



CITY OF SOMERVILLE, MASSACHUSETTS MAYOR JAKE WILSON

April 10, 2026

Submitted via www.regulations.gov

Department of Housing and Urban Development
451 7th St. SW, Room 10276
Washington, D.C. 20410

RE: Comments on Proposed Rulemaking: Housing and Community Development Mixed Immigrant Status and Verification of Eligibility – FR-6524-P-01, RIN 2501-AE16 (“proposed rule”) – City of Somerville

Critical importance of housing stability for families

The City of Somerville, Massachusetts (“Somerville” or “the City”), is a city of approximately 82,000 residents located in the Greater Boston area. For the reasons set forth below, **the City of Somerville is strongly opposed to the newly proposed rule changing the eligibility for, and verification of, mixed immigrant status households living in federal public housing, or with Section 8 vouchers**. One of Somerville’s top priorities is to protect the housing stability of Somerville residents, and in particular, its most vulnerable residents. It is undisputed that eviction and loss of housing have numerous negative physical and mental health outcomes for tenants with particularly negative impact on children, the elderly and people with disabilities including an overall lowering of life expectancies.¹ Housing loss also often leads to long-term impaired educational attainment for school age children,² loss of employment and lower wages for adults,³ loss of stable childcare, and the interruption of other formal and informal support systems.⁴ In addition, housing instability renders women and children more vulnerable to sexual abuse and exploitation.⁵

In 2018, Somerville opened an Office of Housing Stability (OHS) to provide support to families facing housing instability after a decade of upwardly spiraling rents had rendered so many

¹ Emily A. Benfer, Housing is Health: Prioritizing Health Justice and Equity in the U.S. Eviction System, Yale Journal of Health Policy, Law and Ethics, 49-133, 22:2 (2024).

² The Effect of Eviction on Children: Yale Tobin Center for Economic Policy, Robert Collinson, et.al., working paper #33659 April 2025.

³ Housing and Employment Insecurity among the Working Poor: Matthew Desmond and Carl Gershenson, Oxford University Press, Society for the Study of Social Problems Volume 63, Issue 1 Feb. 2016.

⁴ Kohen DE, Leventhal T, Dahinten VS, McIntosh CN. Neighborhood disadvantage: pathways of effects for young children. Child Dev. 2008;79(1):156–169.

⁵ Left Outside: The Vulnerability of Survivors Facing Housing Instability, polarisproject.org 2024.



residents at serious risk of displacement. OHS receives over 1,400 requests for service annually, mostly from households facing serious housing instability. For all the reasons set forth below, we believe that adoption of the proposed rule would cause the displacement and homelessness of some of our most vulnerable residents including U.S. citizen adults and children, thus undermining Somerville's efforts to combat the forces of displacement caused by gentrification. The proposed rule should neither be adopted nor implemented.

Under existing HUD rules, federal housing subsidies are ONLY available to those lawfully in the United States and with an immigration status that makes them "eligible"⁶ for participation in relevant federal housing programs. Under current rules, if there are household members who are not claiming eligible status, many of whom are in the U.S. legally but not considered eligible for purposes of federal housing programs, they do not receive a "subsidy" and the household must pay out of pocket the full rental cost for these household members in addition to paying approximately 30% of the household's income for rent. This means that no federal dollars are being spent on immigrants who are not considered eligible for federal housing programs.

Under the proposed rule, households with at least one member who does not have eligible status would be forced to leave their homes entirely unless the person without eligible status vacates the home. This policy would in many instances either force one or more parents to abandon their minor children (which is against the law), force married couples to live apart or, in other instances, require parents to give up custody of their "ineligible" children to have them live elsewhere, including potentially in foster care. Forcing family breakup where no dollars are being spent to house "ineligible" members is both inhumane and short-sighted.

Impacted Somerville families – Forcing the breakup of families or rendering them homeless

Based on data received from the Somerville Housing Authority, there are currently 34 mixed immigrant status households in its portfolio: 30 in federal public housing and four living in private housing with Somerville-issued Section 8 vouchers.

Currently the average apartment in Somerville rents for \$3,708/month.⁷ Given historically high rents and the low incomes that forced families to apply for federal housing programs in the first place, it is almost guaranteed that these 34 mixed-status Somerville families would be rendered homeless or forced to live in dangerous, overcrowded and ever-revolving temporary situations – unable to afford even the cheapest of apartments in the area if they are forced out of their SHA housing. Ultimately, instead of saving government funds to be used for housing or other purposes, our city, the state, and the federal government would end up with large expenses for

⁶42 U.S.C. §1436a(a).

⁷ Zillow Rentals updated on March 16, 2026



medical care, emergency shelter, and other emergency services required to respond effectively to street homelessness. Forcing families, and especially families with children, persons with disabilities, and senior citizens who live in public and subsidized housing onto the streets would be a disaster and contrary to all government efforts to lessen or eliminate homelessness in the United States. According to the Center for Public Interest Communications, nearly half of persons in the U.S. surveyed nationwide were moderately or extremely concerned about their own ability to afford housing.⁸ This is an astonishingly high level of housing insecurity. HUD should be taking all steps possible to increase housing affordability and stability – not taking steps that will almost certainly exacerbate housing instability nationwide.

U.S. citizens and permanent residents who are part of these mixed immigrant households rendered homeless through implementation of the proposed rule would have higher barriers to completing education, higher incidences of being victims of crime, and interruption in their ability to maintain successful employment – all of which would mean that their ability to become self-sufficient would be unnecessarily impaired.

If this rule is adopted many families would be rendered homeless or forced to separate children from parents, parents from children, siblings from siblings, and in some cases spouses from each other. Loss of stable housing for each of these thirty-four Somerville families would create a humanitarian disaster, and, if this is caused by changes in HUD rules, one caused entirely and intentionally by the federal government.

Fiscal impact on Somerville Housing Authority – loss of overall housing subsidies

If each family that currently has prorated rent either ejects the person(s) who is not immigration eligible for federal public housing or gives up their housing entirely, this will lead to increased costs for the SHA and for Housing Authorities nationwide. Families with pro-rated rent pay a higher portion of their rent than families that are 100% immigration eligible for Section 8 or federal public housing. At present SHA is already in shortfall in its Section 8 program. This proposed HUD rule would either exacerbate SHA's budgetary problems OR cause SHA to not re-issue these vouchers, leading to a decrease in the number of housing subsidies available for Somerville residents. In addition, loss of funds might cause the SHA have fewer funds to maintain and turn-over their federal public housing units. HUD, in its own estimate, calculates that the transition from households paying prorated rents to households receiving full rental subsidies will cost the government and housing authorities approximately \$300,000,000.⁹

⁸ <https://realgoodcenter.jou.ufl.edu/center-update/october-2025-nationwide-survey-sheds-light-on-americans-increasing-worry-about-housing-affordability/>

⁹ As reported in the Question and Answers written by "Keep Families Together," regarding the impacts of the proposed rule.



Why the existing stock of affordable housing is wholly insufficient to meet current needs

Most recent data from the Somerville Housing Authority produced as part of its 2025 Resident Advisory Board process shows the stark insufficiency of available affordable housing resources – BEFORE the loss of any additional Section 8 vouchers or loss of federal units. There are currently 2,570 households with a local Somerville preference that are on the Section 8 waitlist. 75% of these families have income below 30% of Area Median Income and so are at imminent risk of eviction. **Within the prior twelve months, NO standard mobile Section 8 vouchers were issued.** 21 special purpose vouchers were issued (15 Family Unification/Youth Vouchers, 1 NED voucher, and 5 VASH vouchers for veterans).

Similarly, on the public housing side, there are 148 Somerville families on the federal family housing waitlist and 1,794 Somerville families on the state public housing waitlist. A total of 18 of these households were offered housing within the previous twelve months. Based on this placement rate, it would take approximately **107 years for the Somerville families on SHA's waitlists to get housed.**

Any action taken by HUD which may lead to the loss of Section 8 vouchers available to Somerville residents and/or that might render Somerville families homeless is entirely antithetical to Somerville and the federal government's efforts to promote housing stability and prevent involuntary displacement.

Conclusion

Communities thrive when EVERYONE has a safe and affordable place to call home. We urge you in the strongest manner not to issue or seek to implement this counterproductive proposed rule.

Thank you,

Ellen Shachter
Director, Office of Housing Stability
City of Somerville, MA