



Submitted via www.regulations.gov

Office of General Counsel, Rules Docket Clerk
Department of Housing and Urban Development
Regulation Division
451 7th Street SW, Room 10276
Washington, DC 20410-0500

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

Dear Sir/Madam:

I am writing on behalf of Abode Communities in opposition to the Department of Housing and Urban Development's (HUD) proposed rule 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). If implemented, the rule would result in the displacement of thousands of families across the country and disproportionately affect California residents. Furthermore, contrary to the administration's claim, the proposed rule is unlikely to reduce the waiting list for assisted housing programs and instead, due to expected costs associated with its implementation, could reduce overall housing quality and assistance. **We urge the rule to be withdrawn in its entirety.**

Abode Communities is a nonprofit social enterprise headquartered in Los Angeles, California. We have developed over 8,000 affordable homes for low income families with children, seniors and individuals throughout Southern California. Our residential communities are home to hard working people who have struggled with housing instability due to the high cost of housing in our region. Living in high quality affordable housing provides our residents with the opportunity to thrive and experience greater self-sufficiency and economic mobility.

California is in the midst of a crushing housing affordability crisis and this proposed rule does not address the underlying causes of this crisis nor expand the availability of housing units. HUD's own analysis indicates the rule would cost the government at least \$193 million more each year. As a result, HUD predicts "there could be fewer households served under the housing choice vouchers program." Additionally, for public housing complexes, there would be a negative impact on the quality of service, maintenance of units, and possible vacancies. This reduction of housing units and quality would only exacerbate the ongoing homelessness crisis in many of our communities.

Existing law already prohibits ineligible immigrants from receiving federal housing assistance. However, for over two decades, the Department has allowed mixed-status families – households whose members have different citizenship and immigration statuses – to live in subsidized housing provided at least one person is an eligible resident or citizen. By limiting federal housing assistance only to families in which every member is an eligible resident and citizen, the proposed rule could result in the displacement of 25,000 households nationwide, of whom *over 9,000 reside in California* and all are U.S. citizens or residents.

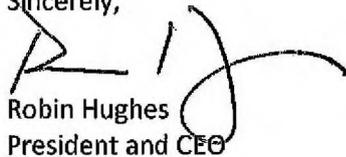


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We urge HUD to immediately withdraw its current proposal, and dedicate its efforts to advancing policies that strengthen—rather than undermine—the ability of immigrants to support themselves and their families in the future. If we want our communities 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.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robin Hughes', with a large, stylized flourish extending to the right.

Robin Hughes
President and CEO

