

June 20th, 2019

**Re:** HUD Docket No. FR-6124-P-01, RIN 2501-AD89 Public Comment in Response to Proposed Rulemaking: “Housing and Community Development Act of 1980: Verification of Eligible Status”

Dear Sir/Madam,

This letter is to formally comment on the proposed rule that would make changes to the implementation of the Department of Housing and Urban Development’s (HUD) section 214 of the Housing and Community Development Act of 1980. I respectfully submit these comments as Director at the Center for the Study of Immigrant Integration (CSII) at the University of Southern California, a research center focused on promoting immigrant integration through scholarship, data, and engagement.

The proposed change will affect a large proportion of immigrants and their loved ones all over the nation. The change will likely effect immigrants of all statuses and the U.S. citizens with whom they live. As a resident of Los Angeles County and Director of a center focused on these issues, a change in the eligibility requirements for assisted housing programs is especially important to my community. In fact, 3.6 million people— 36 percent of Los Angelenos— are foreign born and 58 percent of all children under 18 in LA County have at least one immigrant parent. Los Angeles is also home to many “mixed-status families,” whose lives should be taken into account. Of all LA County families, 16 percent are composed of at least one undocumented family member and another member that is a legal permanent resident or citizen. These numbers are from a December 2018 report by our researchers at Center for the Study of Immigrant Integration (and can be found in the attachment to this comment).

The danger of a policy change like the one proposed is that it also has the power to affect public health and safety for everyone in our communities. For example, an anti-immigrant policy such as this is likely to create fear among these populations and cause people to keep their families away from government agencies, and services for fear of jeopardizing themselves and revealing their status. This fear could prevent individuals from accessing assisted housing programs, jeopardizing family and housing stability, and placing families at risk of homelessness. Allowing immigrant communities safe and secure access to housing will enable them to participate and contribute to their families.

With approximately nine percent of America’s immigrants living in Los Angeles County, I have a special interest in this issue. LA County leaders recognize that providing opportunities, encouraging civic engagement, and being open to immigrants and all members of our communities, means healthier and safer communities for all. Communities across the country stand to benefit a great deal from having stable, thriving, and active immigrant community members more fully integrated into social and economic life. A shift in the eligibility requirements of these assisted housing programs as proposed by this rule will complicate immigrant integration efforts – and it will reaffirm exclusion and difference at a time when inclusive and common ground are key. The concerns about rule changes raised by immigrant advocates, local leaders, research centers, and housing experts in Los Angeles and around the country are well founded, and should be given due consideration in the debates ahead.

Sincerely,

A handwritten signature in blue ink, appearing to be the initials 'RS' or similar, written in a cursive style.

Manuel Pastor  
Distinguished Professor, Sociology/American Studies & Ethnicity  
Turpanjian Chair in Civil Society and Social Change  
Director, Program for Environmental and Regional Equity  
Director, Center for the Study of Immigrant Integration