



July 9, 2019

Mr. Paul Compton
Office of General Counsel, Rules Docket Clerk
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, D.C. 20410-0500



RE: 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 Mr. Compton:

As one of the nation's largest federally qualified health centers, who is committed to ensuring that all individuals have access to vital healthcare and social services, AltaMed Health Services respectfully submits our comments in full opposition to the U.S. Department of Housing and Urban Development's proposed rule change, entitled Verification of Eligible Status, which would restrict the use of federally-assisted housing covered under Section 214 for ineligible immigrants.

For the past 50 years, AltaMed has been dedicated to serving medically underserved, uninsured, and under-insured families and individuals in Southern California by providing superior quality health and human services through an integrated world-class delivery system. Our services include a full continuum of care including pediatrics, complete primary care, obstetrics and gynecology, senior services with PACE programs, dental care, youth services, and HIV services. Today more than ever, we remain committed to fulfilling the healthcare and social needs of all Americans.

AltaMed is deeply concerned that this proposed rule change, if implemented as written, has the potential to force thousands of vulnerable low-income individuals and families into homelessness. As community healthcare providers, we believe there is a strong relationship between health, housing, and homelessness. Without stable housing, individuals and families will be at-risk of adverse health conditions. People experiencing homelessness may not be able to prioritize their health, make time for doctor's appointments, or adhere to medical advice and treatment. In many ways, housing itself can be considered a form of health care because it prevents new conditions from developing and existing conditions from worsening.

This proposed rule change threatens our ability to deliver on our mission to eliminate disparities in health care access and outcomes by providing superior quality health and human services through an integrated world-class service delivery system for Latino, multi-ethnic, and underserved communities in Southern California. As such, we oppose this proposed change as

its implementation may jeopardize the health, wellbeing, and housing security of the communities we serve. We urge the Administration to withdraw this proposal and instead work with local housing providers to develop policies and practices that are safe, supportive, and sustainable and support healthy communities and their residents.

Los Angeles County is home to about 3.5 million immigrants and also has some of the highest housing cost burdens in the state. This leaves many of our immigrant and non-immigrant residents reliant upon subsidized housing in order to remain sheltered. By restricting the use of federally-subsidized housing for ineligible immigrants, this proposed rule change has the potential to force thousands of individuals in Los Angeles County into homelessness, an already growing crisis.

Currently, HUD regulations do not allow for any portion of a housing subsidy to go to an ineligible immigrant. Mixed-status families (consisting of an ineligible immigrant and eligible immigrants and/or U.S. citizens) receive a prorated subsidy that is based on the number of eligible members of the household. By HUD's own analysis, the removal of prorated subsidies would cost HUD an estimated additional \$193 to \$227 million annually in order to serve the same number of individuals. This means that HUD would need Congress to either significantly increase funding to the public housing and Section 8 Housing Choice Voucher (HCV) programs or serve significantly fewer households.

This proposed change forces families to choose between separating or being evicted and becoming vulnerable to homelessness. It will bring financial hardship onto more families, and potentially weaken the familial and social networks that can help defend against homelessness. Additionally, children of ineligible immigrants (many of whom are U.S.-born) may end up in the care of other family members or friends and, quite possibly, even foster care. Thousands of children may also lose either family members or stable housing.

Immigrants Play an Integral Part in Our Communities

Immigrants are a vibrant and essential part of America; this proposed regulation ignores their value and instead portrays them as a negative part of our society. According to the University of California, Berkeley, immigrants play a vital role in America's economic and demographic growth.¹ These individuals are productive members of our society and are tax-payers, strengthening our country.

This proposed rule would have unintended consequences, likely resulting in an economic ripple effect which will impact jobs and ultimately result in reductions of tax revenue. Additionally, this proposed regulation jeopardizes the health and future in this country by creating unnecessary barriers for some of our nation's most underserved communities.

¹ Berkeley Review of Latin American Studies, Fall 2013. <https://clas.berkeley.edu/research/immigration-economic-benefits-immigration>

Immigrant communities are vital to Los Angeles and Orange County, and as one of our nation's leading health systems, we support policies that create access to resources that prevent homelessness, instead of using these resources in a punitive manner.

For the reasons stated above AltaMed implores you to withdraw this proposal and instead advance policies that strengthen—rather than undermine—the ability of our communities to thrive. Our country should focus on crafting policies that ensure opportunity and safety for all residents of our communities.

If you have any questions, please feel free to contact Dr. Marie S. Torres, Senior Vice President of Government Relations and Community Research Initiatives at 323-889-7328 or at mtorres@altamed.org.

Sincerely,

A handwritten signature in blue ink, reading "Cástulo de la Rocha". The signature is fluid and cursive, with the first name being the most prominent.

Cástulo de la Rocha, J.D.
President & CEO