



June 28, 2019

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 Community HousingWorks 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). HUD's proposed rule to change the regulations implementing section 214 and to add additional layers of bureaucracy to an already-implemented law is misguided and deeply concerning. We urge HUD to withdraw this rule.

Community HousingWorks is a non-profit owner and developer of affordable apartment communities across California. We invest in safe, stable homes where people can succeed. California residents have deep housing needs that are among the most critical in the nation. California has the highest percentage of poverty in the nation when housing costs are factored in—rents have increased by 21% since 2000, while renter incomes have dropped 8% over the same period. People living on low wages or fixed incomes have to make choices between paying the rent and food and other basic necessities—a choice that we believe no one should have to make.

Per HUD's own analysis, the targeting of mixed-status families would not clear public housing waiting lists - instead it would render tens of thousands of American children homeless. HUD should be directing its focus on scaling up programs and policies that work to address the needs of underserved communities. HUD should work to eradicate poverty and ensure housing policies are fair and equitable. Community HousingWorks strongly opposes the proposed amendments, and we urge the administration to turn its focus to more efficiently and equitably serve low-income communities.

This proposal would be particularly harmful to the U.S. Latino community and our nation's future. Today, the Latino population is more than 55 million people, or roughly 18 percent of the total U.S. population. Despite their hard work and contributions to the economy, Latinos continue to struggle to find affordable housing. In 2017, 55 percent of Latinos who rented their home were cost-burdened – meaning 4.4 million Latinos spent a third or more of their income on rent.

Access to federal housing assistance has helped Latinos lift themselves out of poverty. According to an analysis by UnidosUS, federal housing assistance – including public and other subsidized housing – lifted approximately 800,000 Latinos out of poverty in 2017, including more than 280,000 Latino children. The proposed rule would deter many eligible Latinos from participating in public or subsidized housing programs and increase housing insecurity for Latino families. A recent analysis of HUD’s administrative data estimates that 85 percent of households at risk of losing assistance under this proposed rule are Latino.

We urge HUD to immediately withdraw its current proposal and dedicate its efforts to advancing policies that strengthen—rather than undermine—the ability of immigrants to support themselves and their families in the future.

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact me to provide further information.



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