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June 15, 2019

Dr. Benjamin S. Carson, Sr., M.D.
Secretary
Department of Housing and Urban Development
451 Seventh Street SW, Room 10276
Washington, DC 20410-0001
ATTN: Office of the General Counsel; Rules Docket Clerk

Re: Proposed Rule Re. Housing and Community Development Act
of 1980: Verification of Eligible Status (Docket No. FR-6124-P-01)

Dear Secretary Carson:

On behalf of Union Settlement, I am writing to express our strong opposition to the proposed rule regarding eligibility for recipients of housing assistance, which would make prorated assistance a temporary condition pending verification of eligible status, as opposed to the current regulation where prorated assistance could continue indefinitely.

Union Settlement is the oldest and largest social service provider in East Harlem, and offers a broad range of education, wellness and community-building programs to the community. Established in 1895, Union Settlement's services include early childhood education, youth afterschool and summer programs, college prep, job readiness, adult education, mental health counseling, senior centers, Meals on Wheels, small business development and more. Union Settlement assists over 10,000 individuals every year from more than a dozen locations in East Harlem, and our programs are designed to support the needs of every generation and culture.

East Harlem, which has a population of about 125,000 individuals, has one of the highest concentrations of public housing in the country. One-third of the housing units in East Harlem are in New York City Housing Authority (NYCHA) developments, and almost 50% of the population resides in either public housing or some other form of subsidized housing. Union Settlement works closely with NYCHA residents every day – we operate five early childhood education centers, four senior centers and three community centers in eight different NYCHA developments in this neighborhood.

Based on our experience, we strongly urge HUD to drop the proposed changes to the eligibility standards, and maintain the existing standards in order to protect immigrants and their families from discriminatory practices. As you know, HUD currently allows so-called "mixed families" (families comprised of members who are of different citizenship status) to live together in subsidized housing, even if one or more of the family members is an ineligible immigrant, by prorating the subsidy for the household.

If prorated assistance becomes conditional based on immigration status, these families would be made to choose between eviction and forced family separation, which HUD's own analysis termed a "ruthless" option. This proposed rule is a direct attack on immigrant families, as it would target, and most likely displace, about 2,800 immigrant families in New York City who live in public housing or receive rental subsidies.

This displacement would deeply disrupt the fabric of those communities and put thousands of New Yorkers at risk of homelessness. In total, about 11,400 people in New York City could be evicted from their homes, including about 4,900 children. Nationwide, more than 108,000 people would be affected in some of the nation's most expensive and difficult-to-navigate housing markets, including California, Texas, and New York.

Moreover, the consequences of this shift in policy would extend far beyond the families that are directly affected. In particular, this proposed change would cause families — rightfully fearful of the way this change will impact them — to leave their homes, likely risking homelessness or entering into their City's shelter system.

This proposed rule also has negative economic implications for New York and for the federal government. HUD's own analysis found that shelter subsidies for families facing homelessness after being evicted from subsidized housing could cost taxpayers far more. Estimates for the cost of shelter subsidies would be between \$20,000 and \$50,000 per person, making it clear that the Administration is choosing to make an example of immigrant families at great cost to the taxpayers.

Despite HUD's reasoning that this rule would help "lawful citizens" while the nation is in the midst of a housing crisis, the facts do not support such an argument. Because the families that will be affected by this rule change pay prorated rents, the families that replace them would require higher subsidies, meaning the same dollars would not go as far. According to HUD's estimates, it would cost the government as much as \$227 million a year to house the same number of people once this rule went into effect. A more effective use of taxpayer dollars would be to simply build more public housing and fund more housing choice vouchers with those same funds.

Deliberately suppressing immigrants from accessing public housing subsidies will have a detrimental impact on our country's social, political, and economic well-being. In coalition with other stakeholders from across the country, we join in calling on HUD to represent the interests of all American residents by withdrawing this proposal, and thereby protecting immigrants and our communities from the harmful effects noted above.

Sincerely,



David Nocenti
Executive Director