

July 8, 2019

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

Dear Sir/Madam:

I am writing on behalf of The Children's Partnership in response to the US Department of Housing and Urban Development's (the Department; HUD) Proposed Rulemaking to express our strong opposition to the changes regarding "verification of eligible status," published in the Federal Register on May 10, 2019 (RIN 2501-AD89; HUD Docket No. FR-6124-P-01). The proposed rule would displace more than 55,000 children who are U.S. citizens or legal residents and severely damage the well-being of children and families in communities across the nation. We urge the Department to withdraw the proposed rule in its entirety and ensure HUD's long-standing regulations remain in effect.

The Children's Partnership (TCP) is a California advocacy organization committed to improving the lives of underserved children where they live, learn, and play with breakthrough solutions at the intersection of research, policy, and community engagement. Since 1993, TCP has been a leading voice for children and a critical resource for communities across California and the nation, working every day to champion policies that provide all children with the resources and opportunities they need to thrive. Much of this work has focused on expanding access to health coverage for every child, regardless of background, and today, California has the lowest uninsured rate in the nation, with less than 3 percent of children without access to coverage.ⁱ Today's political climate of fear and uncertainty for millions of immigrant families is hindering health care access for children in immigrant families, damaging health and threatening the progress made to support overall children's well-being.

The Children's Partnership believes the proposed regulation would cause serious harm to not only immigrants themselves but also to the health and well-being of their children, of which many are U.S. citizens. We submit the following comments to urge the Department to withdraw this proposed rule.

- 1. A significant portion of California's (as well as America's) children live in immigrant families.** Citizen children with immigrant parents are a large and growing segment of the United States child population. Nearly 16 million citizen-children under age 18 in the United States—one out of every four children—have one or more parents who are foreign-born.ⁱⁱ An estimated 5 million children (of whom more than 80 percent are U.S. citizens) live in homes with at least one undocumented parent.ⁱⁱⁱ While the

majority of children in these households are citizens, the fact that they have at least one member of their household who has limited or no eligibility for public assistance based on their immigration status means that children in immigrant families have higher rates of poverty than children in U.S.-born families.

Our child population is growing increasingly diverse. As such, the rule change would particularly harm the future of states like California because it directly impacts a significant portion of California's children. California has 27 percent of immigrants in the United States, the largest share of immigrants compared to all other states,^{iv} and the most legal permanent residents in the country at approximately 3.3 million.^v In California, nearly half of children in the state – 4.5 million – have at least one parent who is foreign born.^{vi} In order to ensure the best for California and the nation, attending to the health and safety of children in immigrant families is critical, yet this rule change would accomplish the opposite.

The proposed rule threatens the health of children, and will effectively evict over 55,000 children who are eligible for the covered housing programs.^{vii} The changes proposed are specifically designed to force families to make choices that will harm their child's health. Mixed-status families will have to make the excruciating decision to either face eviction or separate as a family in order to retain housing stability. Both options will have lasting impacts on child and family health. Research shows that families who are evicted are more likely to experience homelessness, move into substandard or overcrowded housing, and have a sequence of adverse physical and mental health outcomes.^{viii} The alternative, family separation, is a stressful and traumatizing experience for children, which can alter the architecture of a child's developing brain and have lifelong consequences.

- 2. The Proposed Rule Will Inflict Trauma on Tens of Thousands of Immigrant Families Including Many Citizen Children.** The proposed rule places tens of thousands of immigrant families at risk of homelessness, jeopardizing their family and housing stability, both of which are critical to getting families on a pathway to self-sufficiency and better life outcomes. These outcomes will not only hurt families while they struggle to find housing in the short term, but will also lead to reduced opportunities and increased health problems for these families in the long term.^{ix} Studies have shown that unstable housing situations can cause individuals to experience increased hospital visits, loss of employment, and are associated with increased likelihood of mental health problems in children. Further, it can dramatically increase the risk of an acute episode of a behavioral health condition, including relapse of addiction in adults.^x Having safe and stable housing is crucial to a person's good health, sustaining employment, and overall self-sufficiency. These effects will be particularly prominent in the children, nearly all of whom are U.S. citizens, in these mixed- status families. Research has shown that economic and housing instability impedes children's cognitive development, leading to poorer life outcomes as adults.^{xi} Housing instability is directly correlated to decreases in student retention rates and contributes to homeless students' high suspension rates, school turnover, truancy, and expulsions, limiting students' opportunity to obtain the education they need to succeed later in life.^{xii}

Further, the proposed rule would force mixed- status families to make an impossible decision—either break up to allow eligible family members to continue receiving assistance or forgo the subsidies so that the families can stay together. Family separations undermine family stability, and lead to toxic stress, trauma, and attachment issues in children. Even a temporary separation has an enormous negative impact on the health and educational attainment of these children later in life, and many parents struggle to restore the parent-child bond once it has been disrupted by a separation.^{xiii}

However, since 70% of mixed- status families currently receiving HUD assistance are composed of eligible children and at least one ineligible parent, it is likely that these families will forgo the subsidies to avoid separation. In fact, the Department noted in its own regulatory impact analysis that “HUD expects that fear of the family being separated would lead to prompt evacuation by most mixed households, whether that fear is justified.”^{xiv} Therefore, this rule would effectively evict as many as 108,000 individuals in mixed- status families (in which nearly 3 out of 4 are eligible for assistance) from public housing, Section 8, and other programs covered by the proposed rule.^{xv} These mass evictions and departures from housing assistance will cause increased rates of homelessness and unstable housing among an already vulnerable population.^{xvi}

America’s future depends on ensuring that all children succeed. We need to invest in children, rather than put their healthy development and education at risk by destabilizing their families. Forcing parents to choose between their ability to remain with or reunite their family and their children’s access to critical benefits is short-sighted and will harm all of us.

- 3. The proposed rule knowingly risks an increase in child homelessness by barring children who are U.S. citizens and lawful permanent residents from maintaining and seeking federally subsidized housing.** By eliminating the ability of mixed- status families to receive prorated assistance on a permanent basis, the proposed rule robs eligible children of housing subsidies because they have parents with ineligible noncitizen status. Section 214 of the Housing and Community Development Act of 1980 (Section 214) limits access to federally subsidized housing programs to U.S. citizens and a specific list of noncitizen categories. Nearly all of the children in mixed status families who are receiving HUD assistance covered by Section 214 are U.S. citizens and lawful permanent residents (LPR) who live with parents or other adults who do not have eligible immigration status. HUD’s statistics show that 70% of mixed-status families are composed of eligible children and ineligible parents. There are over 38,000 U.S. citizen and otherwise eligible children in these families, and over 55,000 eligible children in mixed- status families overall. Since these children lack the legal capacity to sign leases themselves, the adult heads of household, including those who do not receive assistance, must sign these contracts on behalf of their family.^{xvii} However, by prohibiting the ineligible adults from living in subsidized units, the proposed rule forecloses the possibility of these U.S. citizen and LPR children from receiving any housing assistance under the covered housing programs.

Access to housing assistance already remains limited for families—only one in four families who are eligible for rental assistance in the U.S. receive it. Nearly 40% of the

households currently receiving rental assistance include children.^{xviii} Research shows that rental assistance for households with children results in significant positive effects for future child outcomes and family economic security. Housing assistance lifts about a million children out of poverty each year and can improve a child's chances for long-term economic mobility.^{xix} One study found that children in households receiving Housing Choice vouchers have higher adult earnings and a lower chance of incarceration.^{xx}

Housing assistance also improves child health—children of families receiving housing assistance had a 35 percent higher chance of being labeled a “well child,” a 28 percent lower risk of being seriously underweight and a 19 percent lower risk of food insecurity.^{xxi} Access to affordable housing provides stability for families and frees up income for other necessities. Low-income households with children that pay more than half of their monthly income on rent spend considerably less on other basic necessities—they spend \$200 less per month on food, nearly \$100 less on transportation, and about \$80 less on healthcare.^{xxii}

As previously stated, HUD estimates that 55,000 children will be displaced and at-risk of homelessness as a result of implementation of this rule. Child and youth homelessness continues to skyrocket in the United States – the U.S. Department of Education identified 1.3 million homeless children in the 2016-2017, which is a 70 percent increase since the 2007-2008 school year.^{xxiii} The proposed rule will only serve to further increase child homelessness, with detrimental effects to child well-being and our economy. Homelessness, even for a brief time, is extremely detrimental to a child's healthy development. The younger and longer a child experiences homelessness, the greater the cumulative toll of negative health outcomes.^{xxiv} Homelessness is also associated with an 87 percent greater likelihood of a child or youth dropping out of school.^{xxv} Rather than perpetuate child homelessness and its negative consequences, we should invest in children and strengthen our communities through robust housing subsidies and supports for all low-income families.

- 4. Access to essential public health benefits, such as housing assistance, demonstrably improves lives and strengthens communities at large, and many families would be devastated by the proposed rule.** By denying Californians the ability to continue to access housing programs, the proposed regulation would upend almost two decades of established practice, supported by both Republican and Democratic state administrations, that recognize the vital importance of these programs to the health, well-being, and success of these Americans and their children's future, and their inextricable connection to the health, well-being, and success of our state and our nation.

Access to stable and affordable housing is a basic platform for family and community health, well-being, and dignity, and our communities thrive when everyone has access to a high quality home. Immigrants and their families are vital to parts of the country's social and economic fabric, and we should be building a housing system that creates the conditions for all of us to flourish. Instead, this proposed rule change would harm the health of immigrant families and of our communities as a whole, threatening people with evictions and homelessness and breaking families apart. Public housing provides one

crucial source of homes affordable to over two million low-income people in America,^{xxvi} and the evidence is clear that affordable housing supports health.^{xxvii}

Research demonstrates that safety net programs, such as housing assistance, have short and long-term health benefits and are crucial levers to reducing the intergenerational transmission of poverty.^{xxviii} For example, when families have access to housing assistance, they have more resources to cover the cost of nutritious foods, health care, and other necessities.^{xxix} Children whose families receive housing assistance are more likely to have a healthy weight and to rate higher on measures of well-being—especially when housing assistance is accompanied by food assistance.^{xxx} Where families live is also directly tied to where they work. If parents lose access to affordable housing, they may also be at risk of losing their jobs.

Thousands of immigrant families will be evicted from federally subsidized housing under this proposal that will have severe consequences for their health. People who are evicted from their homes, or even threatened with eviction, are more likely to experience health problems like depression, anxiety, and high blood pressure than people with stable housing.^{xxxi} They are also more likely to become homeless, contend with long-term housing instability, and visit an emergency room.^{xxxii} Eviction and other forms of housing instability, such as having to move frequently, are particularly harmful for children, which means that these rule changes would harm the health of many children living in mixed-status families. Unstable housing means that kids are more likely to have behavioral problems and to struggle in school^{xxxiii}—and in classrooms where the student population changes quickly and frequently, all students can fall behind.^{xxxiv} Education itself is linked to positive health outcomes and longer lives;^{xxxv} thus, creating housing instability in children’s lives can have immediate and negative health impacts, but can also lead to poorer health across the life course by disrupting their education.

A recent landmark study from the National Academy of Sciences finds that child poverty and homelessness costs our society over \$1 trillion each year.^{xxxvi} This same study finds that making housing vouchers available for 70 percent of the families who are currently eligible would reduce child poverty by 3 percentage points. This rule takes the opposite approach by taking away housing assistance from thousands of children and families, ignoring research from leading experts regarding what is best for the well-being of the nation’s children and families.

- 5. The “chilling effect” of the Trump Administration’s repeated attacks on immigrant families are already having a far larger detrimental impact than just those directly impacted.** The anti-immigrant efforts of the current federal Administration has already created a “chilling effect,” causing eligible individuals and their family members to forgo enrollment or disenroll from needed services.^{xxxvii} The proposed rule will expand this chilling effect, with many more eligible individuals depriving themselves of affordable housing in order to protect their ability to stay together as a family. It will also cause a chilling effect on services that are not related to the proposed rule. These chilling effects will undermine access to other public programs that are critical to helping children lead healthier lives and perform better in school.^{xxxviii} Because of the Administration’s

repeated efforts to limit immigrant access to benefits, there have been disturbing reports of immigrants choosing not to enroll themselves or their children in public benefits programs despite being eligible because they are afraid that enrollment will undermine their ability to remain in the United States.^{xxxix} In a survey conducted by The Children's Partnership, two-thirds of providers reported an increase in families concerns about enrolling in Medi-Cal, WIC, CalFresh or other public programs (n=101, 66.9 percent).^{xl}

The proposal could further prevent immigrants and their citizen family members from using the programs their tax dollars help support, preventing access to health care, nutritious food and secure housing. It would make homelessness worse by discouraging enrollment in programs that address housing security, with profound consequences on families' well-being and long-term success. The fear created by these rules would extend far beyond any individual who may be directly targeted harming entire families and communities as well as the infrastructure that serves all of us.

As we stated above, the proposed regulation would worsen the lives of countless families across the United States. Children in immigrant families do not live in isolation. They live and grow up in communities where their individual success is critical to the strength of the country's future workforce and collective economic security. Our lives are profoundly interconnected with the lives of the individuals most impacted by this regulation. Evicting families or forcing them to separate will not only harm children's health today, but well into the future. We need policies that expand, not reduce, access to stable homes for families with children in order to ensure all children have opportunities to be healthy and reach their highest potential.

For these reasons, the Department should withdraw its current proposal, and dedicate its efforts to advancing policies that strengthen—rather than undermine—the ability of immigrant parents to support themselves and their children. If we want our communities to thrive, everyone in those communities must be able to stay together and get the care, services and support they need to remain healthy and productive – including stable housing. It is in all of our best interest to protect the well-being of children in immigrant families in order to strengthen the nation's future for every person that calls this country home.

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact me to provide further information.

Sincerely,



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ⁱ In 2016, 97% of California children ages 0-17 were estimated to have some form of health insurance coverage, as cited in kidsdata.org. “Child and Youth Health Care in California.” Lucile Packard Foundation for Children’s Health, 2018. Accessed June 15, 2018. <https://www.kidsdata.org/export/pdf?cat=51>

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^v Ponce, Ninez, Laurel Lucia, and Tia Shimada. “How Proposed Changes to the ‘Public Charge’ Rule Will Affect Health, Hunger and the Economy in California.” Press Releases | UCLA Center for Health Policy Research. November 7, 2018. Accessed November 20, 2018. <http://healthpolicy.ucla.edu/newsroom/press-releases/pages/details.aspx?NewsID=263>.

^{vi} kidsdata.org. “Children Living with One or More Foreign-Born Parent.” Lucile Packard Foundation for Children’s Health, 2018. Accessed June 15, 2018. <https://www.kidsdata.org/topic/573/foreign-parents250/table#fmt=786&loc=2,127,331,171,345,357,324,369,362,360,337,364,356,217,328,354,320,339,334,365,343,367,344,366,368,265,349,361,4,273,59,370,326,341,338,350,342,359,363,340,335&tf=79>.

^{vii} See HUD, Regulatory Impact Analysis, Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980, Docket No. FR-6124-P-01, at 6-8 (Apr. 15, 2019) (73% of eligible family members are children and there are a total of 76,141 eligible individuals in the covered programs, for a total of 55,582 eligible children; 70% of households are composed of eligible children with ineligible parents, for a total of 38,907 eligible children in households with ineligible parents).

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^x See Will Fischer, Research Shows Housing Vouchers Reduce Hardship and Provide Platform for Long-Term Gains Among Children, Center on Budget and Policy Priorities (October 7, 2015), <https://www.cbpp.org/research/research-shows-housing-vouchers-reduce-hardship-and-provide-platform-for-longterm-gains>; see also Linda Giannarelli et al., Reducing Child Poverty in the US: Costs and Impacts of Policies Proposed by the Children’s Defense Fund (Jan. 2015), <http://www.childrensdefense.org/library/PovertyReport/assets/ReducingChildPovertyintheUSCostsandImpactsofpoliciesProposedbytheChildrensDefenseFund.pdf>.

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^{xii} See Mai Abdul Rahman, *The Demographic Profile of Black Homeless High School Students Residing in the District of Columbia Shelters and the Factors that Influence their Education 55* (Mar. 2014) (Ph.D. dissertation, Howard University), available at <http://gradworks.umi.com/3639463.pdf> (citations omitted).

^{xiii} Laura C. N. Wood, *Impact of Punitive Immigration Policies, Parent-Child Separation and Child Detention on the Mental Health and Development of Children*, 2 *BMJ Paediatrics Open* (2018), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6173255/>.

^{xiv} HUD, *Regulatory Impact Analysis, Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 7 (Apr. 15, 2019).

^{xv} *Id.* at 8.

^{xvi} Pratt Ctr. for Cmty. Dev., *Confronting the Housing Squeeze: Challenges Facing Immigrant Tenants, and What New York Can Do* (2018), <https://prattcenter.net/research/confronting-housing-squeeze-challenges-facing-immigrant-tenants-and-what-new-york-can-do>.

^{xvii} See HUD, *Regulatory Impact Analysis, Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 6-8 (Apr. 15, 2019) (73% of eligible family members are children and there are a total of 76,141 eligible individuals in the covered programs, for a total of 55,582 eligible children; 70% of households are composed of eligible children with ineligible parents, for a total of 38,907 eligible children in households with ineligible parents).

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^{xix} Liana Fox, “The Supplemental Poverty Measure: 2017,” September 2018, <https://www.census.gov/library/publications/2018/demo/p60-265.html>.

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