



7/2/2019

Submitted via www.regulations.gov

Office of General Counsel, Rules Docket Clerk
Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-0500

Re: HUD Docket No. FR-6124-P-01, RIN 2501-AD89 Comments in Response to Proposed Rulemaking:
Housing and Community Development Act of 1980: Verification of Eligible Status

Dear Sir/Madam:

I am writing on behalf of the California Housing Consortium (CHC) in response to the Department of Housing and Urban Development's (HUD) proposed rule to express our strong opposition to the changes regarding "verification of eligible status," published in the Federal Register on May 10, 2019 (RIN 2501-AD89; HUD Docket No. FR-6124-P-01). If implemented, the rule would result in the displacement of thousands of families across the country and disproportionately affect millions of California residents. Furthermore, contrary to the administration's claim, the proposed rule is unlikely to reduce the waiting list for assisted housing programs and instead, due to expected costs associated with its implementation, could reduce overall housing quality and assistance. **We urge the rule to be withdrawn in its entirety, and that HUD's long-standing regulations remain in effect.**

CHC is a non-partisan advocate for the production and preservation of housing affordable to low- and moderate-income Californians. We represent the development, building, financial, and public sectors united in their goal that every Californian has a safe, affordable place to call home.

Our state is in the midst of a crushing housing affordability crisis and this proposed rule does not address the underlying causes of this crisis nor expand the availability of housing units. HUD's own analysis indicates the rule would cost the government at least \$193 million more each year. As a result, HUD predicts "there could be fewer households served under the housing choice vouchers program." Additionally, for public housing complexes, there would be a negative impact on the quality of service, maintenance of units, and possible vacancies. This reduction of housing units and quality would only exacerbate the ongoing homelessness crisis in many of our communities.

Existing law already prohibits ineligible immigrants from receiving federal housing assistance. However, for over two decades, the Department has allowed mixed-status families – households whose members have different citizenship and immigration statuses – to live in subsidized housing provided at least one person is an eligible resident or citizen. By limiting federal housing assistance only to families in which every member is an eligible resident and citizen, the proposed rule could result in the displacement of 25,000 households nationwide, of whom *over 9,000 reside in California* and all are U.S. citizens or residents.

We urge HUD to immediately withdraw its current proposal, and dedicate its efforts to advancing policies that strengthen—rather than undermine—the ability of immigrants to support themselves and their families in the future. If we want our communities to thrive, everyone in those communities must

be able to stay together and get the care, services and support they need to remain healthy and productive.

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact VP of Government Affairs, Marina Wiant, at (916) 272-2325 or mwiant@calhsng.org to provide further information.

Sincerely,

A handwritten signature in black ink that reads "Ray Pearl". The signature is written in a cursive style with a large, looped "P" at the end.

Ray Pearl
Executive Director