

Submitted via www.regulations.gov

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

**Re: HUD Docket No. FR-6524-P-01, RIN 2501-AE16
Comments in Response to Proposed Rulemaking
Housing and Community Development Act of 1980: Verification of Eligible Status**

Dear Office of General Counsel:

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