



July 9, 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

To Whom It May Concern,

On behalf of Compass Family Services, we urge the U.S. Department of Housing and Urban Development to withdraw the proposed changes regarding “verification of eligible status” to prohibit mixed-status families from living in subsidized housing. HUD’s proposal was published in the Federal Register on May 10, 2019 (RIN 2501-AD89; HUD Docket No. FR-6124-P-01). We strongly oppose this rule and request that HUD’s long-standing regulations remain in effect.

For more than 100 years, Compass Family Services has been helping homeless families and those at imminent risk in San Francisco to achieve housing stability, economic self-sufficiency, and family well-being. Through various programs and services, Compass works to help families obtain and maintain permanent housing and provides comprehensive support in areas including childcare, mental health, and substance abuse counseling. A number of the clients we serve are immigrant families and many live in mixed-status homes; therefore, our clients would be severely and negatively impacted by the proposed rule. Additionally, as service providers, under this proposed regulation we would be unable to perform our duty to provide important care and housing stability to those who desperately need assistance – including U.S. citizens.

As a family-oriented service provider, Compass supports the deeply American values of welcoming immigrant families into our communities and preserving the sanctity of family unity. The presented rule unjustly punishes mixed-status families by disallowing families the ability to exercise their federal right to access subsidized housing and hurts U.S. citizens as well as undocumented members of our community. This ultimately leads families to an impossible choice: being torn apart or becoming homeless.

Housing assistance programs offer much needed support and relief for children and families struggling with economic hardship, but the mixed-status rule stands to undercut the goals of these programs by forcing high-need families to decide between staying together or losing their homes.

The proposed regulation is part of the Trump Administration's broader agenda to drastically reshape our legal immigration system, redefine who is “worthy” of being able to access housing,



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and profoundly alter what we look like as a country. If this rule becomes enacted, no longer would we serve as a beacon for the world's dreamers and strivers. Penalizing immigrants and their families for seeking an affordable roof over their heads is the antithesis of patriotism. It is prejudice, inhumane, and fundamentally un-American. Compass Family Services strongly urges the withdrawal of the "mixed-status" rule.

Regards,

Compass Family Services