

## *Emergency Shelter Assessment Committee*

June 19, 2019

Office of the General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 Seventh Street SW, Room 10276  
Washington, DC 20410-0001

RE: Proposed Rule: FR-6124-P-01 Housing and Community Development Act of 1980: Verification of Eligible Status

Dear Office of the General Counsel, Rules Docket Clerk:

I am writing on behalf of the Emergency Shelter Assessment Committee (ESAC), which voted unanimously to submit public comments in opposition to HUD's Proposed Rule: FR-6124-P-01 Housing and Community Development Act of 1980: Verification of Eligible Status. ESAC is a collaborative of service providers, consumers, local and state governmental representatives, advocates, and other interested community members working to ensure the safety and well-being of people who are homeless in Portland. Through planning, coordination, and advocacy, we promote a continuum of care and support for individuals experiencing homelessness. The United Way and City of Portland initiated this group in 1987 to act primarily in an advisory capacity.

ESAC does not support any policies or rule changes that would increase homelessness and it appears, by HUD's own calculation, that this rule change would do exactly that.

These proposed rules would prohibit U.S. citizens and eligible immigrants from receiving federal housing assistance if they share a home with an immigrant family member who's ineligible due their immigration status. The proposed rule also specifies that individuals who are not in eligible immigration status may not serve as the leaseholder, even as part of a mixed family whose assistance is prorated based on the percentage of members with eligible status – a practice that has been in place for more than two decades.

The current rule allows for mixed-status families; under this new rule, every member of the household must be verified to be of eligible immigration status. By HUD's own calculation, this rule could displace more than 55,000 children, all of whom are legal U.S. residents or citizens. According to HUD, approximately 25,000 households, representing about 108,000 people, now living in subsidized housing have at least one ineligible member. This rule change would have devastating effects on people living in poverty, with the overwhelming majority of people facing eviction being children.

Federal rental assistance is what allows people living in poverty, including people with disabilities, seniors, children, and people experiencing homelessness, to attain and retain housing. In Maine 52,700 people in 33,000 households rely upon federal rental assistance, 76% of whom are seniors, children, or people with disabilities. This rule could result in the eviction of tens of thousands of people nationwide, including thousands of children, immediately sending them into homelessness. Maine's shelters are already at or exceeding capacity; this rule change could create a homelessness crisis, specifically for families with children, which no community in Maine is equipped to face. It helps none of us to make people, *especially children*, homeless. It has been proven redundantly through numerous cost studies that housing is far less expensive than keeping people homeless. Rule changes that increase hardships for people experiencing poverty are not helpful to them or to any of us.

*A Collaborative of Services Providers, Community, and Health & Human Services Agencies  
whose Primary Objective is to Ensure the Safety and Well-Being of Portland's Homeless.*

## *Emergency Shelter Assessment Committee*

This rule change goes against HUD's mission and the mission of ESAC, and for that reason, ESAC strongly opposes the Housing and Community Development Act of 1980: Verification of Eligible Status rule change.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Geyer', with a long horizontal flourish extending to the right.

Aaron Geyer  
ESAC Co-Chair