

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 Charlestown 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 Charlestown 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

Charlestown 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 our schools, their parents work in our local businesses, and they participate in community events, resident councils, and neighborhood life.

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 Charlestown for decades.



Housing stability is community stability

Public housing is not just a roof — it is the foundation of safety, connection, and opportunity. When families are uprooted, trust erodes. Children fall behind in school. Parents lose access to support networks. Neighborhoods become less connected and less safe. These regulations do not create new housing or improve access; they simply remove families from the homes they already have. It's our children who pay the price.



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.



Our position as the Charlestown 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 Charlestown home.

For these reasons, the Charlestown 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,

Charlestown Resident Alliance