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April 15, 2026

*Submitted via [www.regulations.gov](http://www.regulations.gov)*

Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> 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 Massachusetts Union of Public Housing Tenants (Mass Union) and the Massachusetts Law Reform Institute (MLRI) are writing in response to the Department of Housing and Urban Development's (HUD) proposed rule 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").

MLRI is a nationally recognized nonprofit poverty law and policy center. Our mission is to provide statewide advocacy and leadership in advancing laws, policies, and practices that secure economic, racial, and social justice for low-income people, address the root causes of poverty, and create a path to economic stability and mobility.

Mass Union is a statewide non-profit union of public housing residents, including residents who live in federally-subsidized housing programs administered by HUD. Through local tenant organizations, Mass Union's purpose is to advance the shared interests of its members and to protect thousands of individual tenants, including tenants in mixed families. As Mass Union compiled these comments, we spoke with tenants in 12 local tenant organizations representing thousands of tenants in Boston, Brockton, Cambridge, Chicopee, Fall River, Somerville, Springfield, and Quincy about how the rule would impact their communities. We include their comments.<sup>1</sup>

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. Contradicts Section 214, the authorizing statute passed by Congress in 1996
2. Uses the regulatory process to scapegoat and dehumanize immigrants, who are valued members of Mass Union communities
3. Impacts all HUD tenants and will result in diverting millions of dollars from housing
4. Will result in fear, trauma, self-eviction, and homelessness
5. Will divert needed funds for housing assistance to pay for needless red tape and evictions
6. Will result in fewer households receiving housing assistance during a national housing crisis

## **1. Proposed rule contradicts Section 214, the authorizing statute passed by Congress in 1996**

“This is not about ending poverty. This is about breaking communities - just like ICE is doing. People are already afraid to come together to support each other. They are afraid to go grocery shopping and send their kids to school. It’s just going to get worse,” a tenant told Mass Union.

In 1996, Congress passed Section 214 of the 1980 Housing and Community Development Act. For 40 years, this federal law has provided the statutory framework for families with legal immigration statuses to access federal public housing and Section 8 vouchers. It was passed during a Republican controlled Congress and prohibited HUD from providing financial assistance to non-eligible immigrant individuals.

Section 214 and the current regulations are clear:

- Only eligible immigrants receive financial assistance;
- Mixed-status families must pay a higher pro-rated rent; and
- If at least one member of the family is eligible, the family can live together.<sup>2</sup>

While HUD’s proposed rule states that it would bring “HUD’s regulations into greater alignment with the wording and purpose of Section 214.”<sup>3</sup> **It does the opposite.**

The proposed rule will result in eligible families being ousted from their homes, cause family division, and cost housing providers and HUD millions of dollars to implement. The proposed rule goes against the law that Congress passed, with no evidence that the current regulation is ineffective or fails to carry out the intent of Section 214. It will effectively repeal - by regulation - the longstanding prorated assistance law passed by Congress. Only Congress, not HUD, can re-write Section 214 and for that reason this proposed rule should not be adopted.

## 2. The proposed rule uses the regulatory process to scapegoat and dehumanize immigrants, who are valued members of Mass Union communities

“Fear of a best friend or family member being detained and evicted leaves a cloud of fear hanging over everyone,” a tenant told Mass Union.

Statistics alone cannot capture the devastation that this proposed rule is already inflicting and will inflict upon families and communities. Nationally, HUD’s proposed rule will put approximately 20,000 mixed-status families at risk of losing their home - 79,300 people, of which 65% of the eligible members are children.<sup>4</sup> In Massachusetts, there are 910 mixed-status families with upwards of 4,000 people and 1,700 children who could be expelled from their home.<sup>5</sup> Most of the children are American citizens.

By HUD’s own admission, this proposed rule is being used as a way to frighten immigrant families away from their homes and force them into dire circumstances. Mixed-status families represent a fraction - less than 0.5% - of the 4.4 million households assisted by HUD nationally.<sup>6</sup>

Why is HUD proposing such far reaching changes to a rule that has been successfully implemented for decades? HUD’s announcement of its rule on its website, **with its unprofessional and offensive emojis**, reveals that this proposed rule seeks to vilify, divide, and blame immigrants for our country's housing shortage.<sup>7</sup> Here is a screenshot of HUD’s announcement with its pack-your-bags emojis.

**HUD Moves to Close “Mixed Status Households” Roommate Loophole  
Illegals, Ineligibles, and Fraudsters:  
Pack Your Bags 🙌👛✈️**

The Secretary of HUD knows, or should know, that under Section 214:

- Eligible non-citizens have legal immigration statuses, they are not “illegals;”
- Ineligible family members cannot receive any HUD financial assistance;
- A family member who is ineligible, is almost certainly a parent or grandparent, not a roommate; and
- There is no data to document the exaggerated claim that immigrants are inherently “fraudsters;”<sup>8</sup> research indicates just the opposite, noncitizens are statistically less likely than U.S. citizens to commit benefits fraud.<sup>9</sup>

HUD's press announcement for the proposed rule further stated: "We [HUD] have zero tolerance for pushing aside hardworking U.S. citizens while enabling others to exploit decades-old loopholes." Words again do not match reality. Immigrants are hardworking and contribute much to our country. Nationally, nearly 1 in 5 workers (19%) were immigrants in 2023<sup>10</sup> with high representation in industries such as agriculture, construction, and healthcare. Immigrants contributed roughly \$194.5 billion to Social Security in 2022.<sup>11</sup>

Furthermore, inadequate funding for public and subsidized housing is responsible for pushing aside hardworking U.S. citizens - not immigrant families. Only 1 in 4 people who qualifies for housing assistance receives it.<sup>12</sup> To actually serve hard-working families, elected officials should focus on closing this gap.

As tenants in public housing told Mass Union:

- People have come here, often from war zones and really tough situations, and they work hard, pay taxes, build a family and a home.
- Immigrant families are paying rent and this is not fair.
- Children may lose parents who leave the household so that they can keep their housing.
- Immigrants work hard for less pay in jobs that support communities: childcare, eldercare, health care, yard care, food and farming.
- Immigrants own local bodegas, drive rideshares, and pick crops essential to everyday economic life.
- This won't affect just immigrant-owned business, it affects other businesses like construction.
- Grandparents play an important role in the home, bring wisdom and contribute by cooking and providing childcare for a working parents' home.
- Children of immigrants are willing to create friends and teach their friends their languages, which is a benefit to American children and they start to learn a second language without actually going to school to learn it.
- Children have compassion for each other; they come together and they start teaching each other different cultures, dance, singing, whatever it may be and they start finding out different ways of how to do different things.
- My daughter loves living in a diverse community and learning about different cultures. We go to multicultural festivals together. We want to continue to live in a diverse community, and this proposal wants to take that unity away from all of us.
- Immigrants always volunteer first at community events: cooking, cleaning, music.
- The immigrant community brings vitality to senior housing, which otherwise struggles with family disconnection.
- America itself is a nation of immigrants.
- America is great because people want to come together and learn about each other's culture. That's what it's all about.

These comments from Mass Union leaders reflect Mass Union’s value of Radical Inclusion:

“ALL tenants are welcome and crucial for our network, regardless of race, ethnicity, ability, age, language, citizenship, religion, or anything else. We take steps to ensure that all are welcome and included.”

Mass Union’s values stand in sharp contrast to the dehumanizing language used by the Administration, which shows clear animus toward immigrants for no justifiable reason.<sup>13</sup>

### **3. The proposed rule impacts all HUD tenants and will result in diverting millions of dollars from housing**

“Re-certification documentation burden would fall on all public housing residents, not just immigrants, threatening housing stability for citizens, too,” a tenant told Mass Union.

Under the proposed rule, all current and future federal public housing tenants and Section 8 tenants will have to verify their citizenship status. In Massachusetts, 340,640 individuals live in federally assisted housing covered by Section 214; nationwide 8.8 million individuals receive HUD assistance covered by Section 214.<sup>14</sup>

While HUD states that the “**vast majority** of HUD-assisted citizens or nationals likely will have already supplied documentation supporting their eligible status,”<sup>15</sup> we hear from tenant leaders in Massachusetts that their housing authority has not required this information of all existing tenants. We are concerned that a significant number of HUD residents will be required to submit documents providing their citizenship and that these new verification requirements will cost housing authorities and housing providers millions of dollars, countless hours in time, and divert limited funding away from addressing the real crisis - an affordable housing crisis.<sup>16</sup>

These new verification requirements will also cost tenants.<sup>17</sup> HUD claims that for those with eligible status, “there may be some *de minimis* costs....” But for tenants who will need to verify citizenship, costs will not *de minimis*. Tenants may need to obtain new original passports and birth certificates. This involves multiple steps, time, and application fees. If two people in a household need a passport, it will cost \$330 and have a significant impact on tenants paying for other basic needs.

Research has shown that people with low incomes or who have experienced homelessness can have difficulty providing the needed documentation quickly.<sup>18</sup> The new documentation requirement would disproportionately affect people of color, who are less likely to have up-to-date proof of citizenship.<sup>19</sup>

As tenants told Mass Union:

- Tenants will have to spend money to get these original documents and this will take away from a family's budget for rent and food or basic things for transportation.
- Even residents with no immigration issues would be burdened: all tenants would need to prove citizenship, requiring birth certificates or passports.
- Delays in obtaining verifications could cause unnecessary evictions of many elderly people who have worked here all their lives.
- They want to put information on the Homeland Security and ICE computer systems, which are riddled with errors and are tremendously inaccurate.

#### **4. The proposed rule will result in fear, trauma, self-eviction, and homelessness**

[“Deep fear and insecurity is already spreading through immigrant families before the rule takes effect,” a tenant told Mass Union.](#)

The proposed rule states that housing assistance will be “transferred” from existing mixed-status families to the non-status mixed families. “Transfer” does not mean a transfer to another unit; it means that existing mixed-status families would leave (self-evict) or be evicted.

HUD estimates that between 78% and 100% of mixed-status families would lose housing assistance by leaving and abandoning their housing.<sup>20</sup> This proposed rule is being used as a weapon to frighten immigrant families away from their homes or force families to separate. **HUD is banking on the fear that their families will be broken up.** As HUD states:

“...we expect that a **fear** of the family being separated would prompt the **departure** of most mixed families.”<sup>21</sup> (Emphasis added)

As tenants told Mass Union:

- Immigrant families are afraid to go grocery shopping and send their kids to school because of ICE. It's just going to get worse.
- Families will not separate voluntarily; if one member is forced out, the whole family will leave together.
- It is very scary for all of these things to be happening to immigrants.
- When immigrants move to a new country, they have a great deal of insecurity and now they will have more insecurity heaped on them. This is detrimental to us as a society.

- The rule will hurt residents' health, hurt their morale and will dismantle the community fabric.
- If they split these families up, you will have their children in one country and parents in another.
- This will cause childhood trauma when the families become homeless, the kids lose the stability of the schools, lose the additional food source at school, and internalize that something is wrong with them that they were kicked out of their home. It is such an intimate personal violation.
- Immigrants here are already afraid and it creates division and distrust; people need each other but fear can destroy the good will.

Where will these families go?

The National Low Income Housing Coalition estimates a shortage of 194,189 affordable rental homes for the lowest income families in Massachusetts.<sup>22</sup> In Massachusetts people need to make \$95,476 a year to afford a 2-bedroom fair market rent.<sup>23</sup> If mixed-status households are ousted from public housing and Section 8, they will likely become homeless, they could lose their jobs, their children's schooling will be disrupted, and daily life will become an uphill battle. Trauma is certain, and its costs will ripple through society, again for no justifiable reason.

## **5. The proposed rule will divert needed funds for housing to pay for needless red tape and evictions**

“Not only are you exposing all these people to hell, but you are also damaging everybody else in public housing, because there's going to be less money for housing,” a tenant told Mass Union.

HUD projects that the upfront costs of implementing the proposed rule, including administrative, eviction, moving, and verification costs, will range from **\$17 million to \$33 million**.<sup>24</sup> Millions of dollars will be diverted away from repairs, reoccupying vacant units, and hiring needed staff to operate and maintain housing. Public housing communities, which already have inadequate maintenance and operating budgets, will suffer. Instead, housing authority staff will spend hours tied up conducting new citizenship verifications for all tenants and in effect become immigration enforcement agencies instead of housing providers.

Housing authorities will also have to bear the cost of formally evicting families. HUD estimates that “at most” only about 5% or less would have to be formally evicted at a cost of \$1,000 per eviction, or a total of \$1 million for 990 families. But the cost to housing authorities to evict a tenant from public housing could be much more than HUD estimates.<sup>25</sup> HUD also fails to recognize additional costs in the eviction process could include the cost of an attorney representing a tenant household, the cost for courts and judicial staff to process evictions, and the cost of local constables to execute an eviction.

But the costs are far deeper because these forced moves will result in homelessness; tenants may lose their jobs;<sup>26</sup> kids may lose their parents; people's physical and mental health will suffer; and all of this will result in significant costs to the state and municipalities in shelter costs, increased health care costs,<sup>27</sup> and increased foster care costs.<sup>28</sup>

Diverting funds to implement the proposed rule will also take its toll on the housing and staffing that operates the housing. As tenants told Mass Union:

- Mixed-status families pay more rent, now there's going to be less money for the operational budget.
- We already don't have enough money to maintain the properties.
- Housing authorities struggle already! They need to hire more staff maintenance staff, property managers, and Resident Service Coordinators, not fire more.
- Developments would lose important family support programs: childcare, English as a Second Language classes, teenager training programs, learning center, music programs.

## **6. Proposed rule will result in fewer households receiving housing assistance during a national housing crisis**

“When the apartments are vacated by these families, there will not be funds to prepare them for new tenants, so many apartments will stay empty, which will increase the dysfunction of these communities and they will eventually be redeveloped for "affordable and mixed income" apartments or shut down altogether,” a tenant told Mass Union.

The proposed rule is designed to drive a relatively small number of mixed-status families from their homes and is an expensive undertaking for HUD and PHAs, private owners of Section 8 housing and, **as HUD states, it will result in fewer households receiving housing assistance.**<sup>29</sup>

HUD's data indicates that 70% of members of mixed-status families are **eligible members** and are either citizens or eligible non-citizens under Section 214.<sup>30</sup> Eligible non-citizen include lawful permanent residents, people fleeing violence in their country, and victims of human trafficking. **The proposed rule would effectively replace eligible individuals with other eligible individuals as public housing communities are needlessly ripped apart.**

Immigrants do not deserve to be pawns in this pointless and costly game. Furthermore, the cohesion of public housing communities is vital for the health and wellbeing of vulnerable residents, who often suffer from isolation. Tenants, including veterans, seniors, and families, rely on each other for support. The integrity of their communities must be a factor when proposing a rule change such as this, and the Administration has made no mention of the traumatic effects it

will have on neighbors if the most vulnerable members of their communities begin to disappear. As one tenant leader put it: “an attack on one of us is an attack on all of us.”

HUD estimates that an additional \$311 to \$385 million in funding would be needed to maintain the same number of assisted households because mixed-status families pay more rent than other families. Absent an increase in funding for housing programs covered by Section 214, fewer households will receive housing assistance and this impacts all residents. **We need more affordable housing, not less.**

The waitlist for state-funded public housing stood at 246,564 unique households as of January 1, 2025, according to state officials. In 2024, on average renters waited 3 years and 3 months on a wait list in Massachusetts before receiving subsidized housing.<sup>31</sup> There are other estimates that it could be a 10-year wait. In Massachusetts, people need to make \$45.90 an hour to afford a 2-bedroom fair market rent.<sup>32</sup>

The real crisis is the lack of investment in preserving and expanding public and subsidized housing. The proposed rule seeks to blame our housing crisis on immigrants.

As tenants told Mass Union:

- Loss of resources will mean empty units, degradation of developments, loss of stability in the neighborhoods – which will all be blamed on poor people, poor non-citizens.
- Facilities will be less healthy.
- This will cause more joblessness, disrupt education, and increase crime.
- All of this is very expensive. It’s much cheaper to simply provide services! Much cheaper to make housing more affordable for everyone.
- It is meant to dismantle public housing.
- Biases about who lives in public housing creates misinformation about economic sustainability, disability, and creates division.
- It’s heartbreaking. Residents stay here and their kids grow up here. There’s not a lot of turnover. If there were, people wouldn’t be as invested as they are in the community and each other. This will break the social fabric of the neighborhood.

## 7. Conclusion

“It doesn’t make sense to pass a law like this. It does not help anyone. It is a moral issue. It questions what values we have as a society,” as one young community member told Mass Union.

HUD’s proposed rule amounts to executive overreach and is contrary to Section 214, authorizing statute. It would cause needless suffering for mixed-status families and their children and would do nothing to alleviate the affordable housing crisis. Its excessive administrative burdens and costs would force housing providers to divert resources from property maintenance and resident services to pay for additional staff and regulatory compliance terminating and evicting rent-paying families. HUD’s cost estimates are banking on the fear that families will stay together and self-evict instead of breaking up. The harmful effects of this proposal will fall on *all* low income families, including citizens, who need affordable housing.

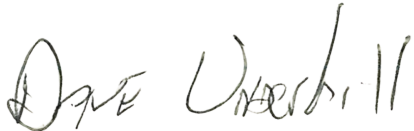
While the current regulation has successfully implemented Section 214 for decades, it is clear why HUD is proposing such far reaching changes - it has made it a priority to scapegoat and vilify immigrants and divert attention from the real issue which is the lack of affordable housing.

As a tenant said to Mass Union:

“Every human being has a right to freedom. We need to understand where we are standing, and which part of history we are standing on. So many people not only fought, but gave their life for freedom, free speech, for democracy. We cannot let this government change the road.”

The voices of our neighbors, our tenants, and our communities demand nothing less. For all of these reasons, we urge HUD to withdraw this proposed rule.

Respectfully submitted,



Dave Underhill, Board President  
Mass Union of Public Housing Tenants



Sarah Byrnes, Executive Director  
Mass Union of Public Housing Tenants



Annette Duke, Housing Attorney  
Massachusetts Law Reform Institute

## Endnotes

1. To respond to HUD’s request for public comments, Mass Union wanted to insure that public housing residents had a voice in influencing these regulations before they are final. Diverting resources from its mission-driven activities to respond, however, has been a significant challenge and administrative burden to Mass Union. [https://cep.org/wp-content/uploads/2025/03/CEP\\_Research\\_Snapshot\\_Series\\_Challenging\\_Times.pdf](https://cep.org/wp-content/uploads/2025/03/CEP_Research_Snapshot_Series_Challenging_Times.pdf)
2. Section 214 provides: “If the eligibility for financial assistance of at least one member of a family has been affirmatively established under the program of financial assistance and under this section, and the ineligibility of one or more family members has not been affirmatively established under this section, any **financial assistance made available to that family by the applicable Secretary shall be prorated, based on the number of individuals in the family for whom eligibility has been affirmatively established** under the program of financial assistance and under this section, as compared with the total number of individuals who are members of the family.” [42 USC § 1436a\(b\)\(2\)](#) (Emphasis added).
3. Department of Housing and Urban Development, 24 CFR Part 5 [Docket No. FR–6524–P–01] RIN 2501–AE16 Housing and Community Development Act of 1980: Verification of Eligible Status, Proposed rule (February 20, 2026). Section III, page 8153. <https://www.govinfo.gov/content/pkg/FR-2026-02-20/pdf/2026-03405.pdf>.
4. HUD Regulatory Impact Analysis, 3.2 Presence of Mixed Families (September 30, 2025). <https://www.regulations.gov/document/HUD-2026-0199-0006>. HUD’s Regulatory Impact Analysis further states: “...our estimates show that 78 percent to 100 percent of mixed families would lose housing assistance.” HUD Regulatory Impact Analysis, 11.2 Choosing Between Exit of Entire Family or Separation from Ineligible Members (September 30, 2025). <https://www.regulations.gov/document/HUD-2026-0199-0006>.
5. Center for Budget and Policy Priorities, *Administration Plan Targeting Immigrants Would Take Away Rental Assistance, Create New Barriers*, Table 3 (Dec 15, 2025), found that HUD’s proposal would jeopardize rental assistance for 910 mixed status families in Massachusetts based on analysis of HUD 2024 administrative data. [www.cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create](http://www.cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create)Nationally, the average mixed-status assisted household consists of two adults and two young children, with three family members eligible for financial assistance. [HUD’s Mixed Status Families Report](#). Applied to 910 households this suggests roughly 3,600-4,000 people in Massachusetts could lose their homes.
6. Center for Budget & Policy Priorities, *Administration Plan Targeting Immigrants Would Take Away Rental Assistance, Create New Barriers*, (Dec 15, 2025). Table 3. [cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create](http://cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create)
7. <https://www.hud.gov/news/hud-no-26-015>
8. While HUD claims that a recent audit of housing authorities indicates fraud, HUD has not responded to a request to see the results of the audit. “HUD did not answer questions about what information it was seeking about tenants, and did not address a request to see the results of the audit.” *HUD demands public housing officials check for immigrants*, Seattle Times (January 23, 2026). <https://www.seattletimes.com/nation-world/nation-politics/hud-demands-public-housing-officials-check-for-immigrants/>
9. CATO Institute, *Noncitizens Were Underrepresented in Welfare Fraud Convictions in 2024* (January 13, 2026) <https://www.cato.org/blog/noncitizens-were-underrepresented-welfare-fraud-convictions-2024#:~:text=Noncitizens%2C%20according%20to%20the%20Census.7.2%25>
10. Pew Research Center, *What the data says about immigrants in the U.S* (August 21, 2025), <https://www.pewresearch.org/short-reads/2025/08/21/key-findings-about-us-immigrants/#how-many-immigrants-are-working-in-the-u-s>
11. American Immigration Council, *New Data Analysis: Immigrants Driving Opportunity, Prosperity in the U.S., Including in Swing States* (June 2024) <https://www.americanimmigrationcouncil.org/press-release/new-data-immigrants-driving-prosperity-in-united-states-2022/>.
12. National Low Income Housing Coalition, *The Gap 2026: A Shortage of Affordable Homes*, <https://nlihc.org/news/nlihc-releases-gap-2026-shortage-affordable-homes>
13. Mass Union Values, Vision and Mission Statements, <https://massunion.org/values-vision-and-mission-statements/>
14. Center for Budget & Policy Priorities, *Administration Plan Targeting Immigrants Would Take Away Rental Assistance, Create New Barriers*, (Dec 15, 2025). [cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create](http://cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create)

15. HUD's Regulatory Impact Analysis, 6.1.1.1 Verification Costs (September 30, 2025). <https://www.regulations.gov/document/HUD-2026-0199-0006>.
16. HUD estimates that PHAs and owners will incur the following in verification costs: \$530,140-\$2.1 million for existing tenants and \$277,000-\$1,108,000 for new tenants. HUD's Regulatory Impact Analysis, 6.1.1.1 Verification Costs, Housing and Community Development Act of 1980, at 24 (Sept. 30, 2025).
17. HUD estimates that the new verifications of both existing and new tenants would be approximately \$800,000 - \$3.2 million HUD's Regulatory Impact Analysis, 6.1.1.1 Verification Costs (September 30, 2025). <https://www.regulations.gov/document/HUD-2026-0199-0006>.
18. Center for Budget & Policy Priorities, *Administration Plan Targeting Immigrants Would Take Away Rental Assistance, Create New Barriers*, (Dec 15, 2025). [cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create](https://cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create)
19. Center for Budget & Policy Priorities, *Administration Plan Targeting Immigrants Would Take Away Rental Assistance, Create New Barriers*, (Dec 15, 2025). Table 3. [cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create](https://cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create)
20. HUD's Regulatory Impact Analysis, 11.2 Appendix A: Choosing Between Exit of Entire Family or Separation from Ineligible Members (September 30, 2025). <https://www.regulations.gov/document/HUD-2026-0199-0006>.
21. "Our high estimate of transfers is based on all mixed-status families, comprising 79,300 persons, leaving assistance. The low estimate of transfers is based on mixed families separating from adults who are ineligible nonparents. Our low estimate is based on 62,000 persons leaving assistance." HUD's Regulatory Impact Analysis, 11.2 Appendix A: Expected Responses by Mixed Families to the Rule (September 30, 2025). <https://www.regulations.gov/document/HUD-2026-0199-0006>.
22. *The Gap: Massachusetts*, National Low Income Housing Coalition (2024), <https://nlihc.org/gap/state/ma>
23. *Massachusetts Housing Profile* (download State Report), National Low Income Housing Coalition (2026), <https://nlihc.org/gap/state/ma>
24. HUD's Regulatory Impact Analysis, 1. Summary of Proposed Rule and RIA (September 30, 2025). <https://www.regulations.gov/document/HUD-2026-0199-0006>.
25. See Boston Department of Neighborhood Development, "An Action Plan to Reduce Evictions in Boston," December 2019, p. 16 which found that the cost of executing an **eviction in subsidized housing is between \$5,500 and \$8,000**. [www.boston.gov/sites/default/files/file/2020/01/An\\_Action\\_Plan\\_to\\_Reduce\\_Evictions\\_in\\_Boston\\_%28report%29%20200109\\_1.pdf](http://www.boston.gov/sites/default/files/file/2020/01/An_Action_Plan_to_Reduce_Evictions_in_Boston_%28report%29%20200109_1.pdf)
26. A study of low-income renters in Milwaukee found that a forced move (most commonly due to an eviction) increased the likelihood of being fired by 11-20%, compared to identical workers without a forced move. *Housing and Employment Insecurity among the Working Poor*, Matthew Desmond and Carl Gershenson, *Social Problems* (2016)
27. In a report prepared for the Boston Bar Association, it was estimated the average annual health care cost for individuals experiencing homelessness was \$39,928. <https://bostonbar.org/wp-content/uploads/2022/06/rtc-report-for-web-or-email.pdf>
28. Children in about 20% of families experiencing homelessness are placed in the foster care system. <https://bostonbar.org/wp-content/uploads/2022/06/rtc-report-for-web-or-email.pdf>
29. HUD's Regulatory Impact Analysis, 1. Summary of Proposed Rule and RIA (September 30, 2025). <https://www.regulations.gov/document/HUD-2026-0199-0006>.
30. HUD's Regulatory Impact Analysis, 3.2 Presence of Mixed Families (September 30, 2025). <https://www.regulations.gov/document/HUD-2026-0199-0006>.
31. In 2024, renters waited 39 months before receiving subsidized housing in Massachusetts and 27 months before receiving subsidized housing in the US. <https://usafacts.org/answers/how-long-do-people-wait-for-subsidized-housing/state/massachusetts/>. The Boston Housing Authority receives over 10,000 new applicants every year. In July of 2023, an estimated 37,000 people were on the waitlist; by the fall, that number increased to over 42,000. <https://publichealthpost.org/health-equity/bostons-housing-waitlists-lengthy-lists-tentative-tenants/>, The average time spent waiting for a public housing unit has nearly doubled, increasing from approximately 18.9 months in 2012 to 37.0 months in 2023. The average time spent waiting for a rental voucher has increased from approximately 25.7 months in 2012 to 45.0 months in 2023. <https://massbudget.org/2024/10/02/affordable-homes-act-analysis/>
32. <https://nlihc.org/oor/state/ma>

April 15, 2026

Submitted via [www.regulations.gov](http://www.regulations.gov)

Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> 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 Alliance of Cambridge Tenants (ACT) is writing in response to the Department of Housing and Urban Development's (HUD) proposed rule 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").

ACT is a tenant organization located in Cambridge, Massachusetts that advocates for the rights of low-income public housing and Section 8 vouchers tenants. 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:

1. The costs of eviction and checking everyone's status are prohibitive. This new rule is not an efficient use of resources and will not solve the housing shortage problem.
2. It could cause increases in homelessness, which is bad for all of society.
3. Diversity is one of our core values as Americans. These are our neighbors and we want them to stay.

**The proposed rule is an inefficient use of resources.**

The new rule is expensive to implement since now every HUD subsidized tenant will need to submit documents proving their citizenship. Staff will need to spend more time and energy following up with tenants and reviewing their documents. This is not an administrable solution. Identifying and removing families with mixed-status households is time-consuming and will not be possible. The rule will not work. It will only take resources away from investments into safe, stable housing.

Additionally, immigrant families contribute millions of dollars to public housing through their rental payments. The loss of money could decimate public housing. Due to the lack of rental payments, housing authorities may not be able to rehabilitate the empty apartments and fill them with new tenants. Vacated apartments can create security issues. Instead of removing immigrant families with mixed statuses who contribute to the economy and sustainability of the housing, that money should be used to develop more housing.

Given the inefficiencies created by this new proposed rule, it is clear to us that HUD is not making efforts to actually increase housing for U.S. citizens. Instead, this rule demonstrates the administration's biases against people in publicly assisted housing. It is a rule that creates misinformation about the availability of housing and sows division. Rather than implementing this rule, it would be cheaper to provide services to public housing tenants and make housing more affordable to everyone.

**The proposed rule will increase homelessness which has negative effects on society.**

ACT cares deeply about all the tenants we represent. We have serious concerns about how this rule might affect children in public housing especially. Families who are no longer eligible for public housing may become homeless. This causes childhood trauma as children lose stability in their home life. It may affect their ability to attend school. The effects on their ability to learn are huge, especially if they lose access to school meals.

Families deserve to live together in stable, safe housing. Homelessness does not benefit other individuals in society. It only leads to the criminalization of families who cannot afford housing and costs the state money. Keeping people housed is important to the public's tax dollars.

**The proposed rule does not take into account the value of diversity in our communities.**

This is a nation founded by immigrants. The diversity in our communities is beautiful and brings richness. The people affected by this rule are our neighbors. We all learn from each other. Our children are friends. Through our interactions, we learn about coming together across differences and how to be good community members. A tenant in our organization stated that the reason their kids are taking other language classes in school is because of how much they've learned from others in the public housing development.

Immigrants make up an important part of our communities and our labor force. They are essential workers in our society. If they face housing instability, that could affect their ability to contribute positively to the community and to work. This not only impacts our communities but also our economy.

HUD's rule will have detrimental effects on the communities we value and care about. It is not a rule that will make housing more affordable and available for U.S. citizens. Rather, it wastes public resources on burdensome administrative tasks that are unnecessary. Our love for our neighbors, our tenants, and our communities demand that we speak up against this. For all of these reasons, we urge HUD to withdraw this proposed rule.

Respectfully submitted,

The Alliance of Cambridge Tenants

Submitted via [www.regulations.gov](http://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 Boston Housing Authority Youth Council 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 young residents of Boston’s public housing communities, we represent a generation that has grown up alongside immigrant neighbors, classmates, and friends. We see every day how stable housing allows families to work, raise their children, and contribute to the life of our neighborhoods. 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 made richer by the presence of immigrants**

Immigrants bring culture, diversity, and life to our neighborhoods. In communities like Dorchester and Jamaica Plain, the presence of Dominican, Hispanic, and other immigrant families has shaped the character of our streets through restaurants, corner stores, festivals like Cinco de Mayo, and the everyday warmth of neighbors who know each other by name. As one of our members put it: “the community is more diverse with many people from different cultures, and it makes it feel more welcoming to other people.”

We also learn from each other every day. Young people from different backgrounds (Hispanic, Asian, and others) share customs and traditions, learning from one another in ways that no classroom alone can replicate. Immigrants look out for everyone in the building, not just their own families. They participate in weekly cleanings, community gatherings, and building life. As one youth member said: “I don’t think there are any negative aspects to it at all. They look out for us just as we look out for them.”

Many immigrants also bring a deep sense of gratitude for opportunities that those of us born here may take for granted. One member shared the story of a relative who came here and considered buying a hamburger a special occasion, something that felt extraordinary when it was rare back home. That same relative’s neighbor, a woman who ran a corner store, used the income from her immigrant customers to provide free ice cream to every child at a local school. They pay it forward.

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.

### **With Fear and insecurity caused by immigration enforcement harm our entire community**

Young people in our community are keenly aware of the fear that immigration enforcement has created. As one member explained: “It’s very scary for all of these things to be happening around them, and for them to not be able to feel they have security and shelter.” Instead of spending energy building their families and earning income, immigrant neighbors are forced to spend that energy simply ensuring they won’t be removed.

Importantly, this fear extends far beyond immigrants themselves. As our members noted: “you don’t have to be an immigrant, you can look like them and still be impacted.” Young students who might be targeted based on appearance are afraid to go out, afraid to pursue their education, afraid to simply live their daily lives. And when a best friend or neighbor is detained, that is a direct impact on all of us, because we are all intertwined.

We have also seen immigrants become too afraid to seek help when they need it most. One member described a friend who faced a medical emergency but refused to go to the hospital out of fear of being detained. Immigrants are increasingly reluctant to call the police even in genuine emergencies, treating law enforcement as a last resort. When people are afraid to access basic services, the safety and health of the entire community suffers.

When immigrant-owned businesses close because their owners are removed, our neighborhoods lose the diversity and vitality that made them worth living in. As one member put it: “it’s like a husk of what it was.” The damage is not just economic, it is the loss of the community itself.

### **Documentation barriers put families and long-time residents at risk**

The proposal would require every household member to provide proof of citizenship or eligible immigration status. Our members immediately recognized how burdensome this would be in practice. A passport costs over \$170 and takes significant time to obtain. Birth certificates require missing work or school. Documents can be lost, delayed, or difficult to retrieve if you were born in another state. As one youth member observed: “it helps no one in the end, not just immigrants, but U.S. citizens as well. Someone could miss a payment trying to gather documents in time and end up on the streets regardless.”

For mixed-status families, where one or more members may lack documentation, the stakes are even higher. As one member described: “You could lose your father or your mother simply because they didn’t have the same papers you did. That’s a really scary thing to think about.”

### **This rule harms the entire public housing community, not just immigrants**

Our members were clear: this rule is “a net negative for literally everybody.” When immigrant families are displaced, the rent burden on remaining tenants increases. Revenue that supports building operations disappears. Communities become less connected and less safe. And the jobs that immigrants fill, construction, building maintenance, agricultural work, the labor that keeps our cities running, go unfilled, because, as our members noted, many of these are jobs that others are unwilling to do.

Farms in California are already closing because there are no workers to harvest crops. Subway repairs take longer. Buildings go unmaintained. The consequences are not abstract, they are felt every day in communities like ours. As one youth member put it: “a lot of our buildings were built on the backs of immigrants. Removing these people will not only affect them, it will affect everyone.”

It is also completely unnecessary to spend valuable public resources targeting people who are paying their rent on time and not disturbing anyone. Those resources could be directed toward something far more valuable and helpful for our communities.

### **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, driving up homelessness rates at a moment when the private rental market is already out of reach for most families.

### **Why we speak**

The youth members who contributed to these comments did so with pride. As one said: “I’m glad I can use my voice to vocalize it for people who are maybe too afraid or too at risk to talk.” Another added: “I’m just here to vocalize it for people that just can’t, or just don’t know enough.”

We are the generation that will inherit the communities being shaped by decisions like this one. We have grown up in diverse neighborhoods. We have immigrant friends, immigrant family members, immigrant neighbors who have shaped who we are. We understand what is at stake. And we believe, as one member said, that this rule “really makes no sense for anyone to think would be a beneficial thing to pass.”

At its core, this is a moral question about what values we hold as a society. The values written into the founding of this nation, dignity, inclusion, opportunity, are in direct contradiction with a rule like this one. How can we pass a law that harms so many people who work hard, pay their rent, and contribute every day to the communities we share?

### **Our position as the Boston Housing Authority Youth Council**

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, young and old, who calls our community home.

For these reasons, the Boston Housing Authority Youth Council 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,

Boston Housing Authority Youth Council

Submitted via [www.regulations.gov](http://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 Brockton 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 Brockton 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**

Brockton 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 neighborhood schools, we worship together, and they show up at the front of every community event, asking: “What can we do?”

Immigrants in our developments contribute their cooking, their music, their art, and their culture. When we hold celebrations, from Cinco de Mayo to our community vibrancy programs, it is our immigrant neighbors who arrive in traditional cultural attire, who bring their children’s dance troupes, who make posters and decorations and remind all of us what it means to be proud of where we come from. As one of our resident leaders put it: “It makes us whole. You can’t have a civilization in a vacuum.”

In our churches, immigrants bring their cultures, their styles of worship, and their music. We learn to intertwine our traditions. We praise the same God in different ways, and we find ourselves richer for it. Immigrant children speak multiple languages and teach those languages to their American-born friends, a gift that no classroom can fully replicate.

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 Brockton for decades.

The recertification process itself carries steep financial and administrative costs. For families already stretched thin, the money spent navigating this process is money taken away from food, rent, and transportation. These are not abstract burdens, they are choices that real families in our community will be forced to make.

### **The proposed rule harms the entire public housing system**

This rule does not only harm immigrant families, it harms every resident of public housing.

"Mixed-income families who pay a pro-rated and higher rent currently contribute approximately \$300 million per year to operational budgets. If these families are displaced, that funding disappears. An already underfunded system will be stretched even further, and remaining residents will face higher rents and deteriorating conditions. As our members said plainly: this rule is "like shooting yourself in the foot."

Vacant units created by prolonged recertification processes give justification to raise rent scales, from 30% to 35% to 40% of income, at a time when most residents cannot afford to pay more. The logical and financial case for this rule simply does not hold up.

### **We have seen what happens when our government abandons immigrants**

We have lived this. When Haitian families were brought to Brockton and left at a shelter on Spring Street with \$50 and nowhere to go, it was our churches, not our government, that stepped in. We provided shelter, work, and a path to legal status through community organizations. It took telephone calls, footwork, negotiation with landlords, and months of effort. It should not have to be that way.

When families are separated by enforcement and deported not to their country of origin but to wherever will accept them, with no support services, no paper trail, and no path to reunification, communities like ours pay the price. Children end up in one country, parents in another, with no clear way back to each other. We have already seen this. We do not want to see it again.

Immigrants who come here, build lives here, and in many cases enlist to serve this country deserve better than to be cast aside. As one of our veterans put it: "We all wore green. We all represented this country. There was no color."

### **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. We saw this firsthand with the arrival of Haitian families in Brockton, and our shelters were not adequate then, and they are not adequate now.

### **What motivates us to speak**

Our resident leaders were raised to believe they are their brother's keeper. They were taught that if you can affect one person's life in a positive way, you have lived a good life. They step between bullies and tenants in their own buildings. They show up at other developments when they are called. They do this every single day.

They do it because every human being has a right to freedom. They do it because they have seen segregation with their own eyes, riding in the colored car on the train south, being turned away from stores, and they refuse to let history repeat itself. They do it because the Constitution, whatever its original limitations, now means everybody. We the people mean all of us.

As one member said: “If you’re telling others to go back, you might as well go back too, because your ancestors came from somewhere else as well.”

**Our position as the Brockton 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 Brockton home.

For these reasons, the Brockton 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,

Brockton Resident Alliance

Submitted via [www.regulations.gov](http://www.regulations.gov)

Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> 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

Submitted via [www.regulations.gov](http://www.regulations.gov)

Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> 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

*Submitted via [www.regulations.gov](http://www.regulations.gov)*

**\_ Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> 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 Fall River Joint Tenant Council 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").

**Diversity is a strength of Public Housing.**

Fall River has long been home to a Portuguese community. Now there are Haitians, Cambodians, Cape Verdeans, Spanish speakers from all over the Americas, Asians, and more. The bonds between kids of different cultures helps adults learn to challenge their own biases. Having the opportunity to live with people you are unfamiliar with forces you to realize that we're all the same. There is great pride in these communities, in our community events and in each other as neighbors. Low income does not equate with low IQ or low integrity. As such, public housing developments are communities that *strengthen* the social fabric of this country. Disrupting the immigrant population in public housing will create division, reiterate old biases, and increase fear and lack of trust.

**Stable families means stable communities.**

Mixed status families will not split up when you ask one parent to leave. The whole family will leave. Fall River already has a homeless encampment near the waterfront. Homelessness will increase. Crime will increase. People will be afraid, divided and will no longer take pride in the communities. The communities themselves will deteriorate, and public housing as a whole will suffer.

**These people are not illegal.**

This proposal hurts thousands more citizens and eligible non-citizens than it does the people who are targeted – ineligible non-citizens. And these people are not illegal. They are not "fraudsters." They are not even receiving housing assistance! They are living with family members who are, but the whole family's assistance is prorated. These people have been allowed to live with their families for decades, contributing to the stability of low-income citizen communities. Destabilization benefits no one.

**Requiring documentation burdens everyone.**

Providing documentation can be a significant burden for any tenant, especially those on fixed incomes. Some elders have not had to provide documentation in a long time and may not have (them on hand?) immediate access to what they need. Obtaining copies of specific documents can mean money and time and even transportation that some tenants just don't have. This ruling would affect every public housing resident in the state, not just immigrants.

**Huge and immediate financial loss to already struggling housing authorities.**

Millions will go to administrative costs to check everyone's documentation, and hundreds of millions will be lost immediately in rent when these families leave. Mixed status families pay more rent than fully subsidized families. So all funds generated through rent, even if all the vacated apts are filled, will be substantially less than what was generated before. So how does this help public housing? The money won't be there to rehab and refill the vacated apts, so they will stay empty. Capital plans will be unfunded and halted. Buildings that are already in disrepair will further deteriorate. This will bring crime as well, and the families living in that housing will be blamed. Housing authorities will have to build partnerships with private developers who don't care, and the family atmosphere will erode. It will no longer be a place where you are known, respected, and listened to, and where your needs are honored.

**Fall River Joint Tenant Council is committed to every tenant.**

Mixed status families are our neighbors and an important part of our community. They bring income and additional stability to their families, and so to our public housing developments. With no plan to replace the funds that will be lost due to this proposal and no justification for displacing these families, Fall River Joint Tenant Council opposes this proposal.

Respectfully,

The Fall River Joint Tenant Council  
Fall River, MA

*Submitted via [www.regulations.gov](http://www.regulations.gov)*

**Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> Street SW, Room 10276  
Washington, DC 20410-0500**

**Re: HUD Docket No. FR-6524-P-01, RIN 2501-AE16  
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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

Submitted via [www.regulations.gov](http://www.regulations.gov)

Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> 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

Submitted via [www.regulations.gov](http://www.regulations.gov)

Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> 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

***Submitted via [www.regulations.gov](http://www.regulations.gov)***

**Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> 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:**

**Comment Submitted by the Mildred Hailey Tenant Organization**

**The Mildred Hailey Tenant Organization writes to express our strong opposition to the proposed 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 the “proposed rule”).**

The Mildred Hailey Tenant Organization represents approximately 800 units of families, elderly, and residents with disabilities. The first tenant organization at the Mildred Hailey public housing development in Jamaica Plain was established in 1971 and was the first of its kind in the nation.[2]

We are a diverse, multiethnic, and multiracial community that has lived together in harmony for generations. Our children grow up here, our elders remain with their families, and neighbors care for one another. We function as an extended family, providing mutual support and solidarity during difficult times.

Our community operates a food pantry two days per week, as well as a Youth Center, a nursery, and a daycare program for our children. These programs exist because residents rely on stable housing and community cohesion in order to thrive.

For these reasons, we strongly oppose the proposed federal regulations that would further restrict access to public housing and rental assistance based on immigration status. Such restrictions would undermine family stability, disrupt longstanding communities, and weaken the vital support networks that public housing residents depend upon.

**Respect for immigrant families and the risk of disrupted childhoods: education, friendships and development.**

The impact would be profound and deeply painful for our entire community, especially for children. It is heartbreaking to see entire families, including small children and teenagers who are trying to study and move forward—face the possibility of losing their homes. Many immigrant families come from countries where opportunities are extremely limited, where access to education and safe housing is not guaranteed. Some do not even have a home to return to.

Here in this country, through great effort and sacrifice, immigrant families are able to work, provide food for their children, pursue education, and build a more dignified life. Even when it requires working double shifts or multiple jobs, there is hope—hope that their children can study, grow, and live with greater stability. Losing federal public housing would destroy that stability.

Most immigrants arrive in this country carrying a dream: the dream that their children can grow up in a free society, attend university, and pursue their goals without fear. Displacing families from public housing threatens that dream. For many, returning to their country of origin is not a real option. Years have passed, communities have changed, loved ones have died, and what once felt like home is no longer recognizable. Forced displacement places families into an unknown world with no support system.

Children would suffer the most. They would be forced to adapt suddenly to a place they do not know, a culture they may not remember, and a life without stability. The psychological impact would be severe—fear, anxiety, trauma, and the loss of their sense of safety. Children who are currently learning, growing, and dreaming would instead be forced into survival mode.

People deserve the right to live in peace and dignity, regardless of where they come from. Immigrant families deserve to be heard, to have their voices respected, and to have the opportunity to build a stable life for themselves and their children. Everyone deserves the chance to live without fear and to choose a place they can call home.

**New Documentation requirements will be an undue burden.**

We are providing this testimony to explain the serious consequences that new documentation requirements and immigration enforcement have on immigrant families and on the broader community.

On many occasions, obtaining official documents becomes extremely difficult. The embassy of our country is highly problematic when it comes to providing assistance. Phone calls are not answered; offices are often closed; and requests go unanswered. I personally tried to obtain a document from my country and was unable to do so. For many people, this process is nearly impossible.

While some individuals, including myself, may currently have the required documents, this situation affects everyone. One never knows when documentation will become difficult or inaccessible. These requirements will have a serious and widespread impact.

**Immigrants provide important, and undervalued, labor and leadership. Communities and businesses will be devastated.**

The disruption will spread throughout the entire community. People will lose jobs and leadership roles in businesses, churches, and community organizations. Some residents own businesses, others work essential jobs, volunteer in churches, or run food pantries. If these individuals are forced to leave, who will take on these responsibilities? Entire organizations, many of them led by Latinos, would be left without leadership or support.

In my church, there are people from Venezuela who are now afraid to attend services because they fear being stopped or having their children taken away. Many have been forced to give up their homes and resign from their jobs. They live in hiding and are even afraid to go out to buy food. Some are waiting for others to bring them a small bag of groceries. The emotional and human cost of this fear is painful and devastating.

It must be said clearly: Hispanics do a disproportionate amount of essential work, often for very low pay. Many immigrants are paid wages that others would not accept. We do work that keeps communities functioning, yet we are undervalued and underpaid. We deserve more respect and recognition for our contributions.

Everyone eats the same food, yet there are so much division and hostility. It is immigrants—Hondurans, Mexicans, Salvadorans—who harvest food in fields across California, Florida, and Texas. Their labor helps sustain the economy and the daily lives of people across the country.

These policies do not only harm immigrants; they harm entire communities. We urge those in decision-making positions to consider the real human impact of these requirements and to recognize the essential role immigrants play in sustaining our society.

## **The Impact of Discriminatory Policies on Our Communities**

We offer this testimony to describe the essential contributions immigrants make to our communities and the serious harm caused by policies that fail to recognize that reality.

Immigrants contribute enormously to this country and to our local communities, yet we are often not recognized. We contribute in every sense, especially through work. In many cases, people who do not have immigration documents still pay taxes using a tax identification card. If the government allows individuals to work and pay taxes, why are those same individuals not recognized in other ways? For some purposes, we are accepted, yet for others, we are ignored or excluded. This situation reflects a broader injustice. We are living in a world where money holds power, and the value of human labor and contribution is overlooked. What we contribute no longer seems to matter—profit comes first.

Hispanics—and immigrants more broadly—work more and earn less. We pay taxes, collaborate, help one another, and support our communities. Many of us come from countries marked by suffering, injustice, political persecution, and economic hardship. These experiences give us insight and resilience. When we look at what is happening now, we recognize familiar patterns. Discrimination today is not only political, but it is a moral issue. It reflects a loss of values, where profit is valued more than human life.

We are witnessing families displaced by rising rents, people forced onto the streets, children removed from stable homes, and families separated. These realities deeply affect working families. Single mothers with two or three children struggle to provide food and pay rent. Parents work multiple jobs yet still cannot afford housing. Childcare costs force mothers to leave their children with relatives or friends because they have no other option. These burdens fall on the poor, while those in power neither see nor feel the consequences.

We are told this is government, but many of us experience it as oppression. These systems place the greatest weight on those with the fewest resources. Everyone is affected—residents, undocumented individuals, and citizens alike. No one is truly spared under policies that disregard human dignity.

Without immigrants, essential work would not get done. Who will perform these jobs for the wages currently offered? Who will volunteer the way many immigrants do? These questions deserve honest answers. We must continue to speak clearly and loudly because this situation is not right.

Discrimination driven by greed puts profit before people. Immigrants are not harming anyone. They are running businesses, raising families, caring for children, supporting communities, and trying to live in peace—just like everyone else. They deserve a voice, dignity, and an opportunity to contribute without fear.

We urge decision-makers to recognize immigrant contributions, to reject policies rooted in discrimination, and to place human dignity and community well-being at the center of public policy. Immigrants are hard workers. They cultivate the land, harvest crops, wash, clean, and sweep—jobs that others often refuse to do, especially for low wages. This labor is real, necessary, and valuable.

It is painful to think about where this country is headed if immigrants continue to be pushed out. If so many people are forced to leave, what will happen to the United States? Who will do the work that keeps this country functioning? A nation without immigrants would be lonely and empty, because immigrants are the ones doing much of the essential work that holds communities together.

For these reasons, we urge HUD to respect the hard-won lives that immigrants have built here, acknowledge the interdependence and collaboration that defines public housing communities, and so withdraw this devastating proposal.

Respectfully submitted,

Mildred C. Hailey Tenant Organization

Boston, MA

*Submitted via [www.regulations.gov](http://www.regulations.gov)*

**Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> 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 Mystic Tenant Organization in Somerville, 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. Stable families make stable communities.**

We live in a very strong community of families, elders, and disabled individuals from incredibly diverse backgrounds and identities, many of whom live mixed status families. We have learned to acknowledge, respect, include and rely on each other every day. We have created programs that support families, youth and elders: childcare, music programs for youth, ESOL classes, support to help teenagers become interpreters, a learning center for homework support, and more. These programs help low income families and youth gain skills and confidence to contribute to the larger social fabric around us. Mixed status families run these programs and lead our community. Losing these families would devastate our community. People are already scared. This rule will create fear and division, overcrowding, homelessness and increase crime. There is no family shelter in Somerville.

Additionally, most mixed status families are Latino. Family is very important for the latino community. Our children and our elders cook and provide childcare so that parents can work. They bring wisdom and stability to busy families. Latino families will never send their grandparents or parents away. They will move out together, again, creating overcrowding and homelessness, and traumatizing children.

**2. Immigrants contribute important labor and taxes to our communities and economy.**

Immigrants often work longer hours for less pay in jobs that many citizens don't want. They provide childcare, eldercare, food/farming labor, yard care, construction labor, etc. When mixed status families lose their housing, they will be far less able to work. This will affect small businesses in the community and larger corporations that benefit from seasonal and low wage labor sources.

**3. Documentation required will be costly and redundant for many tenants.**

HUD requires identification and proof of income for annual recertification for all tenants. This process is already cumbersome. Immigrant status has already been determined. Requiring birth certificates and potentially marriage/death certificates related to name changes – especially for elders from other countries, could be so difficult that it will threaten their capacity to maintain their home even if they are eligible for housing assistance. This is an undue burden for people who in

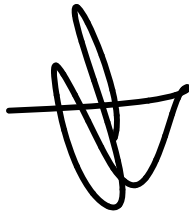
many cases have been here for decades, raised children here, paid taxes here, and followed all the rules.

**4. There is no wisdom in taking *Hundreds of millions of dollars* away from local housing authorities that already struggle with significant disrepair.**

This proposal will cost housing authorities hundreds of millions of dollars even before turn over and rehab costs are figured in for each vacated apartment. For us, this loss will mean loss of precious staff as well. We have designated police personnel who are focused on community relations instead of criminalization. We will lose funding for the handful of programs that help families stay at work and our children and elders stay engaged productively in this society. When our children are less engaged, they don't develop the skills to contribute, to lead, to act with dignity and respect – because they and their families have not been treated with dignity and respect. This loss will mean the deterioration of the facility and our homes. Empty units will bring crime and unhealthy living conditions. Families will lose pride in their homes and no longer take responsibility for the needs of everyone. We will become divided and afraid. The loss of this culture of community respect and support, shared responsibility for all, is a deep and significant loss for the larger community and for Somerville as a whole.

We cannot support a proposal that takes so much from our community and benefits no one. This rule will not even support the capacity of housing authorities to bring in new tenants who do not have mixed status, if that is the goal. And we will not support rules that further restrict public housing and rental assistance solely on the basis of immigration status.

Respectfully submitted,

A handwritten signature in black ink, consisting of several overlapping loops and a horizontal line, likely representing the name Rey Santana.

Rey Santana  
MTA President