.

As parents, we know that raising children takes a village, and the well-being of children in immigrant families directly contributes to the well-being of all American children. The families who would be harmed by this rule are lawfully-present taxpayers who are abiding by the law by filing taxes and taking care of their children.

Ultimately, the vast majority of the children who will be harmed are U.S. citizens, who are being denied the financial security they need to meet their full potential—simply because of the nationality of their parents. This includes children whose parents are DACA recipients, have been granted Temporary Protective Status, or have one of a number of [other lawful statuses](#).

The harm would not stop with families who are directly excluded. Complicated eligibility rules can create fear and confusion throughout immigrant communities, causing families who remain eligible to question whether it is safe to claim benefits for which they qualify.

At the end of the day, this rule [conflicts with recent laws](#) passed by Congress, which have clearly defined eligibility for the CTC and other tax credits, and goes directly against what families actually want and need. As we state clearly in our coalition's [principles](#), all children should be eligible to receive the CTC regardless of factors such as the immigration status of their family or household members.

We urge the Department of Treasury to immediately withdraw the proposed regulations, and focus its efforts on ensuring all families who are eligible for the CTC and other refundable

credits receive them by making it easy for families to access, with limited paperwork and administrative burdens for families. As Advisory Board Member Eboni Brown noted, "Our children are watching."

Statements from Members of the Parent and Caregiver Advisory Board:

Huong Vu, mother from Massachusetts

"The everyday immigrant, when they come to this country, they're just here for a better life. But anywhere they go, the doors are shut. Rules like this make it harder to achieve. And for their children, not having access to opportunity will make them fall behind, and poverty will carry to the next generation."

Tia Simmons, mother from West Virginia

"As a mother, I cannot imagine looking at two American children and deciding that one deserves greater financial security because of the immigration status of their parents. It's unfathomable. Children do not choose where their parents were born, and they should not bear the consequences of policies they had absolutely no part in creating. If we say the Child Tax Credit is about supporting children, then we need to mean all children. If we are truly committed to investing in America's children, then our policies should treat children like children first."

Eboni Brown, mother from Georgia

"Children should not be suffering, and nobody asked for this!"

Carolyn Hill, grandmother from Pennsylvania

"These are rules being written by people who are not affected by the rules. There's enough money for everybody, but they act like there's not. This is legal robbery and it don't make sense. You have some people who struggle to read. So they'll struggle to know what to put down on the paperwork."

Joseph Yusuf, father from District of Columbia

"For those parents who can't speak up, or are afraid to, they're going to be silenced and not reap the benefits of the CTC."

Kali Daugherty, mother from Wisconsin

"Every child, regardless of immigration status, deserves to have their basic needs met with dignity, compassion, and care. Denying children those basic necessities is not only cruel, it is unacceptable."

Raegan Selden, mother from Pennsylvania

"Give me your tired, your poor... so I can make them even more tired and poor?" I don't get it.... The most powerful weapon against these changes is education. They are hoping to confuse us to the point where we don't care anymore because we're tired of hearing about it."

Lupe Mendoza, mother from Washington

"We often say it takes a village to raise a child, but that means we cannot pick and choose which children belong in that village. When children and families in our communities are able to thrive, our entire community is stronger. Families should be able to provide for their children with dignity and without fear. The Child Tax Credit should be a source of stability for families, not another system they are afraid to navigate."

About the ABC Coalition

The Automatic Benefit for Children (ABC) Coalition is a parent-led group of national, state, and grassroots organizations. Our mission is to create a child allowance that provides regular, meaningful assistance to families, promotes racial equity and justice, enjoys broad public support, and serves as a foundation for a more equitable and inclusive social support system. We see the expansion of a fully inclusive Child Tax Credit as a step toward that goal.

The Parent & Caregiver Advisory Board is composed of a group of parents from across the U.S. who are committed to building a child allowance that meets the needs of families with children.



Endorsed by the Steering Committee of the Automatic Benefit for Children (ABC) Coalition

Please contact Elisa Minoff (elisa.minoff@cssp.org) at the Center for the Study of Social Policy with any questions.