

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
Comment in Response to Proposed Rulemaking
Housing and Community Development Act of 1980: Verification of Eligible Status

Dear Office of General Counsel:

The Jenny Lane Apts Tenant Organization, Springfield, 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 urge HUD to withdraw the rule in its entirety and to allow its long-standing regulations governing mixed status families and verification of status to remain in effect. We oppose the proposed rule because it (1) is devastating for families and children, (2) disrespects the essential labor performed by working-class immigrants every day, and (3) harms tenants with legal documentation *while worsening the lives of citizens and eligible non-citizens*.

I. This proposal is devastating for families and children.

Immigrant communities have strong family bonds. We raise our children beyond adulthood and university; we would never choose to leave them behind. This deep commitment to family is intergenerational and interconnected. While parents support their children financially through hard work and sacrifice, grandparents in Latino and immigrant homes often also contribute by cooking and providing childcare for grandchildren around the clock. In this way, grandparents, just like parents, play a vital, respected role in our children's early childhood experiences. By forcing families to choose between splitting up or being evicted, this proposal attacks the very heart of immigrant family bonds. In addition to losing their homes, these children also risk losing multiple layers of familial stability that support them as they grow up, go to school, join extracurriculars, and pursue opportunities. It is estimated that this proposal will affect around 37,000 children, most of whom are citizens. That is 37,000 children who will be forced to reckon with impossible, traumatic questions of what it means to potentially be thrown out on the street, to never live with their family again — to be left behind.

II. This proposal disrespects the essential labor performed by working-class immigrants every day.

Immigrants are a vital source of labor for American industry. We work hard at lower-paying jobs to benefit U.S. corporations in a variety of sectors: construction, farming, food distribution, home care services, education. Our grandparents are sweeping subway stations; our children are picking up shifts as soon as they are old enough. Mixed-status families are *hard-working* families who respect their obligations to this country and to their families. This proposal would render them terribly vulnerable to the competitive and expensive private housing market.

III. This proposal would come at a preposterous cost.

Meanwhile, there is no path forward to increasing public and HUD-assisted housing for citizens and eligible non-citizens under this proposed rule. Housing authorities will lose *hundreds of millions of dollars*, which will result in deplorable living conditions, understaffing, and a mass of empty units that impact all tenants, not just immigrants. These consequences will be pinned on low-income immigrants, but make no mistake: it is the government's proposed rule that is throwing an obscene amount of money towards neighborhood instability and the degradation of diverse housing developments. Despite what this proposed rule says, everyone – including immigrants with legal documentation – deserves to live in healthy, stable, and thriving communities in HUD-assisted housing.

IV. This proposal harms tenants with legal documentation

In the immigration context, the burden of providing documentation is heaviest and most costly for the elderly, as well as those on fixed incomes. Securing the kind of documentation required by this proposed rule often requires lawyers and money and computer skills, all of which are difficult for this population. We have seen the current administration talk about targeting “fraudsters.” In fact, this rule explicitly targets tenants with legal documentation for the sole purpose of fearmongering, violent detention, and deportation.

We call on HUD to withdraw this dangerous proposal and protect not just mixed status tenants, but public housing itself.

Respectfully submitted,

Jenny Lane Apts Tenant Organization
Springfield, MA