



July 9, 2019

Mr. Paul Compton
General Counsel
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, D.C. 20410-0500

Submission via: <https://www.regulations.gov/comment?D=HUD-2019-0044-0001>

DHS Docket No. FR-6124-P-01

Re: Proposed Rule on Housing and Community Development Act of 1980: Verification of Eligible Status

Dear Mr. Compton:

The Boston Public Health Commission (BPHC) appreciates the opportunity to comment on the Department of Housing and Urban Development's (HUD) Proposed Rule on Verification of Eligible Status.

Public service and access to quality health care are the cornerstones of our mission - to protect, preserve, and promote the health and well-being of all Boston residents, particularly those who are most vulnerable. We achieve our mission by providing and supporting accessible high-quality community-based health and social services, community engagement and advocacy, development of health promoting policies and regulations, disease and injury prevention, emergency services, health promotion, and health education services.

BPHC envisions a thriving Boston where all residents live healthy, fulfilling lives free of racism, poverty, violence, and other systems of oppression. All residents will have equitable opportunities and resources, leading to optimal health and well-being. BPHC has long been a leader in the field of public health. Our nationally recognized efforts to advance health equity places us at the forefront of public health innovation and we promote every opportunity to examine issues with a health equity lens.

We know health is shaped by social and economic opportunities and environmental conditions of communities – often referred to as the social determinants of health. Some examples of social determinants of health include but are not limited to adequate employment and income, affordable housing and transportation, and neighborhood safety. These protective factors help to mitigate risks enabled by social conditions such as racism, sexism and poverty. In Boston, good health is not shared by all residents. People of color experience poorer health outcomes than whites, in part due to the inequitable distribution of these and other social and environmental

resources. BPHC works to provide access to resources that serve as protective factors, such as nutritious food, mental health counseling and housing.

We are deeply troubled by the proposal to restrict the eligibility for public and other subsidized housing. The proposed changes to Verification of Eligible Status will both enlarge the scope of those experiencing housing insecurity and alter family structure and the Boston community. HUD estimates that 55,000 children will be displaced nationally, creating the choice between basic needs like housing and family separation or homelessness. The impending displacement of children and families has concerning health implications for the well-being of children living in Boston's public and other subsidized housing.

Boston is a thriving city, richer for its mix of ethnicities and cultures. According to the Massachusetts Immigrant and Refugee Advancement Coalition, one in six Massachusetts residents, and one in five workers, is foreign-born. In Boston, using the American Community Survey, the Boston Planning and Development Agency has determined that approximately 97,322 non-citizens live in the city and the U.S. Department of Homeland Security shows there are 340,000 Green Card holders in Massachusetts. Immigrants and refugees are an asset to our city and state and their diversity is a gift.

We can estimate that the impact of this ruling would be vast and significant for both children and adults. In Boston alone, there are more than 12,000 units of affordable housing. Social determinants are rarely singular, and these units are homes to families who are typically experiencing a myriad of health inequities. The median-income for mixed status families is \$18,000. According to the National Low-Income Housing Coalition, a Massachusetts resident would need to earn \$70,333 annually to afford a two-bedroom apartment in Massachusetts. The likelihood of families who presently make \$18,000 being able to afford an apartment in their community that requires earnings of \$70,333 is improbable. The cost implication of mixed-status family evictions is extremely burdensome and BPHC stands with our immigrant communities to combat inequities including access to safe and affordable housing.

BPHC does not support the proposed mixed-status rule change. We continue to believe that if this rule is finalized, it will put the health and wellbeing of millions of people at great risk and violates our core American values. If you have any questions regarding this letter, please do not hesitate to contact Catherine Cairns, Chief of Staff for BPHC at 617-534-3041 or CCairns@bphc.org.

Sincerely,



Monica Valdes Lupi, JD, MPH
Executive Director
Boston Public Health Commission