

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 Lowell Tenant Organization 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).

I. This proposal will increase homelessness and put additional strain on shelters.

Eliminating the ability of mixed-status families to receive support for housing under HUD, will increase housing insecurity. Homelessness is already a pervasive issue in our community, and shelters are already strained. People are struggling with housing affordability as is. It is unclear how much space shelters have for additional families displaced by this proposed rule. Such strains on already limited resources will have repercussions throughout our communities.

II. This proposal disrespects workers and families. It will increase crime and decrease the safety of our communities.

The proposed rule disrespects families, many of whom come here from tough situations and work hard to build a family and home. Their efforts, hard work, and taxes are undercut by this proposal. People who otherwise would be working will become unable to work. By increasing homelessness, crime and drug use will increase and streets will become less safe. Our children will disproportionately bear the burden of these changes.

III. This proposal will not make more housing available for eligible non-citizens or citizens. Housing Authorities cannot afford the costs of this proposal.

The loss of hundreds of millions of dollars in revenue, as a direct result of this proposal, will only increase disrepair, understaffing, and empty units. Housing authorities will not have the funds to rehab and refill units post-eviction even for eligible non-citizens or citizens. Throwing away significant funding when the system is struggling to maintain its assistance for those facing

housing insecurity is outrageous. As several residents shared with us: “it will be a disaster,” “how can they even think about losing that money!”

IV. This proposal will disrupt communities.

Most importantly, in addition to increasing crime, decreasing safety, and disrupting workplaces, the proposal would also deeply impact the rich fabric of our neighborhoods. Lowell is a community of all kinds of nationalities. We learn from each other, share food and culture with one another, and have built a community around human interaction and belonging. Immigrants here are already afraid, and measures such as this breeds division and distrust. This fear can destroy the goodwill and cohesion of our communities. This will affect local services, like healthcare, and will worsen mental health, drug use, and trauma.

We therefore ask for HUD to withdraw the proposed rule affecting mixed status families in public housing.

Respectfully Submitted,

Lowell Tenant Organization