

July 5th, 2019

Mr. Paul Compton
Office of the General Counsel
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, D.C. 20410-0500



RE: Reaching Home Campaign comments on Docket No. FR-6124-P-01

Dear Mr. Compton

On behalf of the Reaching Home Campaign, the Partnership for Strong Communities and Center for Children's Advocacy submit the following comments regarding the U.S. Department of Housing and Urban Development's proposed changes to section 214 of the Housing and Community Development Act of 1980: *Verification of Eligible Status* as issued on May 10, 2019, Federal Register (Docket No. FR-6124-0-01). The Reaching Home Campaign (Reaching Home) is the statewide campaign to end homelessness in Connecticut comprised of over 200 partners across 120 organizations.

Partnership for Strong Communities (PSC) is a statewide nonprofit policy and advocacy organization dedicated to ending homelessness, expanding the creation of affordable housing, and building strong communities in Connecticut. We staff and manage the Reaching Home Campaign, serving as the backbone organization for the statewide efforts to end homelessness. Reaching Home advances strategies that will enable us to end homelessness among key populations: Veterans, individuals experiencing chronic homelessness, families with children and youth. The Center for Children's Advocacy is a nonprofit law firm, established in 1997, that provides legal representation and advocacy for the poorest, most at-risk children and youth in Connecticut. The Center advocates for children and youth affected by abuse and neglect, racial injustice, educational inequities, immigration, youth homelessness, juvenile justice, and a lack of access to medical and mental health care.

Reaching Home strongly opposes the proposed rule, which will restrict households with immigrant family members from receiving federal housing assistance. The proposed rule would negatively impact vulnerable Connecticut families, seniors, and individuals who are currently unstably housed and at risk of experiencing homelessness.

In 2018, Connecticut was home to over 95,000 extremely low-income households, meaning that these households were paying over 50% of their income on rents, and was ranked the 9th highest housing wage in the United States.¹ Approximately 103,000 low-income households receive publicly supported housing, 38.7% are headed by seniors and 33.6% of all publicly assisted households' residents are children.

The proposed change, according to the Center on Budget and Policy Priorities, has the potential to impact over 74,000 Connecticut households that are receiving HUD rental assistance, many of whom are U.S. Citizens and legal permanent residents.² The proposed rule change would make mixed status families automatically ineligible

¹ Partnership for Strong Communities, Housing in CT 2019 <http://www2.pschousing.org/files/2019%20HousinginCT%20FINAL.pdf>

² Center on Budget and Policy Priorities analysis of 2017 HUD administrative data https://docs.wixstatic.com/ugd/d97bc4_c0832bfe7d804ec499a2fdcc8fb9de3a.pdf

for federal housing assistance, and force those who are currently residing in public or subsidized housing to choose between losing their housing assistance and facing potential homelessness or forcing a member of their family out of their home and into potential homelessness. In addition, this rule would further proliferate fear, thus preventing more families who are legally entitled to federal housing assistance from applying. Furthermore, this would lead to fewer households being served and higher costs. According to HUD's analysis, the new policy may reduce the number of families being served through HUD's rental assistance program and may increase the cost of subsidies from \$193 to \$227 million annually, meaning that Congress will have to allocate additional resources for Public Housing and Housing Choice Voucher programs to serve fewer households.³

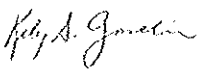
One client of the Center for Children's Advocacy who would be affected by this proposed change is David (pseudonym), a 16 year old boy who lives in Connecticut with his US Citizen grandparents. David lives with his grandparents because he suffered from neglect and abandonment at the hands of his parents. He is also undocumented. He had nowhere else to turn. Because his grandparents live in federally subsidized housing, under the proposed rule he would be ineligible to live with them- the only family he knows.

Over the past couple of years, Connecticut has made tremendous strides towards our effort to prevent and end homelessness. The number of individuals experiencing chronic homelessness has dropped by 75% since 2014 and family homelessness decreased by 18% from last year.⁴ This new rule would put 180 families who receive HUD rental assistance at risk of homelessness or force them to separate from their families because they live with an immigrant who is ineligible for HUD assistance.⁵ This is not only inhumane, it is bad public policy that will harm children and families and our communities.

If this new proposed rule goes into effect, many mixed low-income households may not only be removed from their homes but may never access the public housing benefits to which they are legally entitled and desperately need, thereby creating increased housing instability and homelessness. As a state and nation, we aim to ensure that every individual and family has a safe and stable place to live. Any policy which harms, or puts in jeopardy, the safety and stability of our residents must be reconsidered.

Thank you for your consideration of our comments. On behalf of the Reaching Home Campaign, please feel free to contact us with any questions you might have.

Sincerely,



Kiley Gosselin
Executive Director
Partnership for Strong Communities



Stacey Violante Cote
Chair of RH Youth and Young Adult Homelessness Workgroup
Center for Children's Advocacy

³ HUD's Analysis of the rule: <https://nihc.org/sites/default/files/2019-05/Noncitizen-RIA-Final-April-15-2019.pdf>

⁴ CT PIT Count, 2019. https://cceh.org/wp-content/uploads/2019/06/PIT_2019.pdf

⁵ Center on Budget and Policy Priorities analysis of 2017 HUD administrative data https://docs.wixstatic.com/ugd/d97bc4_c0832bfe7d804ec499a2fdcc8fb9de3a.pdf