



July 2, 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: [DOCKET NO. FR-6124-P-01, RIN 2501-AD89]: HOUSING AND COMMUNITY
DEVELOPMENT ACT OF 1980: VERIFICATION OF ELIGIBLE STATUS**

To Whom It May Concern:

The North Central Regional Council (NCRC) of the National Association of Housing and Redevelopment Officials (NAHRO) is a membership organization serving as a catalyst for ethical leadership, professional development and legislative advocacy in the affordable housing and community development industry. NCRC represents approximately 800 Public Housing Authorities in the states of Illinois, Indiana, Iowa, Michigan, Minnesota, Nebraska, Ohio and Wisconsin. In our eight-state region, we serve about 823,00 families through the Section 8 Housing Choice Voucher and Public Housing program.

NCRC is submitting comments regarding the above referenced Federal Register Notice concerning the proposed rule that would make changes to HUD's regulations implementing Section 214 of the Housing and Community Development Act of 1980 as amended. This proposed rule would have negative consequences, separate families and further exacerbates child poverty and homelessness.

NCRC opposes HUD's proposed rule as it attempts to change the process of determining how to provide rental subsidy to "mixed families," which are households comprised of individuals both with and without eligible citizenship status. The Department's current regulation, codified by existing law, already prohibits rental assistance to ineligible noncitizens. Instead, it allows mixed family households to reside in assisted housing under a reduced, pro-rated rent calculation, which excludes the ineligible family member from the calculation. This approach effectively ensures that the ineligible household member does not receive housing subsidy.

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

Impact to Families in our Region

U.S. citizens and individuals 62 years of age or older who are not able to provide proof of citizenship and immigration status will face losing their assistance and could become homeless.

Over 9,600 households receiving assistance in the states of Illinois, Indiana, Iowa, Michigan, Minnesota, Nebraska, Ohio and Wisconsin include an elderly immigrant who is eligible for HUD rental assistance. Elderly

people are less likely to have the documents needed to verify their status, putting them at risk of losing their homes if the rule were to go into effect.

As many as 29,000 served in our eight- state region, could lose their housing assistance if they are unable to produce documents verifying their citizenship under the new rule. The proposed rule would cause these mixed households to lose their homes and many would likely fall into homelessness.

Impact on the Public Housing Authorities

Under the proposed rule, Housing Authorities will have to collect and verify additional immigration information from tenants and applicants. Current systems in place to collect and verify information are not set up through HUD or Immigration and Naturalized Services. NCRC is concerned about the increased administrative costs as the Housing Choice Voucher Administrative Fee and the Public Housing Operating Subsidy have been underfunded for years. In addition, Housing Authorities will also be required to evict families living in Public Housing and terminate Section 8 Housing Choice Voucher participants. Both actions require the Housing Authority to conduct a grievance hearing and eviction requires approval of the courts. HUD's impact analysis estimates the cost per household at \$3,000.

This rule does not promote strong, sustainable and inclusive communities nor does it address the national affordable housing crisis. Forcing our nation's elderly, children and most vulnerable into homelessness does not solve any housing issues, rather it increases new ones and would likely end up costing our country more in homeless services. NCRC asks that the proposed rule be withdrawn.

Sincerely,



Jennifer Keogh
President
North Central Regional Council of NAHRO