



July 9, 2019

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

To Whom It May Concern:

On behalf of the Educare Learning Network, we are writing to express our strong opposition to the Department of Housing and Urban Development's (HUD) proposed rule 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). We urge the rule to be withdrawn in its entirety, and that HUD's long-standing regulations remain in effect.

Educare is dedicated to advancing high quality early education programs and services and the policies that support them. We do this through our national network of 24 early learning schools in 15 states and the District of Columbia; field-building professional development and research initiatives; and federal, state and local advocacy efforts. Our schools are first and foremost center-based Early Head Start and Head Start programs, collectively serving more than 3,800 infants, toddlers, preschoolers, and their families, and driving professional development for more than 1,000 early childhood staff. While many Educare schools are based in urban locations, some schools are located in suburban and also rural communities. This geographic diversity corresponds with a diverse racial and linguistic makeup of students, families, and staff from different backgrounds. The Network's evidence, practice expertise and dynamic partnerships are directed toward our mission of demonstrating that research-based, comprehensive early childhood education can promote the school readiness and healthy development of our nation's most underserved young children and their families.

With experience serving communities with large immigrant populations, Educare is especially well-attuned to the hardship and concerns immigrant families face. With this context in mind, the Educare Learning Network is deeply concerned that the proposed rule would place thousands of immigrant families at risk of homelessness, jeopardizing their family and housing stability, both of which are critical to getting young children and their families on a pathway to self-sufficiency and better life outcomes.

Moreover, the proposed rule threatens to undermine the well-being of young children and their families. The rule would force mixed immigrant status families to make an impossible decision—either break up to allow eligible family members to continue receiving assistance or forgo the subsidies so that the families can stay together. Family separations undermine family stability, and leads to toxic stress, trauma, and attachment issues in young children. Even a temporary separation has an enormous negative impact on the health and educational attainment of children later in life, and many parents struggle to restore the parent-child bond once it has been disrupted by a separation. Research has also shown that economic and housing instability impedes children's cognitive development, leading to poorer life outcomes as adults. Housing instability is directly correlated to decreases in student retention rates and contributes to homeless students' high suspension rates, school turnover, truancy, and expulsions, limiting students' opportunity to obtain the education they need to succeed later in life.

Although HUD contends that the proposed rule is a means of addressing the waitlist crisis faced by a majority of Public Housing Authorities nationwide, the Educare Learning Network recognizes the proposed rule's implications and how it can substantially harm immigrant families. We share the concern that millions of U.S. households struggle to find affordable housing in the ongoing nationwide housing crisis, but placing significant burden to 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.



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.

As we stated above, we urge HUD to immediately withdraw its current proposal, and dedicate its efforts to advancing policies that strengthen—rather than undermine—the ability of young children and their immigrant families to thrive and receive the housing, care, services and support they need to remain healthy and productive. Thank you for your consideration of the Educare Learning Network’s comments. For more information about our comments, please contact Margie Wallen, Vice President, National Policy, Ounce of Prevention Fund, 33 W. Monroe Street, Suite 1200, Chicago, Illinois 60603, [mwallen@theounce.org](mailto:mwallen@theounce.org).

Sincerely,

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