



AFFORDABLE HOUSING ALLIANCE
CONNECTICUT

Formerly known as the Connecticut Housing Coalition

Leading Connecticut's housing industry in growing affordable and equitable communities.

July 9, 2019

Office of the General Counsel
Rules Docket Clerk
U.S. Department of Housing and Urban Development
451 7th Street, SW, Room 10276
Washington, D.C. 20410-001

Docket No. FR-6124-P-01, Housing and Community Development Act of 1980:
Verification of Eligible Status

Dear Rules Docket Clerk:

I am writing on behalf of the Affordable Housing Alliance of Connecticut (formerly Connecticut Housing Coalition) to comment on HUD's proposal to amend its regulations implementing section 214 of the Housing and Community Development Act of 1980. These proposed regulatory changes would require the verification of eligible immigration status for all recipients of assistance under a covered program who are under the age of 62.

Affordable Housing Alliance Connecticut strongly opposes this proposal and urges HUD to withdraw the rule in its entirety and allow HUD's long-standing regulations to remain in effect.

Affordable Housing Alliance Connecticut is a statewide nonprofit representing a wide-ranging, vibrant network of community-based affordable housing activity across the state. Our more than 1,000 members include nonprofit developers, human service agencies, resident associations, and diverse other housing practitioners and advocates. Founded in 1981 as the Connecticut Housing Coalition, the Alliance's mission is to lead Connecticut's housing industry in growing affordable and equitable communities. HUD's instituting this change in regulation is supposedly meant to relieve the waitlist crisis experienced by public housing authorities throughout the country would increase inequity throughout our state. It is clear that this separation policy will do nothing to address the waitlist crisis, and could lead to the eviction of more than 100,000 people, including more than 55,000 children who are U.S. citizens or have legal status.

Families of mixed status are predominantly made up of children who are U.S. citizens and one or more parent who is an immigrant. Those who choose to keep their families together rather than break them up, in most cases, will be forced to look for affordable

housing in Connecticut's cities and towns where affordable housing is already inaccessible. Recent statistics released by the National Low Income Housing Coalition estimate that Connecticut has a short fall of approximately 80,000 affordable units for low- and moderate-income households. More than likely, more mixed status families in Connecticut will become homeless because of these rule changes.

In addition, Affordable Housing Alliance Connecticut is concerned about the effect of such rule change on HUD's ability to perform under already burdensome conditions. It was apparent in New England and perhaps all of the east coast that the numbers of HUD staff have been cut to a level where they were unable to contend with the response needs after Hurricane Maria and other natural disasters to which they had to respond in the past few years. Implementation of these new requirements will place an undue burden on an agency already struggling with an affordable housing crisis and underfunding. For these reasons, and others, we respectfully urge the Department to withdraw this proposed rule. Thank you for considering our comments. If you should have any questions, please contact me at 860.563.2943, ext. 12 or Florence@ct-housing.org.

Sincerely,

A handwritten signature in cursive script that reads "Florence Villano". The signature is written in black ink and is positioned above the typed name and title.

Florence Villano
Executive Director