



Asian Americans for Equality

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Submitted via www.regulations.gov
Office of General Counsel, Rules Docket Clerk
Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-0500

Re: HUD Docket No. FR-6124-P-01, RIN 2501-AD89 Comments in Response to Proposed Rulemaking: Housing and Community Development Act of 1980: Verification of Eligible Status

To Whom It May Concern:

On behalf of Asian Americans for Equality (AAFE), one of New York City's leading community development organizations, we are writing to express our strong opposition to the Department of Housing and Urban Development's proposed rule referenced above. The proposal, impacting thousands of "mixed-status" families in public and federally-subsidized housing would undermine HUD's mission, destabilize communities across the United States and force thousands of children into homelessness.

Asian Americans for Equality is a 45-year-old nonprofit organization dedicated to empowering low-income immigrants in New York City to improve their lives. During the past four decades, AAFE has strengthened communities in Manhattan, Queens and Brooklyn by building and preserving affordable housing, supporting immigrant entrepreneurs and providing a wide range of community services.

Our organization offers robust multilingual counseling services to help low-income residents find affordable homes, and to preserve New York City's endangered affordable housing stock. In the past year, AAFE counselors assisted nearly 500 housing clients, including public housing residents and tenants in Section 8 buildings.

The Trump Administration has argued that the rule change -- barring undocumented immigrants from living in federally-subsidized housing -- would help wittle down long waiting lists for scarce affordable apartments. But in fact, this misguided scheme would worsen the affordable housing crisis, tear apart thousands of families and create economic hardship in cities across the country. Current law allows members of mixed-status families to live together in federally-subsidized housing as long as the subsidy is decreased to prohibit ineligible residents from receiving assistance. Under the proposed change, families would be forced to break up in order to receive federal support. In New York City alone, more than 11,000 residents would lose their prorated housing assistance, 43% of them children.

According to HUD's own analysis, fewer, not more residents, would receive housing assistance because of the proposed rule. In order to implement the rule, HUD would require tenants to verify their citizenship status through the Department of Homeland Security's Systematic Alien Verification for Entitlements Program. This added bureaucratic burden would endanger the housing security of millions of public housing residents, including many American citizens.

While AAFE serves New Yorkers from many different cultures and communities, the majority of our clients are immigrants from Asia. Approximately 60,000 residents of Asian descent live in public housing or in Section 8 buildings in New York City. The Asian American Pacific Islander (AAPI) community is the fastest growing ethnic group in New York. As a result, the AAPI poverty rate in New York City is the highest of any large city in the nation. This proposal would jeopardize the well-being of many members of our community, a vulnerable population already at risk due to the acute shortage of affordable housing options.

Every day, community members come into our neighborhood service offices with reports of harassment and intimidation from unscrupulous property owners attempting to illegally evict tenants. The proposed mixed-status family rule will only embolden bad landlords. For many months, we have been witnessing a disturbing trend, a chilling effect from the Trump Administration's many anti-immigrant policies and proposals. Many residents -- even some eligible for federal assistance -- are choosing to flee public housing out of fear that their families could be unjustly targeted for eviction.

We see this proposal for what it is: a blatant attempt to scapegoat and penalize hard-working immigrants who want nothing more than to contribute to American society and provide for their families. It is a dangerous scheme that, if implemented, would push thousands of seniors and children onto the streets, harming our economy, over-burdening big city social service agencies and undermining HUD's mandate to ensure access to fair and affordable housing.

Blaming struggling families will accomplish nothing. The real issue is the lack of adequate funding to support the preservation and development of affordable housing across our country. We implore the administration to focus its energies on strengthening and expanding public and private housing for low-income tenants, rather than pursuing mean-spirited and destructive policies to intimidate and marginalize immigrant communities.

We urge the Department of Housing and Urban Development to promptly withdraw this proposed rule in its entirety.

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