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July 9, 2019

Office of the General Counsel, Rules Docket Clerk
Department of Housing and Urban Development
451 Seventh Street SW, Room 10276
Washington, DC 20410-0001

Comments Regarding: HUD-2019-0044-0001

FR-6124-P-01 Housing and Community Development Act of 1980: Verification of Eligible Status, available at: <https://www.regulations.gov/document?D=HUD-2019-0044-0001>

Health & Medicine Policy Research Group (Health & Medicine) strongly opposes HUD's proposed rule (Regulations.gov Document ID HUD-2019-0044-0001) to prohibit mixed status families from living in subsidized housing. This proposed change unjustly punishes mixed status immigrant families who are only exercising their ability to access subsidized housing under current federal law. Housing is a human right and it is inhumane to split up families seeking to fulfill a basic human need for shelter. **We demand that the proposed rule be immediately withdrawn.** Family unity should be considered a fundamental value and component of our immigration system. The proposed rule will force many families to choose between being torn apart and homelessness.

These outcomes will not only hurt families while they struggle to find housing in the short term, but will also lead to reduced opportunities and increased health problems for these families in the long term. Studies have shown that unstable housing situations can cause individuals to experience increased hospital visits, loss of employment, and are associated with increased likelihood of mental health problems in children, and can dramatically increase the risk of an acute episode of a behavioral health condition, including relapse of addiction in adults.

Health & Medicine promotes health equity, both as an outcome and as a process of assurance of the conditions for optimal health for all people. Again, housing is a basic human need and the links between housing and the health of individuals, families, and communities are clear. As an organization focused on promoting health equity for all people, Health & Medicine supports policies that reduce discrimination across all public policies, and we need improvement in assuring that all people have affordable, safe, healthy, and accessible housing. We expect the US Federal Government to support the wellbeing and general welfare of our people and this proposed rule change runs counter to this expectation. Having safe and stable housing is crucial to a person's good health, sustaining employment, and overall self-sufficiency.

The negative effects listed above will be particularly prominent in the children, nearly all of whom are U.S. citizens, in these mixed status families. Research has shown that economic and housing instability impedes children's cognitive development, leading to poorer life outcomes as adults. Housing instability is directly correlated to decreases in student retention rates and contributes to homeless students' high suspension rates, school turnover, truancy, and expulsions, limiting students' opportunity to obtain the education they need to succeed later in life.

This proposed rule change must be contextualized by the racist and xenophobic statements by President Trump, such as some of the first words of his candidacy: “When Mexico sends its people, they’re not sending their best. They’re not sending you. They’re not sending you. They’re sending people that have lots of problems, and they’re bringing those problems with us. They’re bringing drugs. They’re bringing crime. They’re rapists. And some, I assume, are good people.” President Trump has also reportedly said, “Why do we want all these people from 'shithole countries' coming here?”

These and other statements exemplify racist bigotry and this proposed rule change to separate families and deny people from mixed status families housing appears to be rooted in this hatred and otherization of our brothers, sisters, and family members who make up our communities, contribute in innumerable ways to our economy, society, and culture, and yes, pay taxes. The Trump Administration has also made it a policy to put immigrants into concentration camps and to separate families—including separating children from their families—on the US-Mexico border. This is absolutely inhumane and has no place in the US. This context is a further reason to withdraw this rule change as one that is incompatible with the stated commitment to justice of the United States.

So, the proposal to divide families further and deny housing to mixed status will cause severe health harms to millions of individual immigrants and immigrant families, and it is part of a broader pattern of indifference to the health and wellbeing of immigrants. Unacceptably, President Trump’s vitriol, racist bigotry, nationalism, and xenophobia are being translated into public policy and practice in this and other issues, such as his efforts to build a larger, more reinforced wall along the U.S.-Mexico border. Every person in this country is responsible for fighting against injustice such as this proposed rule change, and readers of this comment are called upon to join the fight against this dehumanization and oppression.

Health & Medicine opposes this rule change on the grounds that it will harm people’s health and contribute to longstanding health inequities—unfair and remediable differences in health status and outcomes measured across different population groups. Further, this change, if it were adopted, will effectively deny people of human rights to housing and health, which is an act of cruel injustice and violence. This inhumane proposal is on the wrong side of history.

Health & Medicine urges the Office of the General Counsel of the US Department of Housing and Urban Development and the Federal Government to withdraw this proposed rule change (Regulations.gov Document ID HUD-2019-0044-0001) and stop committing heinous, harmful, and unjust actions against their and our fellow human beings.

Sincerely,

Wesley Epplin, MPH
Director of Health Equity
Health & Medicine Policy Research Group