

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 Brockton Resident Alliance 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 the Brockton Resident Alliance, we represent the families, elders, and long-time neighbors who call our public housing community home. Every day, we see firsthand how stable housing allows families to work, raise their children, care for aging parents, and contribute to the life of our neighborhood. 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 built on mixed-status families

Brockton is home to families of many backgrounds, including mixed-status households where some members are U.S. citizens or eligible noncitizens and others are not. These families are deeply rooted here. Their children attend neighborhood schools, we worship together, and they show up at the front of every community event, asking: “What can we do?”

Immigrants in our developments contribute their cooking, their music, their art, and their culture. When we hold celebrations, from Cinco de Mayo to our community vibrancy programs, it is our immigrant neighbors who arrive in traditional cultural attire, who bring their children’s dance troupes, who make posters and decorations and remind all of us what it means to be proud of where we come from. As one of our resident leaders put it: “It makes us whole. You can’t have a civilization in a vacuum.”

In our churches, immigrants bring their cultures, their styles of worship, and their music. We learn to intertwine our traditions. We praise the same God in different ways, and we find ourselves richer for it. Immigrant children speak multiple languages and teach those languages to their American-born friends, a gift that no classroom can fully replicate.

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.

Documentation barriers put elders and long-time residents at risk

The proposal would require every household member to provide proof of citizenship or eligible immigration status, including seniors who have never been asked for these documents before. Many older residents do not have access to original paperwork, and many families have experienced trauma, displacement, or loss that makes documentation difficult to obtain. These barriers can lead to fear, confusion, and wrongful loss of housing for people who have lived in Brockton for decades.

The recertification process itself carries steep financial and administrative costs. For families already stretched thin, the money spent navigating this process is money taken away from food, rent, and transportation. These are not abstract burdens, they are choices that real families in our community will be forced to make.

The proposed rule harms the entire public housing system

This rule does not only harm immigrant families, it harms every resident of public housing.

"Mixed-income families who pay a pro-rated and higher rent currently contribute approximately \$300 million per year to operational budgets. If these families are displaced, that funding disappears. An already underfunded system will be stretched even further, and remaining residents will face higher rents and deteriorating conditions. As our members said plainly: this rule is "like shooting yourself in the foot."

Vacant units created by prolonged recertification processes give justification to raise rent scales, from 30% to 35% to 40% of income, at a time when most residents cannot afford to pay more. The logical and financial case for this rule simply does not hold up.

We have seen what happens when our government abandons immigrants

We have lived this. When Haitian families were brought to Brockton and left at a shelter on Spring Street with \$50 and nowhere to go, it was our churches, not our government, that stepped in. We provided shelter, work, and a path to legal status through community organizations. It took telephone calls, footwork, negotiation with landlords, and months of effort. It should not have to be that way.

When families are separated by enforcement and deported not to their country of origin but to wherever will accept them, with no support services, no paper trail, and no path to reunification, communities like ours pay the price. Children end up in one country, parents in another, with no clear way back to each other. We have already seen this. We do not want to see it again.

Immigrants who come here, build lives here, and in many cases enlist to serve this country deserve better than to be cast aside. As one of our veterans put it: "We all wore green. We all represented this country. There was no color."

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. We saw this firsthand with the arrival of Haitian families in Brockton, and our shelters were not adequate then, and they are not adequate now.

What motivates us to speak

Our resident leaders were raised to believe they are their brother's keeper. They were taught that if you can affect one person's life in a positive way, you have lived a good life. They step between bullies and tenants in their own buildings. They show up at other developments when they are called. They do this every single day.

They do it because every human being has a right to freedom. They do it because they have seen segregation with their own eyes, riding in the colored car on the train south, being turned away from stores, and they refuse to let history repeat itself. They do it because the Constitution, whatever its original limitations, now means everybody. We the people mean all of us.

As one member said: “If you’re telling others to go back, you might as well go back too, because your ancestors came from somewhere else as well.”

Our position as the Brockton Resident Alliance

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 who calls Brockton home.

For these reasons, the Brockton Resident Alliance 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,

Brockton Resident Alliance