

April 15, 2026

Regulations Division
Office of Policy Development and Research
Department of Housing and Urban Development
451 7th Street, SW
Room 10276
Washington, DC 20410-0500

RE: Public Comment on *FR-6524-P-01 Housing and Community Development Act of 1980: Verification of Eligible Status* proposed rule

I write to you on behalf of the National Alliance to End Homelessness (herein referred to as the Alliance) in response to *FR-6524-P-01 Housing and Community Development Act of 1980: Verification of Eligible Status* proposed rule. The Alliance is a nonpartisan, nonprofit organization whose mission is to prevent and end homelessness in America.

According to data published by the U.S. Department of Housing and Urban Development, in 2024 more than 771,000 people experienced homelessness on a single day in January, and approximately 17,500 people became homeless for the first time each week as a result of a dire affordable housing crisis and an insufficient social safety. Homelessness response systems across the country do not have the resources needed to keep up with this demand while also working to quickly rehouse those who are already experiencing homelessness.

The Alliance strongly opposes this proposed rule, as it would only serve to separate families and increase the number of households that become homeless each year.

The Impact of an Impossible Choice

This proposed rule forces families to make an unbearable decision: to separate and keep some members housed, or to face eviction and homelessness all together. In total, **80,000 people could be evicted from their homes**. That includes 37,000 children, nearly all of whom are themselves U.S. citizens.

If HUD enacts this rule, communities will be faced with mass displacement from permanent housing, increasing costs for local communities while causing undue trauma for families. In a country where 77% of low-income renters don't receive the federal rental assistance for which they are eligible, **the solution lies in scaling resources and proven strategies like permanent housing, not in displacing families to make room for others.**

HUD's own Regulatory Impact Analysis notes the risk of spiking homelessness due to this reckless proposal. Yet this analysis also fails to account for the other following factors which risk additional experiences of homelessness:

- **Burdens for Private Landlords Risk Fewer Affordable and Available Units:** Both the new document requirements and the anticipated disruptions caused by tenant turnover risk the discontinuation of private landlord participation in HUD programs. The Alliance has heard from hundreds of providers that HUD's reckless management of the Continuum of Care program has already caused significant strain: providers' relationships with landlords are in jeopardy, as some landlords are already turning over units to the private market. Additional administrative burdens, chaos, and turnover for private landlords likely will lead to less participation in HUD programs, drying up more already scarce available and affordable rental units for people at risk of and exiting homelessness.
- **Inefficient Resource Allocation Leads to Fewer Households Served:** HUD's assessment of anticipated net change in homelessness neglects to acknowledge the fact that mixed status families, [by definition](#), use fewer public resources than households where each member has citizenship: only certain household members can access these benefits. Given that each supposed "replacement citizen household" taking over a subsidy vacated by a mixed-status household will likely qualify for a higher subsidy because the assistance will no longer be prorated that means that HUD will proportionately be able to serve fewer families and households in a post mixed-status rule world. There will be [no one-for-one voucher transition](#), which would increase housing instability and homelessness on balance.
- **SAVE Usage Presents Barriers for All:** This proposed rule will have far-reaching consequences for all low-income households, not just those with mixed status. HUD's proposed use of the SAVE verification system raises concern because of its unreliability and delays associated with its usage. In fact, SAVE has led to numerous errors already in the [context of voter registration](#). In a recent [letter to HUD](#), prominent industry groups shared similar concerns about frequently changing and inaccurate data, among other issues. These issues risk costly delays and errors, potentially ruling out citizens for eligible aid and posing additional challenges particularly for **populations exiting homelessness who face [well-founded barriers](#) to accessing required documents, as well as other vulnerable groups, such as [older adults](#)**. This means that false negatives (U.S. citizens who do not appear in SAVE) could risk displacement and homelessness if they cannot receive difficult-to-access documents within the required timeframe.
- **An Ongoing Chilling Effect Will Compound Harm:** Even proposing this rule could cause a concerning [chilling effect](#), where people in need of services may choose to forgo housing assistance, even if they are eligible, to avoid the risk to their families by entering personal data into SAVE. A chilling effect puts thousands more families at the brink of homelessness, and entire communities will be disrupted through the upending of stably-housed families.

Increased Short- and Long-Term Costs to Community

The Trump Administration has identified “efficiency” as a core priority across all federal departments. However, this new rule will add further barriers for communities attempting to solve homelessness and will raise costs in the short- and long-term.

In its economic impact analysis, HUD notes “the costs of homelessness to local governments can be substantial.” In fact, **it is far more cost-effective to keep people housed than to respond to homelessness** with a mix of transitional shelters and community support; emergency services and health care; and interaction with the criminal justice system.

Yet HUD’s analysis also fails to account for:

- **Costs of homelessness among children compound throughout life:** Family instability, housing precarity, and early experiences of homelessness stunt learning development, increase the likelihood of later child welfare involvement, and lead to higher risk for adult homelessness later in life. All of these factors drive up costly cross-system involvement in both the short- and long-term.
- **Communities continue to reel from federal funding cuts and cannot absorb more costs in responding to homelessness.** Communities have expressed to the Alliance that they expect to incur expect significant costs by recent HUD actions that threaten people’s housing instability. These communities lack the resources to adequately respond to the depth of need: other voucher programs are at capacity, local philanthropy is already taxed, and states have a limited ability to provide new or additional support as they backfill for other federal funding cuts (e.g., Medicaid and SNAP). Alliance research further finds that the overworked, underpaid, and understaffed homelessness response workforce already struggles to meet current demand for homelessness services, especially given that homelessness hit a record high in 2025.

As the nation continues to face a severe shortage of affordable housing and grapple with an insufficient safety net, HUD should be supporting policies that increase the affordability of and access to safe and stable housing. We hope the Administration will reconsider this harmful proposal that will only make the crisis worse.

If you have any questions about our comment, please contact Marcy Thompson, Vice President for Programs and Policy, mthompson@naeh.org, 202-942-8246.

Sincerely,



Ann M. Oliva
Chief Executive Officer
National Alliance to End Homelessness