



California Association of Food Banks
1624 Franklin Street, Suite 722
Oakland, CA 94612
(510) 272-4435 | cafoodbanks.org

July 9th, 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

Dear Sir/Madam:

I am writing on behalf of the California Association of Food Banks in response to the Department of Housing and Urban Development's (HUD) proposed rule to express our strong opposition 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). The California Association of Food Banks strongly opposes this proposed rule, which would increase hunger and hardship for California's low-income immigrant families and increase the need for low-income communities to access nutrition assistance through SNAP and food banks statewide. We urge the rule to be withdrawn in its entirety, and that HUD's long-standing regulations remain in effect.

The California Association of Food Banks represents 41 food banks and 6,000 charitable partners working to end hunger in California. Every day, we stand on the front lines of hunger and see the challenges low-income Californians face to afford food and make ends meet. Yet, as hard as we work to help those struggling with hunger in our communities, we could never meet the need without federal nutrition programs like SNAP and other safety net programs that help low-income Californians meet their basic needs.

SNAP is the nation's most important anti-hunger program, [reaching approximately 40 million low-income Americans](#), including nearly [4 million Californians](#). SNAP (CalFresh in California) is our state's

first line of defense against hunger and is a critical intervention to reduce hunger and poverty. Federal anti-hunger programs are essential to preventing hunger and some of the worst outcomes of poverty. In fact, [for every meal that charity provides, SNAP provides 12](#). Yet, because SNAP benefits are inadequate to last the entire month, [nearly 1 in 3 households still rely on food banks to make ends meet](#) and food banks are already struggling to meet the current need. If enacted, the proposed rule would increase poverty, hardship and hunger, by forcing families to choose between a safe place to live and keeping their families together.

[California has one of the highest poverty rates in the nation](#), grappling with near crisis levels of hunger and poverty. According to the latest data, [11.8 percent of U.S. households \(15 million households\)](#)—were food insecure last year. Combined with the state’s high cost of living, California’s low-income families, particularly our state’s immigrant families and communities of color, are disproportionately burdened by food insecurity, poverty and hunger. Poverty and food insecurity are closely linked and California’s Latino community is disproportionately burdened by food insecurity. Latino households experience food insecurity at higher rates than white households—even surpassing the state average. Moreover, despite overall declines in California’s food insecurity rate, the proposed rule would only serve to further entrench the challenges of poverty, food insecurity and hunger on our state’s low-income families and immigrant communities statewide.

The proposed rule places tens of thousands of immigrant families at risk of homelessness, jeopardizing their family and housing stability, both of which are critical to getting families on a pathway to self-sufficiency and better life outcomes. If the proposal moves forward, more than 25,000 families, including 55,000 children eligible for housing assistance will be forced to choose between losing their housing and keeping their families together. In fact, new analysis from the [Center on Budget and Policy Priorities](#) finds that the proposed rule would jeopardize rental assistance for families in every state. Under the proposed rule, California would be disproportionately impacted by threatening rental assistance for an estimated 936,830 Californians of which 846,670 are U.S. citizens.

The proposed rule threatens to undermine the well-being of low-income U.S. citizens, immigrants, and their families. The rule would force mixed 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 children. Even a temporary separation has an enormous negative impact on the health and educational attainment of these children later in life, and many parents struggle to restore the parent-child bond once it has been disrupted by a separation.

However, since 70% of mixed status families currently receiving HUD assistance are composed of eligible children and at least one ineligible parent, it is likely that these families will forgo the subsidies to avoid separation. These outcomes will not only hurt families while they struggle to find housing in the short term, but will also lead to reduced opportunities and increased health problems for these families in the long term. Studies have shown that unstable housing situations can cause individuals to experience increased hospital visits, loss of employment, and are associated with increased likelihood of mental health problems in children, and can dramatically increase the risk of an acute episode of a behavioral health condition, including relapse of addiction in adults. Having safe and stable housing is crucial to a person's good health, sustaining employment, and overall self-sufficiency. These effects will be particularly prominent in the children, nearly all of whom are U.S. citizens, in these mixed status families. Research has 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.

As we stated above, the proposed rule will hurt immigrant families and worsen poverty, hunger and hardship. 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. Thank you for the opportunity to submit comments on the proposed rulemaking.

Rachel Tucker



Senior Policy Associate

California Association of Food Banks

Andrew Cheyne



Director of Government Affairs

California Association of Food Banks

