

July 9, 2019

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-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 Causa Oregon 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). Causa opposes the proposed rule change, and stands in opposition to Oregon's values as a state that welcomes immigrants and supports and empowers low income residents. We urge the rule to be withdrawn in its entirety, and that HUD's long-standing regulations remain in effect.

Causa Oregon was founded in 1995 and works to improve the lives of Latino immigrants and their families in Oregon through advocacy, coalition building, leadership development, and civic engagement. Latino immigrants and their families are the heart of Causa and inspire, implement, and champion our work. Causa's staff collectively share expertise in national and local policy and laws affecting immigrants, civic engagement, and, most importantly, the lived experiences of belonging to and supporting families that include non-citizen immigrants. We directly support families in engaging with their elected leaders, building leadership skills, and learning about the issues that most impact their community.

We strongly oppose this proposal in its entirety. Housing stability is crucial to the health of our children and families. This proposal could evict 800 or more<sup>1</sup> Oregon families from their homes, disproportionately impacting children of color and aging Oregonians. Our state that already suffers from a shortage of affordable housing; this cruel proposal needlessly exposes more families to risk of homelessness.

Causa recognizes that the proposed rule is a part of the current administration's coordinated attack on immigrant families.<sup>2</sup> We all share the concern that millions of U.S. households struggle to find

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<sup>1</sup> CBPP Analysis of 2017 HUD administrative data:

<https://www.cbpp.org/research/housing/demographic-data-highlight-potential-harm-of-new-trump-proposal-to-restrict-housing>

<sup>2</sup> See, e.g., NAT'L IMMIGRATION L. CTR., *Understanding Trump's Muslim Bans* (updated Mar. 8, 2019),

<https://www.nilc.org/issues/immigration-enforcement/understanding-the-muslim-bans/>; Michael D. Shear & Emily Baumgaertner, *Trump Administration Aims to Sharply Restrict New Green Cards for Those on Public Aid*, N.Y. TIMES (Sept. 22, 2018),

<https://www.nytimes.com/2018/09/22/us/politics/immigrants-green-card-public-aid.html>; Dan Lamothe, *Pentagon Will Shift an Additional \$1.5 Billion to Help Fund Trump's Border Wall*, WASH. POST (May 10, 2019),

[https://www.washingtonpost.com/national-security/2019/05/10/pentagon-will-shift-an-additional-billion-help-fund-trumps-border-wall/?utm\\_term=.37360e7cda10](https://www.washingtonpost.com/national-security/2019/05/10/pentagon-will-shift-an-additional-billion-help-fund-trumps-border-wall/?utm_term=.37360e7cda10); REUTERS, *Exclusive: Trump Administration Proposal Would Make It Easier to Deport Immigrants Who Use*

affordable housing in the ongoing nationwide housing crisis, but blaming struggling immigrant families will not fix this problem. Indeed, HUD’s own analysis of the proposed rule concludes that fewer, not more, families are likely to receive assistance as a result of the rule.<sup>3</sup> The real issue is the lack of sufficient funding to ensure that every family, regardless of immigration status, has access to one of the most basic of human rights—a safe place to call home.

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. If we want our communities to thrive, everyone in those communities must be able to stay together and get the care, services and support they need to remain healthy and productive.

Thank you for the opportunity to submit comments on the proposed rulemaking.

Andrea Williams

Executive Director

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*Public Benefits*, N.Y. TIMES (May 3, 2019), <https://www.nytimes.com/reuters/2019/05/03/us/politics/03reuters-usa-immigration-benefits-exclusive.html>.

<sup>3</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01 (Apr. 15, 2019).