

June 19, 2019

The Honorable Benjamin S. Carson
Secretary
U.S. Department of Housing and Urban Development
451 7th Street S.W.
Washington, DC 20410

Dear Secretary Carson:

The City of Norwalk Housing Authority (NHA) urges you to withdraw the proposed rule published in the Federal Register (Docket No. FR-6124-P-01) regarding the Housing and Community Development Act of 1980: Verification of Eligible Status, and retain the current U.S. Department of Housing and Urban Development (HUD) regulations regarding household eligibility to receive housing assistance.

If implemented, the proposed rule would have a negative impact on vulnerable low-income families with children, including U.S. citizens and legal residents, by potentially ending housing assistance they currently receive. With the existing affordable housing shortage, these families could become homeless. Our City is investing scarce local funds to prevent and combat homelessness and the proposed rule could worsen the homeless situation in our community.

Currently, NHA has ten (10) mixed-status households on the program, which represents only 1.4% of our total program. Mixed-status households contain members with eligible and ineligible status. If all ten (10) mixed-status households were to be terminated, the impact on our waiting list would be negligible. In addition, mixed-status households have their rental assistance prorated to ensure that the ineligible household members are not subsidized; thus, the cost of housing mixed-status households is less. Replacing the mixed-status households with fully subsidized households will cost more. NHA's current funding does not support any increases in housing assistance payments. The proposed regulation does not provide additional funding to support the budgetary impact.

The proposed rule would force some families to make difficult decisions as whether to stay together or retain their housing assistance, worsening the economic prospects of these struggling families. The ten (10) mixed-status households that we serve have 21 children under the age of 18. Seventy percent (70%) of the mixed-status households have one or both parents with ineligible status. For families with no eligible parent, U.S. Citizen children, through no fault of their own, will have their housing assistance terminated and become severely disadvantaged.

I urge you to withdraw the proposed rule because of the harm it will cause to vulnerable families with children who are legally eligible for assistance and to the City's efforts to prevent and combat homelessness.

If you have any questions, please contact me at (562) 929-5944.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jesus M. Gomez". The signature is stylized and cursive.

Jesus M. Gomez
Executive Director