



**HOUSING AUTHORITY  
OF THE CITY OF SANTA BARBARA**

808 Laguna Street, Santa Barbara CA 93101

Phone (805) 965 – 1071 • Fax (805) 564 – 7041 • TTY English (866) 660 – 4288 • TTY Spanish (866) 288 – 1311 • [info@hacsb.org](mailto:info@hacsb.org) • [www.hacsb.org](http://www.hacsb.org)

March 5, 2025

*Submitted via USPS and Regulations.gov*

Office of the General Counsel  
Rules Docket Clerk  
U.S. Department of Housing and Urban Development  
451 7th Street, SW, Room 10276  
Washington, DC 20410–0500

RE: DOCKET NO. FR–6524–P–01  
HOUSING AND COMMUNITY DEVELOPMENT ACT OF 1980: VERIFICATION  
OF ELIGIBLE STATUS

To Whom It May Concern:

The Housing Authority of the City of Santa Barbara respectfully submits these comments in strong opposition to HUD’s proposed rule titled Housing and Community Development Act of 1980: Verification of Eligible Status, published February 20, 2026.

Our agency administers federal housing programs serving approximately 3,000 households in Santa Barbara. The proposed rule would significantly destabilize households currently participating in HUD programs under long-standing regulations that have governed mixed-status families for decades.

Recent national analysis of HUD administrative data shows the following:

- Nearly **79,600 individuals** in more than **20,000 mixed-status households** would be directly impacted if prorated assistance is eliminated
- Approximately **52,600 are U.S. citizens**
- Nearly **37,000 are children**, almost all of whom are U.S. citizens

California would bear a disproportionate share of this impact. Approximately 7,190 mixed-status households in California receive HUD-assisted housing, representing roughly 36 percent of all such households nationwide. In a state already facing the highest levels of homelessness and among the least affordable housing markets in the nation, destabilizing thousands of households will not expand opportunity, it will intensify housing instability.

...continued on next page

## Current Law Already Ensures Compliance

Section 214 clearly prohibits federal housing assistance from being provided on behalf of ineligible noncitizens. HUD's existing regulations faithfully implement this mandate through prorated assistance. In mixed-status households:

- **Assistance is calculated only for eligible members.**
- **Ineligible individuals receive no federal subsidy.**

The proposed rule does not prevent improper payments. It removes housing stability from eligible family members, including U.S. citizen children, who are lawfully receiving assistance.

## Impact on Families Served in Santa Barbara

In the City of Santa Barbara, the proposed rule would affect approximately:

- **148 mixed-status households**
- **252 children**
- Of the 148 households, **56 have no eligible adults** and include a total of **136 children.**

In high-cost rental markets such as ours, the loss of housing assistance almost certainly results in displacement into homelessness. There are few, if any, affordable alternatives available to extremely low-income families without federal subsidy.

Evicting households does not create new housing. It does not increase appropriations. It does not meaningfully reduce waitlists. It increases instability in communities already struggling with housing scarcity.

## Disproportionate Impact on Children and Seniors

**Nearly half of individuals in mixed-status households nationwide are children.** Housing instability during childhood is strongly linked to negative long-term educational, health, and economic outcomes.

The proposed rule also removes long-standing documentation flexibilities for seniors, many of whom may face significant barriers in producing required documentation due to lost records, cost constraints, or physical limitations.

## Administrative Burdens Without Funding

The rule would impose new verification and compliance requirements on public housing agencies without additional administrative funding. Redirecting limited agency capacity toward expanded documentation procedures detracts from our primary mission: providing safe, stable, affordable housing to eligible households.

Public housing agencies are housing providers, not immigration enforcement agencies.

## If HUD Proceeds, Changes Must Be Prospective Only

We respectfully urge HUD to withdraw this proposed rule. However, if HUD elects to proceed, **any regulatory changes must apply prospectively only to future applicants and not to current participants who relied in good faith on long-standing regulations.**

Retroactively destabilizing existing households is neither required by statute nor consistent with principles of fairness and housing stability.

## Conclusion

The proposed rule does not create new housing, expand supply, or increase appropriations. **Instead, it risks destabilizing tens of thousands of eligible Americans, including thousands of California families, during an ongoing housing crisis; and will ultimately increase cost to the federal government.**

For these reasons, the Housing Authority of the City of Santa Barbara respectfully urges HUD to withdraw the proposed rule.

Sincerely,

HOUSING AUTHORITY OF THE  
CITY OF SANTA BARBARA



ROB L. FREDERICKS  
Executive Director/CEO