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June 25, 2019

Regulations Division
Office of the General Counsel
Department of Housing and Urban Development
451 7th St SW
Room 10276
Washington, DC 20410-0500

Re: Docket No. FR-6124-P-01 60_Day Notice of Proposed Information Collection: Comment Request:
Housing and Community Development Act of 1980: Verification of Eligible Status

To Whom It May Concern:

The Akron Metropolitan Housing Authority (AMHA) appreciates the opportunity to provide comments to the proposed rule to the Housing and Community Development Act of 1980: Verification of Eligible Status public housing published on May 10, 2019. AMHA has reviewed the draft rule and has the following comments regarding the notice.

Akron Metropolitan Housing Authority (AMHA) strongly opposes the changes to HUD's Proposed Rule. HUD's argument for this proposed rule is that it would help U.S citizens and legal residents expedite their use of federal housing subsidies, ignoring the fact that its primary result would be the opposite: the termination of thousands of U.S citizens and legal residents, primarily innocent children who happen to be related to an undocumented individual in their home. AMHA believes that this conflicts with HUD's mission to provide decent, safe, and affordable housing to those communities in most need of such housing.

Mixed income families have been admitted into housing programs according to the rules that HUD established. To now subject vulnerable families to termination because of a reinterpretation of the law is unacceptable, and may subject PHA's to prolonged litigation and increased costs to the program. The proposed rule suddenly makes families ineligible for affordable housing through no fault of their own and would cause the displacement of 25,000 mixed-status families, including more than 55,000 children, all of who are legal U.S residents or citizens. In its own analysis, HUD admits that over 100,000 people would be evicted or terminated from assistance, a majority of who are children.

This rule would not save HUD or taxpayers' money, as housing assistance provided to mixed status families is prorated and non-citizens within eligible households are not subsidized. In fact, costs will



increase because of screening requirements on all household members at recertification, tracking of families and the need to follow through on evictions and terminations. In fact, because subsidy to mixed-status households is pro-rated, displacing such households in favor of households with uniform eligibility will actually increase HUD's subsidy cost per unit. There would also lead to additional costs for unit turns and administrative costs for releasing the units. The covered programs would then serve fewer families as program costs rise.

Like many Rust Belt cities, Akron was hit hard when the manufacturing jobs -- especially in the auto and tire making industries -- started disappearing in the early 2000s. Once the jobs were gone, the population started shrinking. However, in recent years a growing number of immigrants have started moving in. Between 2007 and 2013, Akron's foreign-born population increased, helping to stem what could have been a devastating population decline. In fact, immigrants have bolstered Akron's community. The new arrivals have kept Akron's working population young as the city's aging baby boomers retire. Many of them are working in science, technology, engineering and math (STEM) jobs or they are opening businesses -- and creating jobs. Immigrants may have required some assistance when they first arrived, but they typically get jobs after a few months and do not have to rely on the benefits for long. According to research by the Cato Institute, low-income immigrants use public benefits like Medicaid or food stamps at a much lower rate than low-income native-born citizens do.

Housing is a human right and more affordable housing needs to be created to ensure all families can thrive in our city and our country. I appeal to the U.S. Department of Housing and Urban Development to withdraw this proposed rule because of its harmful impact to our residents, staff, housing authorities and communities. Thank you for the opportunity to comment on the changes to the proposed rule. Please feel free to contact me with any questions.

Sincerely,



Brian Gage
Executive Director

