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July 3, 2019

Office of the General Counsel, Rules Docket Clerk
U.S. Department of Housing and Urban Development
451 7th Street, SW, Room 10276
Washington, DC 20410-0001

**RE: (HUD) Proposed Rule: FR-6124-P-01 Housing and Community Development Act of 1980:
Verification of Eligible Status**

To Whom It May Concern:

In May 2019, the Department of Housing and Urban Development (HUD) published a proposed rule in the Federal Register titled "Housing and Community Development Act of 1980: Verification of Eligible Status." If implemented, the proposed rule would not allow mixed-immigration-status families from receiving prorated subsidies for housing from HUD. The Allentown Housing Authority serves approximately 2,700 families in the City of Allentown, PA, and surrounding area.

On behalf of the AHA, our residents and the community I am submitted comments regarding the above referenced Federal Register Notice that would make changed to HUD's regulations implementing Section 214 of the Housing and Community Development Act of 1980, as amended. This proposed rule is unnecessary and would have negative consequences, separating families and further exacerbating child poverty and homelessness.

The proposed rule is unnecessary as current law and regulations do not permit families with mixed immigration status to receive federal subsidies. Subsidies for mixed immigration status are prorated and reduced for each family member determined not to be eligible, due to their immigration status. Information provided by residents is verified through Systematic Alien Verification for Entitlements (SAVE) Program, to insure subsidies do not go to ineligible individuals. The Regulatory Impact Analysis completed by HUD, dated April 15, 2019, indicates implementation will disproportionately impact families with children.

We urge the withdrawal of the proposed rule in its entirety and request the Administration and Congress provide adequate funding to ensure every family who is eligible for HUD assistance has access to affordable housing.

Under the proposed rule, Housing Authorities will have to collect and verify additional immigration information from residents and applicants. Current systems in place to collect and verify information are not set up through HUD or Immigration and Naturalized Services. We are concerned about the increased administrative costs as the Housing Choice Voucher Administrative Fee and the Public Housing Operating Subsidy are chronically underfunded. In addition, we would be required to initiate eviction

actions against families living in public housing and terminate Housing Choice Voucher participants. Both actions are subject to grievance hearings and evictions require approval of the courts. HUD's impact analysis, referenced above, estimates the cost per household at \$3,000.

This proposed rule does not promote strong, sustainable and inclusive communities. It does nothing to address the critical shortage of affordable housing here in Allentown or across the nation. It will not reduce the number of applicants who wait years in many instances on our waiting list. We ask that the proposed rule be withdrawn.

Sincerely,
Allentown Housing Authority

A handwritten signature in blue ink, appearing to read "Daniel Farrell", with a stylized, cursive script.

Daniel Farrell
Executive Director