



June 14, 2019

Submitted via www.regulations.gov

Andrew Hughes, Chief of Staff
Office of the Secretary
U.S. Department of Housing and Urban Development (HUD)
451 Seventh Street SW
Washington, DC 20410

Re: Docket ID: HUD-2019-0044- Public Comment Opposing Proposed Changes to Housing and Community Development Act of 1980: Verification of Eligible Status, Posted 05-10-2019; 5 CFR 5

I am writing on behalf of the Los Angeles Center for Law and Justice (LACLJ) in strong opposition to HUD's proposed "mixed-status family" rule. The proposed rule will cause more than 100,000 people to be evicted from their homes, including more than 55,000 children who are U.S. citizens or have legal status. A significant number of these families include individuals and children who trying to rebuild their lives after being seriously impacted by domestic violence. These children will be further traumatized if they are separated from their families or forced to become homeless to remain with their non-citizen family members.

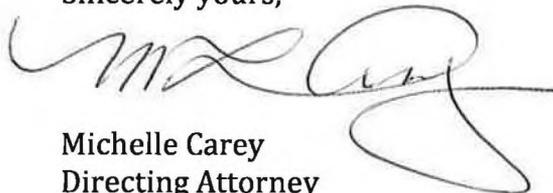
LACLJ is a non-profit organization which has been providing culturally competent free legal services to low-income residents of Los Angeles and their families for over 40 years. LACLJ's mission is to secure justice for survivors of domestic violence and sexual assault and empower them to create their own future. LACLJ's immigration work supports survivors of trauma in obtaining stability by representing them in their VAWA, U non-immigrant status, T non-immigrant status, Special Immigrant Juvenile Status, and Adjustment of Status petitions, among others. LACLJ has represented hundreds of individuals who have applied for immigration relief based on having survived domestic violence, sexual assault, human trafficking, abuse, abandonment, neglect, and/or other violent crimes. LACLJ can thus speak to the extreme difficulty the proposed HUD rule will bring to the particularly vulnerable segment of the immigrant community we serve, namely undocumented survivors of violence. LACLJ staff has witnessed how the ability to obtain federally-subsidized housing has improved the long-term stability of the families we serve and kept them from returning to an abusive situation. Access to affordable housing is critical to ensuring long-term safety and stability for these families, particularly when considering that we live in a city that is experiencing a serious housing shortage and homelessness crisis.

Domestic violence survivors already face significant barriers to obtaining and maintaining housing after they leave an abusive relationship. These include economic instability and discrimination due to the violent acts of their abuser that often occur where the survivor lives. In fact, domestic violence is a primary factor that causes women to become homeless in our communities. The proposed rule creates another significant barrier for survivors who live in mixed-status families, which are common in our local community and throughout California. Fifty-eight percent (58%) of children in Los Angeles County, and nearly half of all children in California, live with foreign-born parents (U.S. Census Bureau, American Community Survey, Oct. 2017). Moreover, with half of all unsheltered Americans living in California, our state is also facing an unprecedented housing shortage and homelessness crisis.

The proposed “mixed-status families” rule creates an additional barrier for immigrant communities and vulnerable individuals, and would cause a significant additional burden on communities, federal agencies, and service providers. This rule also forces low-income and vulnerable families to choose between breaking up their family and foregoing critical housing assistance, the loss of which could cause them to become homeless. The rule does nothing to help prevent undocumented immigrants from receiving federal housing assistance, as the law already prohibits undocumented immigrants from accessing these subsidies. In fact, the list of “ineligible” immigrants under the proposed mixed-status rule includes people with legal immigration status, such as domestic violence survivors who were granted legal status after they cooperated with law enforcement in bringing their abuser to justice.

The only purposes served by the proposed rule are to increase fear among immigrant communities, to unfairly penalize vulnerable families and children, and to intensify an already critical housing and homelessness crisis in communities throughout our nation. For these reasons, we ask that HUD immediately withdraw this cruel and counterproductive rule.

Sincerely yours,



Michelle Carey
Directing Attorney
Los Angeles Center for Law and Justice