

April 15, 2026

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-6524-P-01, RIN 2501-AE16
Comments in Response to Proposed Rulemaking
Housing and Community Development Act of 1980: Verification of Eligible Status

Dear Office of General Counsel:

The Alliance of Cambridge Tenants (ACT) is writing 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 February 20, 2026 (RIN 2501-AE16; HUD Docket No. FR-6524-P-01, hereafter referred to as "proposed rule").

ACT is a tenant organization located in Cambridge, Massachusetts that advocates for the rights of low-income public housing and Section 8 vouchers tenants. We urge HUD to withdraw the rule in its entirety and to allow its long-standing regulations governing mixed status families and verification of status to remain in effect. We oppose the proposed rule because:

1. The costs of eviction and checking everyone's status are prohibitive. This new rule is not an efficient use of resources and will not solve the housing shortage problem.
2. It could cause increases in homelessness, which is bad for all of society.
3. Diversity is one of our core values as Americans. These are our neighbors and we want them to stay.

The proposed rule is an inefficient use of resources.

The new rule is expensive to implement since now every HUD subsidized tenant will need to submit documents proving their citizenship. Staff will need to spend more time and energy following up with tenants and reviewing their documents. This is not an administrable solution. Identifying and removing families with mixed-status households is time-consuming and will not be possible. The rule will not work. It will only take resources away from investments into safe, stable housing.

Additionally, immigrant families contribute millions of dollars to public housing through their rental payments. The loss of money could decimate public housing. Due to the lack of rental payments, housing authorities may not be able to rehabilitate the empty apartments and fill them with new tenants. Vacated apartments can create security issues. Instead of removing immigrant families with mixed statuses who contribute to the economy and sustainability of the housing, that money should be used to develop more housing.

Given the inefficiencies created by this new proposed rule, it is clear to us that HUD is not making efforts to actually increase housing for U.S. citizens. Instead, this rule demonstrates the administration's biases against people in publicly assisted housing. It is a rule that creates misinformation about the availability of housing and sows division. Rather than implementing this rule, it would be cheaper to provide services to public housing tenants and make housing more affordable to everyone.

The proposed rule will increase homelessness which has negative effects on society.

ACT cares deeply about all the tenants we represent. We have serious concerns about how this rule might affect children in public housing especially. Families who are no longer eligible for public housing may become homeless. This causes childhood trauma as children lose stability in their home life. It may affect their ability to attend school. The effects on their ability to learn are huge, especially if they lose access to school meals.

Families deserve to live together in stable, safe housing. Homelessness does not benefit other individuals in society. It only leads to the criminalization of families who cannot afford housing and costs the state money. Keeping people housed is important to the public's tax dollars.

The proposed rule does not take into account the value of diversity in our communities.

This is a nation founded by immigrants. The diversity in our communities is beautiful and brings richness. The people affected by this rule are our neighbors. We all learn from each other. Our children are friends. Through our interactions, we learn about coming together across differences and how to be good community members. A tenant in our organization stated that the reason their kids are taking other language classes in school is because of how much they've learned from others in the public housing development.

Immigrants make up an important part of our communities and our labor force. They are essential workers in our society. If they face housing instability, that could affect their ability to contribute positively to the community and to work. This not only impacts our communities but also our economy.

HUD's rule will have detrimental effects on the communities we value and care about. It is not a rule that will make housing more affordable and available for U.S. citizens. Rather, it wastes public resources on burdensome administrative tasks that are unnecessary. Our love for our neighbors, our tenants, and our communities demand that we speak up against this. For all of these reasons, we urge HUD to withdraw this proposed rule.

Respectfully submitted,

The Alliance of Cambridge Tenants