

ACCORDING TO HUD ANALYSIS, PROPOSED MIXED-STATUS RULE IS EXPENSIVE, HARMFUL TO FAMILIES

HUD Analysis Reveals Proposed Mixed-Status Rule Would Cost Millions to Implement, Reduce the Number of Families Served, and Possibly Keep Affordable Housing Units Vacant

When federal agencies propose significant regulatory changes, they must publish a Regulatory Impact Analysis (RIA) examining the potential costs, benefits, risks, and uncertainties of the proposed change. When HUD proposed the [mixed-status rule](#), which would require families with mixed immigration statuses (mixed status families) in certain HUD programs to choose between staying together and losing their housing assistance, the attached [Regulatory Impact Analysis](#) exposed how harmful the proposal would be for housing providers, families, and broader communities.

HUD's analysis reveals the stark realities of implementation of the proposed rule:

- **Because costs per household would increase, HUD will serve fewer families in the impacted programs.**
 - Without funding beyond the amount of assistance lost from mixed-status households, HUD's analysis states, "[t]he immediate effect would be a reduction in the number of households and eligible persons assisted."
- **HUD acknowledges that the proposed rule could force housing providers to reduce services and potentially result in providers leaving units vacant.**
 - HUD's analysis notes that PHAs may need to respond by "offering fewer" Housing Choice Vouchers to tenants "or delaying issuing vouchers." PHAs may also choose to lower payment standards or use reserves.
 - Regarding public housing, PHAs may "leave some units vacant" to defer costs, or more likely, reduce expenses such as maintenance or tenant services.

- **If the proposal were finalized, HUD would need over \$300 million in additional funds to serve the same number of families.**
 - Notably, HUD's most recent budget request for [FY27 sought billions of dollars in cuts](#) to HUD programs.
- **The proposed rule's new verification requirements would harm people who are eligible for HUD programs, including U.S. citizens.**
 - A "significant share" of the aggregate costs for current tenants who lack verification documents would fall on U.S. citizens and nationals.
 - The costs and associated efforts of gathering documentation "could potentially result in denial, termination, or delay of housing assistance because some tenants and applicants cannot produce the required documents."
- **HUD's proposal would impose costs on public housing agencies (PHAs) and HUD-assisted owners – spanning from administrative costs of verifying eligible immigration status to the eviction and turnover costs of processing terminations.**

Immigrants, like all of us, have inherent dignity and worth by virtue of their humanity alone. Attacks on immigrant families harm all of us, including those who rely on federally assisted housing programs.

NLIHC strongly opposes HUD's proposed mixed-status rule and any attempt to reduce immigrant families' access to decent, safe, and affordable housing. We stand with our cross-sector partners and urge HUD to withdraw the rule and keep families whole and housed.

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