

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 Harborview Tenant Organization in Quincy, 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"). We believe that there are enough resources in this country for everyone to have housing, we just don't prioritize it. It is just a misplaced belief that one group is taking anything away from another group. Everyone deserves housing.

These are long term, stable and invested families and communities.

It is heartbreaking to think about what this proposal could do to so many long term families here. Residents don't often leave. They stay, and their children grow up here. They are invested in this community and in each other. Rules like this will tear families from their support, children from their friends and schools, and break the social fabric that has grown so strong.

The value of truly diverse communities.

There is so much diversity here: multiple languages, religions, ethnicities, nationalities. Kids learn to be kinder, to have a collective spirit of inclusion. They learn leadership skills like inclusion and respect and curiosity towards difference. This encourages resilience and collaboration, it broadens experience, promotes instincts to protect each other and to value difference. These are invaluable skills for youth, for anyone, to build. Public housing can become these diverse and stable communities like really nowhere else.

An unacceptable and unjustifiable cost.

Hundreds of millions of dollars will be lost in administrative costs and lost rent from mixed status families. This is a huge amount of money for already struggling housing authorities to budget overwhelming maintenance issues. Why can't we just use this money to build more housing instead of pushing out families and children? Turnover costs are very high: 10-20K just to evict and rehab an apartment, especially if someone has been there for a while. And that is over and above the added administrative costs and rent loss. People will go live with friends, who then have an "illegal border" in their house. This makes the friends vulnerable to eviction as well. The losses and the costs will compound.

Ineligible is not illegal.

Mixed status families are families with one or some members who are not eligible for housing assistance. These members are not in the US "illegally." And while they live in public housing with family members who are eligible and do receive housing assistance, only the eligible members receive that assistance. So mixed status families pay more in rent, a prorated amount, and therefore provide more resources to housing authorities than other families.

The burden of documentation will be difficult.

Documentation will be required of every tenant, not just immigrants. There are already many people who fail to recertify every year, and that requires only proof of income. So many people come to this country after incredible hardship. Asking them to come up with original birth certificates, marriage certificates (for evidence of name changes), etc., especially if the person is elderly, is a significant burden in terms of time and money that is hard for non-immigrants to imagine. These people are documented, and that should stand.

Respectfully submitted,

Harborview Tenant Organization
Quincy, MA