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July 8, 2019

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 the Centro Hispano Daniel Torres Inc. We are a 501(c)3 serving the community of Reading, Pennsylvania. We primarily serve members of our community who are most in need of safety net services like housing. We are writing 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). Given the number of families that we serve daily that may be mixed status families and the harm that will be done to the families we serve if this proposal is adopted, we urge HUD to withdraw this rule.

At the Centro Hispano our mission is to enhance the acculturation of the Latino population in the Berks County and Greater Reading area through collaborative initiatives designed to enable individuals and families to improve their quality of life and the quality of life in their communities. The U.S. Census Bureau in June released new details about its 2018 population estimates. Berks' Latino population over that time grew 42%. The area's low cost of living and opportunities for employment have made it attractive for people who want to move here. This proposal will only harm families and will cause only more pain to families who want to contribute to our community. We cannot support policy that separate families. Statewide, the Latino population grew 36.7% between 2010 and 2018. Latinos now make up 23% of the population in Berks County.

HUD claims that this proposed rule is a way to reduce poverty and address the waitlist crisis faced by Public Housing Authorities nationwide; the Centro Hispano recognizes that the proposed rule is a part of the current administration's coordinated attack on immigrant families.

This proposal would harm 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 at mtoledo@centrohispano.org or at 610-685-1266 to provide further information.

Respectfully,

A handwritten signature in black ink that reads "Michael Toledo".

Michael Toledo
President & CEO