



July 8, 2019

Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> Street SW, Room 10276  
Washington, D.C. 20410-0500

Re: HUD Docket No. FR-6124-P-01, RIN 25011-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 Campion Advocacy Fund to convey our strong opposition and concern 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 proposed rule is in direct conflict with our mission to ensure that everyone has a safe and stable place to live. As an organization working to end homelessness in Washington state and across the country, we know this proposed rule puts families and children at risk of experiencing homelessness and will add to the current severe housing shortage in our community.

Homelessness and housing instability are at record highs across Washington state, driven by the skyrocketing cost to rent or own a home. Over the last decade, rents have increased 30 percent<sup>1</sup>, resulting in Washington having the fifth highest prevalence of homelessness in the country. Despite a strong economy and growing incomes, families with lower incomes are not able to compete in our housing market and rely on federal housing programs. Although the Department of Housing and Urban Development (HUD) contends that the proposed rule is a means of addressing the waitlist crisis faced by a majority of Public Housing Authorities nationwide<sup>2</sup>, the Campion Advocacy Fund recognizes that the proposed rule is part of the current administration’s coordinated attack on immigrant families.

We all share the concern that millions of U.S. households struggle to find affordable housing, but blaming 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<sup>3</sup>. The real issue is a lack of sufficient funding to ensure that every family, regardless of immigration status, has access to a basic human right—a safe place to call home. Additionally, the proposed rule would mainly

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<sup>1</sup> Washington State Department of Commerce [2018 Homelessness in Washington State](#) report

<sup>2</sup> Tracy Jan, *Trump Proposal Would Evict Undocumented Immigrants from Public Housing*, Washington Post (4/18/29)

<sup>3</sup> HUD, *Regulatory Impact Analysis, Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01 (Apr. 15, 2019)

affect people of color, who are already at a higher risk of experiencing homelessness and currently make up a disproportionate percentage of the homeless population, thus making this rule a contributor to the vast racial inequities in our country.

The proposed rule threatens the health of children and will effectively evict over 55,000 children across the country who are eligible for the covered housing programs. Mixed status families will have to make difficult decisions to either face eviction or separate as a family in order to retain housing stability. Both options will have lasting impacts on child and family health.

As we stated above, this proposed rule will have devastating impacts on families in our community and further exacerbate our housing problem. In Washington state, as many as 170,000 people could lose their housing assistance if they are unable to produce documents verifying their citizenship under the new rule<sup>6</sup>. Over 89 percent of those Washingtonians affected are U.S. citizens.

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, we need to protect children and families from housing instability and homelessness.

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact me at 206-686-5310 with any questions or concerns.

Sincerely,

Sheila Babb Anderson  
Homelessness Program Director  
Campion Advocacy Fund  
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<sup>6</sup>Center on Budget and Policy Priorities analysis of 2017 HUD administrative data