



June 13, 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

I am writing on behalf of the Kalamazoo Community Foundation regarding the Department of Housing and Urban Development proposed amendment to section 214 of HUD's Housing and Community Development Act of 1980. This proposed rule adds significant bureaucratic policies that unfairly target mix-status families who receive housing assistance. We strongly oppose this rule as HUD already regulates housing assistance by ensuring that only households with family members who are U.S. citizens, permanent residents, refugees and asylees, receive full assistance. Those who live in households with mixed-status family members receive support through prorated housing assistance to account for the number of eligible residents living in the house. We urge the rule to be withdrawn in its entirety and that HUD's long-standing regulations remain in effect.

Under this proposed rule, families receiving housing subsidies with one ineligible household member will become prohibited from receiving assistance and would no longer offer prorated assistance. At the Kalamazoo Community Foundation, we invest dollars into our community with a focus on issues that impact equity and education. Increasing access to housing for members of our community is critical to this work. We believe this rule will exasperate homelessness across our community for U.S. citizen children and their families. In Michigan, among all native-born children under age 6 over 50,000 have at least one immigrant parent. In fact, 70% of mixed status families currently receiving HUD assistance are composed of eligible U.S. citizen children and at least one ineligible parent, it is likely that these families will forgo the subsidies to avoid separation, exasperating the affordable housing crisis in our state and community. Furthermore, it is HUD's own internal analysis that this policy would create fear amongst mixed status households and would ultimately lead them to vacate their homes.

The Kalamazoo Community Foundation and leadership of the Kalamazoo Truth, Racial Healing and Transformation (TRHT) initiative strongly oppose the proposed

amendments. This proposal has significant potential to destabilize local communities like Kalamazoo where mixed-status families call home. We are among many nonprofit organizations that support policies that enable families to stay together to ensure child well-being. We recommend HUD maintains the current mandates of the Housing and Community Development Act of 1980 and urge the administration to create policies that address affordable housing and implement equitable methods that increase access to housing for low-income communities.

Sincerely,

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Carrie Pickett-Erway
President/CEO
Kalamazoo Community Foundation

A handwritten signature in blue ink, appearing to be 'MG-C' or similar initials.

Martha Gonzalez-Cortes
Vice President of Community Investment
Kalamazoo Community Foundation

