

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 Fairhaven Tenant Organization in Chicopee, MA 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") for these reasons:

1. This proposal will increase homelessness and destabilize communities outside public housing as well as inside.

Immigrant families form very tight bonds and will never choose to leave their children. We understand that you are banking on this fact and expect that these families will leave before they have to be evicted. They work all their lives in markets and mills often for low wages, raise their kids here, pay taxes, and now have to choose between splitting up or losing their housing?! It's not fair. Everyone deserves fair and equitable housing no matter their work. Some people haven't been able to access education or skills building programs, some are disabled or elderly. All communities are destabilized when the number of unhoused people becomes large and seemingly permanent. When people cannot connect, they don't care. Neglect grows. Animosity grows. Public Housing is an excellent example of communities that know how to care for each other and protect each other. This proposal will throw panic into people and they will begin to hide. Not because they should, but because that becomes the only way to keep their kids in school and maintain some kind of community support as a family. They will move in with their friends, who will also then be at risk of eviction for overcrowding. They will stop going to doctors, which means their mental and physical health will now be at risk. Destabilized families are a burden on communities, which are a burden on state and local agencies. It will cost more to serve a larger unhoused and overcrowded community than to simply leave these families in their homes and create more opportunities for stable housing.

2. Children will pay the biggest price.

It is estimated that this proposal will affect around 37,000 children, most of whom are citizens. These children will lose their home or lose a parent, both are significant traumas in the lives of youth. Their education will be disrupted, friendships will be lost, their confidence will be shaken. They will not be empowered to become problem solvers, because they will have been made into a problem – and they know it. We will be teaching them that we don't care, so they won't care.

That is a horrible legacy to bring into our communities. It will take years to heal these kids into adults who are able to contribute socially and economically.

3. Requiring documentation of all tenants will disproportionately affect elderly married women.

50% of our residents are from other countries. Puerto Rico, Mexico, Russia, Poland, Greece, Pakistan, Afghanistan, and China. As a part of charting their name changes, they will have to provide marriage certificates and death certificates, not just their own birth certificates. These can be very hard to find given the political turmoil of some of these countries. These citizens and eligible non-citizens will be at risk of eviction simply because their documentation is buried in international bureaucracies. That's not the point of this proposal. The weakest, the sickest, the oldest will pay with their health. They will have to balance these costs against food and rent on a fixed income. They have been accepted into public housing already and shouldn't have to incur the extra cost of finding these documents.

4. The immediate loss of hundreds of millions of dollars is an outrage, given the deep disrepair that public housing developments are already dealing with.

The choice to let go of significant and precious Housing Authority funds seems deeply irresponsible. If you are willing to lose such a huge amount, instead, take that money and develop new homes for all the "citizens" you are trying to prioritize. It's a disgrace to say there is no money to address the mold, water leaks, electrical problems, faulty fire alarms, holes in ceilings, and then further deepen the financial stress of these communities! This falls on the backs of low income, disabled and elderly CITIZENS, individuals and families. It makes no sense, unless you are *trying* to undermine public housing as a whole.

By strengthening public housing, you strengthen communities, you strengthen the tax base, and increase independence and pride. Our community at Fairhaven demands that HUD be accountable for the on-going health-threatening maintenance issues that already exist in public housing before it passes rules that threaten the lives of children, disrespects the vital labor immigrants provide this country, breaks up stable families and diverse communities, and guts the financial capacity of its own housing authorities.

Respectfully,

The Fairhaven Tenant Association
Chicopee, MA