

07/09/2019

Submitted via www.regulations.gov

- I 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

Dear Sir/Madam:

I am writing on behalf of Texas Homeless Network in response to the Department of Housing and Urban Development's (HUD) proposed rule to express our strong opposition to the changes regarding "verification of eligible status," published in the Federal Register on May 10, 2019 (RIN 2501-AD89; HUD Docket No. FR-6124-P-01). At Texas Homeless Network, we believe that the limits of human compassion for access to safe housing and shelter should not be dependent on status. Everyone deserves to be safe in the community and household they reside, even if it's not the community of their birth. Therefore, Texas Homeless Network does not support breaking apart families or restricting housing and shelter because of citizenship or a lack of evidence of that distinction. We urge the rule to be withdrawn in its entirety, and that HUD's long-standing regulations remain in effect.

Texas Homeless Network (THN) is a statewide non-profit membership-based organization helping communities strategically plan to prevent and end homelessness. THN works to end homelessness in Texas by collaborating with all communities, large and small, across the state to build systems to achieve this goal. We coordinate local and national advocacy efforts, data collection and research and serve as the host agency for the Texas Balance of State Continuum of Care (CoC) where we assist in the coordination of programs and funding. As the CEO & president of THN, I've worked with people experiencing homelessness and in homeless crisis response systems for over 22 years in communities throughout the state. I've seen the damaging effects that homelessness and housing stability has on every segment of our society, especially children. Homelessness, housing instability, and separations from household increase the risk of trauma, exposure to violence, and reoccurrence of homelessness later in life.

Through our work across Texas, THN has seen the severe and long-term consequences of housing instability that impacts every level of our state. On an individual level, these repercussions include, but are not limited to, mental and physical health of individuals and their families who are forced into homelessness due to lack of affordable, safe, or available housing. On a societal level, we witness damaged neighborhoods, economic downturn of a lost labor force, and strained community resources such as hospitals. By enacting this rule, HUD will create unnecessary and preventable trauma to families, neighborhoods, and the economy for generations to come.

We strongly advise HUD to immediately withdraw its current proposal and dedicate its efforts to advancing policies that strengthen — rather than undermine — the ability of immigrants to support themselves and their families in the future. If we want our communities to thrive, everyone in those

communities must be able to stay together and get the care, services, and support they need to remain healthy and productive.

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact me to provide further information.

Eric Samuels

President & CEO

Texas Homeless Network

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