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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 Boston Housing Authority Youth Council is writing 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”).

As young residents of Boston’s public housing communities, we represent a generation that has grown up alongside immigrant neighbors, classmates, and friends. We see every day how stable housing allows families to work, raise their children, and contribute to the life of our neighborhoods. Because of this, we strongly oppose the proposed federal regulations that would further restrict public housing and rental assistance based on immigration status.

Our community is made richer by the presence of immigrants

Immigrants bring culture, diversity, and life to our neighborhoods. In communities like Dorchester and Jamaica Plain, the presence of Dominican, Hispanic, and other immigrant families has shaped the character of our streets through restaurants, corner stores, festivals like Cinco de Mayo, and the everyday warmth of neighbors who know each other by name. As one of our members put it: “the community is more diverse with many people from different cultures, and it makes it feel more welcoming to other people.”

We also learn from each other every day. Young people from different backgrounds (Hispanic, Asian, and others) share customs and traditions, learning from one another in ways that no classroom alone can replicate. Immigrants look out for everyone in the building, not just their own families. They participate in weekly cleanings, community gatherings, and building life. As one youth member said: “I don’t think there are any negative aspects to it at all. They look out for us just as we look out for them.”

Many immigrants also bring a deep sense of gratitude for opportunities that those of us born here may take for granted. One member shared the story of a relative who came here and considered buying a hamburger a special occasion, something that felt extraordinary when it was rare back home. That same relative’s neighbor, a woman who ran a corner store, used the income from her immigrant customers to provide free ice cream to every child at a local school. They pay it forward.

Under the proposed regulations, these families would be forced to choose between staying together and keeping their homes. HUD’s own estimates show that tens of thousands of U.S. citizen children could lose their housing. When children lose stable housing, the entire community feels the impact: schools, health centers, and local organizations all absorb the consequences.

With Fear and insecurity caused by immigration enforcement harm our entire community

Young people in our community are keenly aware of the fear that immigration enforcement has created. As one member explained: “It’s very scary for all of these things to be happening around them, and for them to not be able to feel they have security and shelter.” Instead of spending energy building their families and earning income, immigrant neighbors are forced to spend that energy simply ensuring they won’t be removed.

Importantly, this fear extends far beyond immigrants themselves. As our members noted: “you don’t have to be an immigrant, you can look like them and still be impacted.” Young students who might be targeted based on appearance are afraid to go out, afraid to pursue their education, afraid to simply live their daily lives. And when a best friend or neighbor is detained, that is a direct impact on all of us, because we are all intertwined.

We have also seen immigrants become too afraid to seek help when they need it most. One member described a friend who faced a medical emergency but refused to go to the hospital out of fear of being detained. Immigrants are increasingly reluctant to call the police even in genuine emergencies, treating law enforcement as a last resort. When people are afraid to access basic services, the safety and health of the entire community suffers.

When immigrant-owned businesses close because their owners are removed, our neighborhoods lose the diversity and vitality that made them worth living in. As one member put it: “it’s like a husk of what it was.” The damage is not just economic, it is the loss of the community itself.

Documentation barriers put families and long-time residents at risk

The proposal would require every household member to provide proof of citizenship or eligible immigration status. Our members immediately recognized how burdensome this would be in practice. A passport costs over \$170 and takes significant time to obtain. Birth certificates require missing work or school. Documents can be lost, delayed, or difficult to retrieve if you were born in another state. As one youth member observed: “it helps no one in the end, not just immigrants, but U.S. citizens as well. Someone could miss a payment trying to gather documents in time and end up on the streets regardless.”

For mixed-status families, where one or more members may lack documentation, the stakes are even higher. As one member described: “You could lose your father or your mother simply because they didn’t have the same papers you did. That’s a really scary thing to think about.”

This rule harms the entire public housing community, not just immigrants

Our members were clear: this rule is “a net negative for literally everybody.” When immigrant families are displaced, the rent burden on remaining tenants increases. Revenue that supports building operations disappears. Communities become less connected and less safe. And the jobs that immigrants fill, construction, building maintenance, agricultural work, the labor that keeps our cities running, go unfilled, because, as our members noted, many of these are jobs that others are unwilling to do.

Farms in California are already closing because there are no workers to harvest crops. Subway repairs take longer. Buildings go unmaintained. The consequences are not abstract, they are felt every day in communities like ours. As one youth member put it: “a lot of our buildings were built on the backs of immigrants. Removing these people will not only affect them, it will affect everyone.”

It is also completely unnecessary to spend valuable public resources targeting people who are paying their rent on time and not disturbing anyone. Those resources could be directed toward something far more valuable and helpful for our communities.

Massachusetts has long recognized the importance of inclusive housing

In Massachusetts, noncitizens are currently eligible for public and subsidized housing. These proposed federal changes would create confusion and fear among residents who have followed the rules and relied on consistent guidance for years. They would also overwhelm shelters and local systems that are already stretched thin, driving up homelessness rates at a moment when the private rental market is already out of reach for most families.

Why we speak

The youth members who contributed to these comments did so with pride. As one said: “I’m glad I can use my voice to vocalize it for people who are maybe too afraid or too at risk to talk.” Another added: “I’m just here to vocalize it for people that just can’t, or just don’t know enough.”

We are the generation that will inherit the communities being shaped by decisions like this one. We have grown up in diverse neighborhoods. We have immigrant friends, immigrant family members, immigrant neighbors who have shaped who we are. We understand what is at stake. And we believe, as one member said, that this rule “really makes no sense for anyone to think would be a beneficial thing to pass.”

At its core, this is a moral question about what values we hold as a society. The values written into the founding of this nation, dignity, inclusion, opportunity, are in direct contradiction with a rule like this one. How can we pass a law that harms so many people who work hard, pay their rent, and contribute every day to the communities we share?

Our position as the Boston Housing Authority Youth Council

We believe housing policy should keep families together, not separate them. It should expand access, not narrow it. And it should honor the dignity and humanity of every resident, young and old, who calls our community home.

For these reasons, the Boston Housing Authority Youth Council urges HUD to withdraw this proposal and instead focus on policies that strengthen housing stability, support mixed-status families, and build thriving, inclusive communities.

Sincerely,

Boston Housing Authority Youth Council