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Submitted by: Mercedes Elizalde on behalf of Central City Concern

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-6124-P-01, RIN 2501-AD89 Comments in Response to Proposed Rulemaking:
Housing and Community Development Act of 1980: Verification of Eligible Status

Dear Sir/Madam:

I am writing on behalf of Central City Concern 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 May 10, 2019 (RIN 2501-AD89; HUD Docket No. FR-6124-P-01). We urge the rule to be withdrawn in its entirety, and that HUD's long-standing regulations remain in effect.

Central City Concern is a non-profit direct service organization that provides integrated primary and behavioral health care, supportive and affordable housing, and employment services to people impacted by homelessness in the Oregon Tri-County area. Central City Concern operates about 2,000 units of affordable housing, serves 9,000 patients annually through our 13 Federally Qualified Health Centers, makes 700 job placements annually and operates social services for the community justice programs in Multnomah and Clackamas counties. The Hooper Detoxification Center alone sees 2,400 admits each year split 50/50 between alcohol and opiates. This year we are celebrating 40 years of service to our communities.

At Central City Concern we are a partner organization to our local housing authority known as Home Forward. We operate both project-based units and house families with housing choice vouchers in our properties. This rule would require additional administrative burden and financial losses to vacate units or risk losing long-term subsidies that have and could continue to serve hundreds of households over the life of the properties. We are not in the business of evicting low-income residents, but this rule would ask us to violate our mission and values and to betray our communities. With a history of disinvestment in public housing, HUD and the housing authorities need partnerships from organizations like ours.

Although HUD contends that the proposed rule is a means of addressing the waitlist crisis faced by a majority of Public Housing Authorities nationwide, at Central City Concern we do not believe you can address the shortage of affordable housing by making more families homeless. In fact, HUD is banking on this, noting in their regulatory impact analysis that "HUD expects that fear of the family being separated would lead to prompt evacuation by most mixed households, whether that fear is justified." Therefore, this rule would effectively evict as many as 108,000 individuals in mixed status families (in which nearly 3 out of 4 are eligible for assistance) from public housing, Section 8, and other programs covered by the proposed rule. These mass evictions and departures from housing assistance will cause increased rates of homelessness and unstable housing among an already vulnerable population.

We recognize that the proposed rule is a part of the current administration's coordinated attack on immigrant families. We all share the concern that millions of U.S. households struggle to find affordable housing in the ongoing nationwide housing crisis, but blaming struggling immigrant families will not fix this problem. The real issue is the lack of sufficient funding and a continued pattern of cutting funding to housing programs. Again this year the administration proposed another cut to HUD programs. We value the work of congress in reversing course last year to stabilizing funding, but a major increase in housing resources is needed. Approximately 1 in 4 families that qualify for HUD housing programs actually get access, attacking families already living on the margins will not change this dismal access rate; only a major investment in HUD's housing programs can really change the tide of access to end homelessness.

With regard to addressing homelessness, the proposed rule is in direct conflict with federal policy priorities of ending homelessness and federal mandates for states to provide certain assistance and programs to everyone. For example, the U.S. Interagency Council on Homelessness (USICH) has prioritized ending and preventing homelessness among families with children, regardless of immigration status. USICH's mission is to affirmatively remove barriers to housing access, all while acknowledging that "communities that are diverse—in their demographics, in their needs, in their geographic characteristics, in their progress to date, in their resources, in their infrastructure, in their housing markets, and in many other ways." The proposed rule directly contradicts this policy goal by erecting additional barriers to housing access. Furthermore, the rule is in conflict with the National Affordable Housing Act's edict to ensure that "every American family be able to afford a decent home in a suitable environment."

Access to stable and affordable housing is a basic platform for family and community health, well-being, and dignity, and our communities thrive when everyone has access to a high quality home. Immigrants and their families are vital to parts of the country's social and economic fabric, and we should be building a housing system that creates the conditions for all of us to flourish. So again, we ask that this proposed rule be abandoned to avoid devastating financial burden and untold trauma to the families, especially children and seniors, who would be impacted.

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact Mercedes Elizalde, Public Policy Director at Central City Concern (Mercedes.Elizalde@ccconcern.org) to provide further information.