



August 26, 2019

Office of the General Counsel, Rules Docket Clerk
U.S. Department of Housing and Urban Development
451 7th St. 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 City of Santa Rosa and the City of Santa Rosa Housing Authority stand with the California Association of Housing Authorities (CAHA), the National Association of Housing and Redevelopment Officials (NAHRO) and other housing professionals in opposition to the changes proposed to Section 214 of the Housing and Community Development Act of 1980.

Federal regulations already prohibit rental assistance to ineligible noncitizens under the "mixed family status" rule. Housing Authorities screen and verify the citizenship status of all family members and pro-rate the funds based on the number of eligible family members, ensuring that the ineligible household member does not receive a housing subsidy.

The proposed rule change would prohibit any mixed families from participating in the program, requiring families to choose between separating and giving up their housing assistance. In Santa Rosa, reflective of the national statistics, most of the eligible United States citizens in these mixed family households are children. The destabilizing impact this rule change would have on these families and to the community was documented in the Department of Housing and Urban Development's (HUD) own Regulatory Impact Analysis, which indicated that most mixed households would leave the program rather than separate. In Santa Rosa, where there is already an affordable housing crisis, families leaving their stable and affordable housing would have few safe and decent alternatives. These consequences are counter to HUD's own mission and the mission of Housing Authorities across the country.



August 26, 2019

Comment Letter – Housing and Community Development Act of 1980

Page 2 of 2

In addition to the human impact, the proposed rule change would create an administrative burden on Housing Authorities that are already operating under reduced operating budgets. Enforcing compliance of this rule would require new procedural requirements, and it's likely that agencies will also face litigation as advocacy groups challenge the rule change. Housing Authority relationships with landlords will be damaged as agencies terminate subsidy for families who are in compliance with their rental agreements, leaving landlords with tenants who are unable to afford the full rent. These are avoidable consequences to an unnecessary change that will have, according to HUD's own analysis, no meaningful impact on waiting lists for housing subsidy programs.

The opposition to this proposed rule change has been overwhelming for good reason. The rule change is unnecessary since current regulations already effectively address the provision of housing assistance to ineligible noncitizens, and the negative impacts of implementing this change are clear.

Sincerely,

Stephen Burke

Chair

City of Santa Rosa Housing Authority