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*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](https://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/rhc-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/rhc-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>