

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:

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

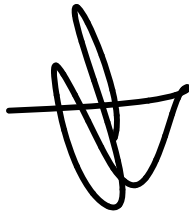
many cases have been here for decades, raised children here, paid taxes here, and followed all the rules.

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