

June 28, 2019

Secretary Ben Carson
c/o Regulations Division
Office of the General Counsel
Rules Docket Clerk
U.S. Department of Housing and Urban Development
451 7th Street, SW, Room 10276
Washington, D.C. 20410-001

Docket No. FR-6124-P-01, Housing and Community Development Act of 1980: Verification of Eligible Status

I am writing on behalf of the National Housing Conference (NHC) to offer comments on HUD's proposal to amend its regulations implementing section 214 of the Housing and Community Development Act of 1980. These proposed regulations would require the verification of the eligible immigration status of all recipients of assistance under a covered program who are under the age of 62.

NHC strongly opposes this proposed rule because it violates the basic tenets of HUD's mission and is counterproductive. The rule could lead to the eviction, and in many cases homelessness, of more than 100,000 people, including more than 55,000 children who are U.S. citizens or have legal status. While these units may be reallocated to other deserving families, the net impact on our communities and our country is overwhelmingly negative.

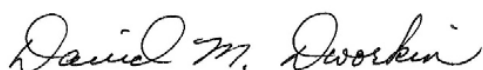
In addition, the rule would be a tremendous distraction of resources when HUD is struggling to maintain and improve conditions in its current stock of public housing and is already understaffed and underfunded. As you are aware, we face an affordable housing crisis in this country that is getting worse by the day. HUD should focus its limited resources on addressing this crisis rather than implementing this burdensome rule and evicting tens of thousands of families.

The rule may also have a chilling effect on immigrant families that will push them even further to the margins of society, adding to an already growing homeless crisis. In a country where immigrants face countless obstacles to stability and security, this rule will engender further fear and chaos among residents who have just as much of a need for safe and affordable housing as anyone else.

Finally, if HUD's motivation for this proposed rule is to allow more people to have access to federally subsidized housing, the rule is counterproductive. HUD's own analysis shows that the proposed rule will result in fewer families receiving federal housing benefits.¹ Because HUD currently subsidizes only eligible family members, the federal government will have to spend more in subsidies to house the same amount of people.

For all the above reasons, we respectfully urge you to withdraw this proposed rule. Thank you for taking our comments into consideration. Please contact me at davidmdworkin@nhc.org or (202)442-2121 x234 with any questions.

Sincerely,



David M. Dworkin
President & CEO
National Housing Conference

¹ HUD, "Regulatory Impact Analysis: Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980," April 15, 2019.