



## Department of Housing and Urban Development

24 CFR Part 5

[Docket No.FR-6124-P-01]

RIN 2501-AD89

### Housing and Community Development Act of 1980: Verification of Eligible Status

Agency: Office of the Secretary, HUD

#### Action: Public Comment on Proposed Rule

Unitarian Universalists for Social Justice (UUSJ) is a religious nonprofit educational and advocacy organization whose members comprise individuals and congregations. Founded in 2000, the mission and work of UUSJ is grounded in the principles of the Unitarian Universalist faith which recognize the inherent worth and dignity of every person, the responsibility of the larger community to seek justice, equity and compassion in human relations, and the interdependent web of all existence of which we are a part. UUSJ seeks to mobilize and amplify the voices of UUs throughout the nation on matters of federal public policy. Nearly all of our social justice activities are based on these foundational principles, and thus inform our actions regarding immigration. We believe that many of the current policies of the United States Government are antithetical to a just, moral and equitable system of immigration of persons seeking to enter and remain in the United States of America.

We offer the following comments on the proposed rule referenced above:

This rule change that HUD has proposed is one of those policies that we believe are harmful to immigrants, especially those undocumented immigrants with children and/or other family members who are citizens or otherwise authorized by law to live in public housing. HUD's own estimate is that, if made final, this rule change could result in the eviction of up to 55,000 citizen children currently living in HUD subsidized housing. **This is cruel, unnecessary and simply unacceptable.** The current interpretation of Section 214 of the Housing and Community Development Act of 1980 is a sensible one: that if an undocumented leaseholder in HUD housing has family members who are citizens or otherwise authorized then the family may continue to live in such housing, though the subsidy is prorated to reflect the ineligibility of assistance to undocumented individuals in the household.

This proposed change simply seeks to severely punish impoverished families of mixed immigration status. In addition, we believe this change would cause a sharp increase in homelessness, as many of those evicted would lack the financial resources to lease other kinds of housing. Such homelessness would inevitably result in some children entering state child welfare systems which are already overwhelmed with children who are neglected and/or abused. We believe this to be an unacceptable outcome, especially for a nation that prides itself on being family friendly.

For the above reasons, UUSJ asks that HUD withdraw this proposed rule in its entirety.