



## NATIONAL LOW INCOME HOUSING COALITION

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Regulatory Coordination Division  
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Re: DHS Docket No. USCIS-2025-0304: Public Charge Ground of Inadmissibility; RIN 1615-AD06

The National Low Income Housing Coalition (NLIHC) submits the following comments in strong opposition to the Department of Homeland Security's (DHS) Proposed Rule entitled "Public Charge Ground of Inadmissibility," published in the Federal Register on November 19, 2025. As written, the Proposed Rule would replace clear guidelines on what programs can be considered in a public charge assessment with widespread confusion. Without certainty regarding whether housing assistance programs are considered in the public charge assessment, families will forgo critical and lifesaving housing assistance. In turn, this unnecessary uncertainty will increase homelessness, risk severe health consequences including death, and worsen the housing affordability crisis for local and state governments. DHS should withdraw the Proposed Rule in its entirety.

The National Low Income Housing Coalition (NLIHC) is an organization whose members include state and local affordable housing coalitions, residents of public and assisted housing, nonprofit housing providers, homeless service providers, fair housing organizations, researchers, faith-based organizations, public housing agencies, private developers and property owners, local and state government agencies, and concerned citizens. While our members include the spectrum of housing interests, we do not represent any segment of the housing industry. Rather, we work on behalf of and with low-income people who receive or need federal housing assistance, especially extremely low-income people and people who are homeless.

The Proposed Rule is a dramatic shift from decades of immigration policy, and if finalized will create conditions for capricious interpretation and enforcement that are fundamentally in conflict with the American values of fairness and transparency. For

The National Low Income Housing Coalition is dedicated to achieving racially and socially equitable public policy that ensures people with the lowest incomes have quality homes that are accessible and affordable in communities of their choice.

over 100 years, legal precedent and Congressional action have affirmed a longstanding definition of public charge.

DHS's 1999 Field Guidance<sup>1</sup> defines public charge as an immigrant who is likely to become "primarily dependent on the government subsistence," as demonstrated by either (i) the receipt of public cash assistance for income maintenance or (ii) institutionalization for long-term care at government expense." Case law<sup>2</sup> affirms that public charge should not be used to assess temporary setbacks, but the Proposed Rule rejects long-standing precedent by proposing to rescind a 2022 final rule, "Public Charge Ground of Inadmissibility," and by failing to provide replacement language leaves a regulatory void.

The 2022 final Public Charge rule<sup>3</sup> made clear that many public assistance programs, including housing, Medicaid, and food assistance, should *not* be counted towards a public charge determination, while "public cash assistance for income maintenance" or "long-term institutionalization at government expense" would be counted. The new rule would rescind this guidance, but does not detail which assistance programs should or should not be considered in public charge; rather, it describes the agency's intent to provide future "policy and interpretive tools" in making a public charge determination. This vague language signals DHS officials may be seeking broad discretion in what factors to include in a public charge assessment.

By failing to define what assistance programs might be considered in a public charge assessment, the Proposed Rule creates an atmosphere of fear and uncertainty that negatively impacts all immigrant families, as well as the broader communities in which immigrant families live. An immigration official might decide any conceivable program falls under "public benefit." Refusing to concretely define "public benefit" in the public charge assessment could therefore lead to absurd results, such as publicly available benefits—e.g., emergency assistance from fire departments, public playgrounds, or community centers – being included within a public charge determination. As low-income households are more likely to use free or publicly available resources, they are most at risk of being negatively affected by this Proposed Rule. Moreover, discouraging immigrants from using any and all public services, for example from calling the fire department out of fear that doing so would be used against them in a public charge determination, threatens public safety at large.

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<sup>1</sup> U.S. Department of Justice Immigration and Naturalization Service Field Guidance on Deportability and Inadmissibility on Public Charge Grounds. (1999). <https://www.govinfo.gov/content/pkg/FR-1999-05-26/pdf/99-13202.pdf>

<sup>2</sup> *New York v. United States Department of Homeland Sec.*, Case 19-3595, 89-90, August 4, 2020 (2d Cir. 2020). <https://ccrjustice.org/sites/default/files/attach/2020/08/465-1.pdf>

<sup>3</sup> Public Charge Ground of Inadmissibility, 87 Fed. Reg. 55,742 (Sept. 9, 2022). <https://www.federalregister.gov/documents/2022/09/09/2022-18867/public-charge-ground-of-inadmissibility>

Injecting such uncertainty will also exacerbate our nation’s housing affordability crisis. NLIHC’s research has shown that affordable rental homes are out of reach for millions of hourly-wage workers, and low-income immigrants face additional barriers to housing, including language barriers, housing discrimination based on real or perceived national origin, securing documents needed to prove eligibility or citizenship, and lack of credit history or work authorization, which make it more difficult to secure rental housing.

The Proposed Rule puts immigrants in an impossible bind: having to choose between accessing the supports they need to live with dignity and protecting their immigration status. Among those most harmed by the Proposed Rule are children, including U.S. citizen children, who would likely stop participating in support programs to protect their loved ones’ immigration status, despite remaining eligible.<sup>4</sup>

## **I. The Proposed Rule will sow chaos and confusion.**

The Proposed Rule fails to provide clear guidance on what programs will be considered in a public charge determination.

Without clear, unequivocal guidelines about which federal programs will be considered in a public charge determination, millions of families will be left in the dark about which public programs and services they can access without jeopardizing a public charge designation. Immigrant eligibility in federally assisted housing programs is already complex and difficult for many families and housing providers to understand, and this proposed rule adds unnecessary confusion. In order to receive federally assisted housing benefits, immigrants and housing providers must understand a constellation of federal legal requirements, including Section 214 of the “Housing and Community Development Act of 1980” (Section 214<sup>5</sup>) and title IV of the “Personal Responsibility and Work Opportunity Reconciliation Act of 1996” (PRWORA<sup>6</sup>).

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<sup>4</sup> Artiga, S., Pillai, D., Cervantes, S., Pillai, A., & Rae, M. (2025). Potential “chilling effects” of public charge and other immigration policies on Medicaid and chip enrollment. KFF. <https://www.kff.org/medicaid/potential-chilling-effects-of-public-charge-and-other-immigration-policies-on-medicaid-and-chip-enrollment/>

<sup>5</sup> Section 214 limits people with certain immigration statuses that are eligible for certain housing programs from the U.S. Department of Housing and Urban Development (HUD) and the U.S. Department of Agriculture (USDA). Section 214 provides restrictions for certain immigrants, including: U.S. Nationals, Lawful Permanent Residents (Green Card holders), Violence Against Women Act (VAWA) self-petitioners, Asylees, Refugees, Parolees, Persons Granted Withholding of Removal/Deportation, Certain Victims of Trafficking, Individuals who entered under the Compacts of Free Association with the Marshall Islands, Micronesia, and Palau (COFA), and Immigrants admitted for lawful temporary residence prior to January 1, 1982. These populations are restricted, under Section 214 to HUD programs (Public Housing, Section 8 Housing Choice Vouchers, Section 8 Project-Based Rental Assistance (PBRA), Section 235 Home Loan Program, Section 236 Rental Assistance Program, and the Rent Supplement Program) and U.S. Department of Agriculture’s housing programs (Section 542 Rural Development Voucher program, Section 502 Guaranteed Rural Housing Loans, the Section 504 Home Repair program, and Section 521 Rental Assistance for the Section 515 and Section 514/516 programs).

<sup>6</sup> PRWORA restricts individuals who are not “qualified” from being eligible for “federal public benefits.” Which specific programs/assistance fall under the definition of “federal public benefit” is left up to each federal agency to interpret, and “qualified” individuals are immigrants with certain immigration statuses, including: Legal Permanent Residency, Refugees, Asylees, individuals paroled into the U.S. for a period of at least one year, individuals whose

Furthering the potential for confusion, HUD guidance on verifying immigration eligibility under PRWORA is forthcoming.<sup>7</sup> The Proposed Rule, if finalized, would add to the significant confusion that can be expected around verifying immigration eligibility under future PRWORA guidelines. In short, the Proposed Rule multiplies the chaos, confusion, and fear for immigrant families, communities, and service providers.

#### *Impact on mixed-status households*

The Proposed Rule opens the door to DHS considering benefits used not only by an individual being assessed as a potential public charge, but benefits used by their family members as well. This is a dramatic change from the 2022 Public Charge rule's clear standard that only benefits used by an individual will be considered in that individual's public charge determination. This change would directly impact "mixed-status" households, in which at least one U.S. citizen or eligible immigrant is living with family members who do not have eligible immigration status.<sup>8</sup> Mixed-status families, which include families with U.S. citizen minor children, are able to live together in HUD-subsidized housing on a prorated basis,<sup>9</sup> with only the eligible members receiving housing assistance. Family members who do not have HUD-eligible immigration status do not receive assistance, but they can continue to live with family members who do receive HUD housing assistance.

The Proposed Rule removes the definition of "receipt (of public benefits)" that states applying for or receiving benefits on behalf of family members is *not* considered receipt of benefits. Without this clear language, it is impossible for immigrants to know whether family members' benefits will harm their ability to obtain permanent residency. Under the proposed change, mixed-status families living under one roof and receiving prorated housing assistance may choose to forgo housing assistance, despite qualifying for it, and risk living in uninhabitable settings or facing homelessness out of concern for a family member's immigration status.

## **II. The Proposed Rule will have a chilling effect on low-income immigrants' ability to access needed assistance and exacerbate the affordable housing crisis.**

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deportation is being withheld on the basis of prospective persecution, individuals granted conditional entry pursuant to the Immigration and Nationality Act (INA) section 203(a)(7) as in effect prior to April 1, 1980, and Cuban/Haitian entrants.

<sup>7</sup> Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); Interpretation of "Federal Public Benefit," 90 Fed. Reg. 54,363, 54,365 (Nov. 26, 2025) (noting that immigration verification guidance will be issued).

<sup>8</sup> Under Section 214 of the "Housing and Community Development Act of 1980," individuals' eligibility for federal assistance housing programs depends, in part, on their immigration status. In addition to U.S. citizens and nationals, eligible non-citizens include lawful permanent residents, "Violence Against Women Act" (VAWA) self-petitioners, asylees and refugees, parolees, persons granted withholding of removal, certain victims of trafficking, individuals residing in the U.S. under the Compact of Free Association (COFA), and immigrants admitted for lawful temporary residence prior to January 1, 1982. Some immigrants with legal status – including individuals with student visas and Temporary Protected Status (TPS) holders – are ineligible for most federal housing programs.

<sup>9</sup> 42 U.S.C. § 1436a(b)(2).

During the first Trump Administration, the lead-up to and the rollout of new rules impacting immigrants' eligibility for assistance created a pronounced and persistent "chilling effect," as immigrants and their family members disenrolled from or failed to enroll in critical health, nutrition, housing, and economic support programs out of fear of jeopardizing their immigration status. Urban Institute [found](#)<sup>10</sup> in a December 2022 report that one in six immigrant families with children reported avoiding certain benefits, including food assistance, healthcare, and housing assistance, because of green card concerns, twice the rate of families without children. This is not for a lack of need—four in ten adults in immigrant families reported at least one material hardship concern. Researchers estimated the 2019 changes to the public charge rule kept between three to four million children in immigrant families from accessing benefits to address their basic needs. This chilling effect was most pronounced for immigrants' access to healthcare: about six percent of adults in immigrant families with children avoided Medicaid and Children's Health Insurance Program (CHIP) for either themselves or their family members due to public charge fears.

Housing and healthcare access are interconnected, with decades of evidence demonstrating how healthcare costs impact housing stability, and the critical role housing access plays in healthcare and long-term wellbeing. Research<sup>11</sup> shows that people who have higher housing costs are more likely to postpone or forgo medical care, which in the long term can cause more chronic conditions to develop, including diabetes, heart disease, and hypertension. People experiencing homelessness have higher rates of physical and mental health conditions and are likely to die earlier than low-income people with stable housing.<sup>12</sup> Additionally, programs pairing affordable housing and supportive services may reduce costs by shortening stays in hospitals, residential substance abuse programs, nursing homes, and prisons.<sup>13</sup> States that have used Medicaid's housing-related services show significant savings one year after moving people into affordable housing with supportive services.<sup>14</sup>

The health impacts of stable housing are particularly acute for children. Young children in families without stable housing are 20% more likely to be hospitalized than those who do not

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<sup>10</sup> Gonzalez, D., Haley, J., & Kenney, G. (2022). One in Six Adults in Immigrant Families with Children Avoided Public Programs in 2022 Because of Green Card Concerns. *Urban Institute*.

<https://www.urban.org/research/publication/one-six-adults-immigrant-families-children-avoided-public-programs-2022>

<sup>11</sup> Center on Budget and Policy Priorities. 2022. Housing and Health: Intertwined Problems, Shared Solutions, *Center on Budget and Policy Priorities*. <https://www.cbpp.org/research/health/housing-and-health-problems-are-intertwined-so-are-their-solutions#Intertwined>

<sup>12</sup> Garcia, C., Doran, K., & Kushel, M. (2024). Homelessness And Health: Factors, Evidence, Innovations That Work, And Policy Recommendations. *Health Affairs*, (43)2.

<https://doi.org/10.1377/hlthaff.2023.01049>

<sup>13</sup> Batko, S., Gillespie, S., & Fallon, K. (2024). Housing First Is Still the Best Approach to Ending Homelessness. *Housing Matters*: An Urban Institute Initiative. <https://housingmatters.urban.org/feature/housing-first-still-best-approach-ending-homelessness>

<sup>14</sup> National Academy for State Health Policy. (2021). How States Use Federal Medicaid Authorities to Finance Housing-Related Services. NASHP. <https://nashp.org/how-states-use-federal-medicaidAuthorities-to-finance-housing-related-services/>

have anxiety about rent or frequent moves.<sup>15</sup> The benefits of stable housing are numerous — children living in stable housing have better physical and mental health outcomes, better educational achievement, are at lower risk of hospitalization, and are less likely to face economic hardships.<sup>16</sup>

In addition to concerns about being able to pay the rent, low-income households face the dilemma of “heating or eating” — 33 percent of households have reported missing out on meals in order to pay rent and utility bills.<sup>17</sup> In 2019, more than half of the 46.5 million clients served by Feeding America, a hunger relief organization, had to choose between paying for housing or food.<sup>18</sup> Housing subsidies, in combination with nutrition benefits, improve housing security and household stability. Low-income families receiving housing subsidies with nutrition subsidies were 72% more likely to avoid housing overcrowding and frequent moves than those receiving housing subsidies alone.<sup>19</sup>

If finalized, the new public charge rule would discourage even eligible immigrants from pursuing needed assistance, including services that might prevent further need for public and emergency services, threatening to plunge those already struggling even deeper into poverty and making their route to a better life nearly impossible. Even if there is zero direct housing impact in the final rule, changes to the public charge rule would still force immigrants and their families to forego other forms of critical assistance, making them unable to afford already high housing costs.

NLIHC’s annual research report, *Out of Reach*, examines the relationship between wages and the cost of housing by calculating the Housing Wage, an estimation of the hourly wage a full-time worker must earn to afford a modest rental home at HUD’s fair market rent (FMR) without spending more than 30% of their income on housing costs. The national Housing Wage in 2025 was \$33.63 per hour for a modest two-bedroom rental home and \$28.17 for a modest one-bedroom, compared to the average hourly wage earned by renters, \$23.60 per hour, and the federal minimum wage, which is just \$7.25 per hour.<sup>20</sup> Wages needed to rent a modest home far

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<sup>15</sup> Sandel, M., Cook, J., Poblacion, A., Sheward, R., Coleman, S., Viveiros, J., & Stuertevant. (2016). Housing as a Health Care Investment: Affordable Housing Supports Children’s Health. *Insights from Housing Policy Research*. <https://www.childrenshealthwatch.org/wp-content/uploads/Housing-as-a-Health-Care-Investment.pdf>

<sup>16</sup> Children’s Health Watch. (2021). RE: Written testimony in support of H.202/S.111. <https://childrenshealthwatch.org/childrens-healthwatch-submits-written-testimony-to-the-ma-joint-committee-on-children-families-and-persons-with-disabilities/>

<sup>17</sup> National Energy Assistance Directors Association. (2018). New Study Reveals 6 Million Low-Income Households Need More Help to Pay Utility Bills. <https://neada.org/program-policy-reports/liheapsurvey/>

<sup>18</sup> Burrowes, K. (2019). How Stable, Affordable Housing Can Help Tackle Food Insecurity. <https://housingmatters.urban.org/articles/how-stable-affordable-housing-can-help-tackle-food-insecurity>

<sup>19</sup> Food Research & Action Council. (2019). WIC is a Critical Economic, Nutrition, and Health Support for Children and Families. [https://frac.org/wp-content/uploads/frac\\_brief\\_wic\\_critical\\_economic\\_nutrition\\_health\\_support.pdf](https://frac.org/wp-content/uploads/frac_brief_wic_critical_economic_nutrition_health_support.pdf)

<sup>20</sup> Colón-Bermúdez, E., Emmanuel, D., Harati, R., & Renzi, K. (2025). *Out of Reach: The High Cost of Housing*. National Low Income Housing Coalition. <https://nlihc.org/oor>

exceed not only the federal minimum wage, but the median wages of workers in many of the most common occupations, such as home health aides, food service workers, and administrative assistants. Immigrant workers are more likely to be employed in these low-wage occupations,<sup>21</sup> and more than half of all U.S. wage earners make less than the hourly wage required to afford a modest one-bedroom rental home.

Medicaid, CHIP, SNAP, and housing assistance play a crucial role in supporting low-income families. Numerous studies point to the positive long-term effects of receiving health, nutrition and housing assistance. Using benefits can help individuals and their family members become healthier, stronger, and more employable in the future and are a powerful tool for self-sufficiency. These vital programs should not be considered as part of the public charge determination.

As families turn away from health care and food or housing assistance, they are forced to pay out of pocket, reducing their already limited household budgets. As use of rental assistance decreases, the likelihood that low-income families fall into homelessness increases, with all of the personal and societal costs that accompany experiencing homelessness. Blaming immigrant families for the increasing gap between wages and housing costs and stripping them of their ability to access safe and affordable homes will only increase our country's racial and economic disparities and put housing and well-being further out of reach for many families. The Proposed Rule, if implemented, would create significant longer-term costs to the federal government, as people in unstable homes have poorer health, lowered educational attainment, and lessened lifetime earnings.

### **III. The Proposed Rule will cause confusion and delays for housing providers, public housing agencies, and more.**

If finalized, the unclear and confusing language in the Proposed Rule will cause delays and confusion for providers of federal benefits, including over 3,000 public housing agencies (PHAs), non-profit housing providers, for-profit housing providers, and Tribal housing organizations around the country. These providers must interpret and abide by state, local, and federal rules and regulations to successfully implement programs; the absence of clear guidance from the federal government creates uncertainty that poses a barrier to successfully serving households in need, including eligible immigrant families. For example, the Proposed Rule uses several different terms for federal benefits, including "public benefit programs," "public resources," and "any type of public resources," all without defining what means-tested public benefits would be considered in public charge determinations. Rather than providing clear guidance on how housing benefits will be considered, the proposed changes sow uncertainty that will undoubtedly cause bureaucratic delays and additional red tape for housing providers already navigating an uncertain environment.

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<sup>21</sup> Bernstein, H., & Hernandez-Lepe, F. (2025). Immigrants in the Low-Wage Workforce. WorkRise. <https://www.workrisenetwork.org/working-knowledge/immigrants-low-wage-workforce>

Housing providers will also have to field more questions from tenants and applicants about the new policies, and update forms and notices to ensure they are providing tenants and applicants with accurate information about the potential consequences of receiving certain housing assistance. Housing providers are anticipating this rule will cause many eligible immigrant families to forgo housing assistance, leading to tenant turnover in assisted units, which comes with significant administrative costs to owners and property managers. The collateral consequences on PHAs and housing providers of such a significant policy change are not addressed in the Proposed Rule.

In fact, housing provider groups expressed concerns regarding the 2018 public charge proposed rulemaking. For example, one organizational commenter stated that the 2018 proposed rule would “largely be ineffective and is unnecessary as almost all noncitizens are statutorily ineligible for the housing assistance programs proposed to be included in the list of public benefits<sup>22</sup>.” Another organization was “extremely concerned” that the 2018 rule proposed including the receipt of Section 8 or Public Housing assistance in a public charge determination, stating the change would have “undermined the mission” of the Section 8 and Public Housing programs, and “fail[ed] to recognize that beyond ‘cost savings’ and ‘reduced revenues,’ the Proposed Rule has a very real human cost<sup>23</sup>.” The current Proposed Rule goes even further than the 2019 final rule, opening the door for a myriad of assistance programs, including housing, to be considered in public charge determinations.

#### **IV. Instead of the Proposed Rule, the Trump Administration should take steps to support proven solutions to the affordable housing crisis.**

Instead of jeopardizing housing opportunities for families amid an affordable housing crisis, the Administration should focus on addressing the lack of sufficient funding to ensure that every family, regardless of immigration status, has access to one of the most basic human rights—a safe place to call home.

Targeting immigrant families and making it more difficult for them to find and maintain housing will not solve the affordable housing crisis. Instead, the Trump Administration and Congress must work together to enact real solutions that will help ensure everyone has an affordable home, including:

- *Preserving and building deeply affordable homes.* Ending the affordable housing crisis requires a major investment in developing and preserving homes affordable to the lowest-income people. A key underlying cause of the affordable housing crisis is the severe lack of affordable rental homes for America’s lowest-income households. Because the private sector cannot on its own build or maintain homes at a price these families can afford, the federal government must play a leading role. The White House and Congress can also

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<sup>22</sup> Embry, S. (2018). *Re: DHS Docket No. USCIS-2010-0012 Inadmissibility on Public Charge Grounds.* <https://www.regulations.gov/comment/USCIS-2010-0012-36281>

<sup>23</sup> Acosta, I. (2018). *Re: DHS Docket No. USCIS-2010-0012, Inadmissibility on Public Charge Grounds.* <https://www.regulations.gov/comment/USCIS-2010-0012-47825>

work together to incentivize or require local governments to eliminate restrictive zoning policies and preserve our nation’s existing affordable housing infrastructure, including public housing.

- *Expanding the availability of rental assistance.* Despite the growing gap between wages and housing costs, only one in four families who qualify for housing assistance receive it because of chronic underfunding. Policymakers should call for a major expansion of Housing Choice Vouchers, which would also help families keep more of their income for other essentials like food, medicine, education, and transportation.
- *Preventing families from facing evictions and homelessness.* A permanent national emergency rental assistance program that provides temporary financial assistance to help cover rent for households experiencing unexpected economic shocks (e.g., loss of work hours, unreimbursed medical bills, a broken-down car) would help prevent evictions and, in worst cases, homelessness among families with low incomes.
- *Protecting renters from discrimination.* Policymakers should support a broad array of renter protections, including the enforcement of existing federal protections guaranteed under the Fair Housing Act.

Housing is the cornerstone of what every person needs to survive and thrive. It impacts every aspect of our lives—education, health, economic security, and more. Stable and affordable housing prevents long-term health problems and fosters healthy, productive lives for people in every stage of life. It promotes healthy physical and cognitive development for babies and young children, success in grade school and in higher education, increased economic opportunity for those in the workforce, and safety and stability so older adults can age with dignity.

Children who live in stable, affordable homes enjoy better health and educational outcomes, greater access to economic opportunities, enjoy better mental and physical well-being, and benefit from stronger communities. In fact, nearly 40 percent of households receiving rental assistance have at least one child. Housing assistance lifts about a million children out of poverty each year, and can improve a child’s chances for long-term economic mobility—one study finds that children in households receiving Housing Choice vouchers have higher adult earnings and a lower chance of incarceration. Housing assistance also improves child health; children of families receiving housing assistance had a 35 percent higher chance of being labeled a “well child,” a 28 percent lower risk of being seriously underweight and a 19 percent lower risk of food insecurity.

Additionally, studies have also shown that that unstable housing situations can lead to negative consequences for people, including increased hospital visits, loss of employment, and adverse mental health impacts. These effects will be particularly prominent in children, many of whom are U.S. citizens, who are part of immigrant families. Research has shown that economic and housing instability negatively impacts children’s cognitive development, leading to poorer life outcomes as adults. Housing instability is linked 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.

Rather than limiting access to housing and other needed assistance for immigrant families, the federal government should be focused on expanding access to tools that promote housing stability, like rental assistance, for all households, regardless of immigration status. According to a 2024 report<sup>24</sup> from the Bipartisan Policy Center, meeting the nation's housing needs would lead to significant growth in U.S. productivity and the economy. A robust body of research has shown that access to affordable housing has broad, positive impacts on families, seniors, people with disabilities, and the economy. Having safe and stable housing is crucial to a person's health, sustaining employment, and overall self-sufficiency.<sup>25</sup>

## **V. Conclusion**

We urge the Department to immediately withdraw its current proposal and turn its efforts to advancing policies that strengthen rather than harm the ability of families to support themselves. If we want our communities to thrive, everyone including immigrants and their families must have access to critical benefits that put them on a path to health and self-sufficiency, because thriving communities are rooted in thriving families.

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact David Gonzalez Rice, NLIHC's senior vice president of public policy, for further information.



David Gonzalez Rice, PhD  
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National Low Income Housing Coalition

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<sup>24</sup> Klurfield, K. (2024). Exploring the Affordable Housing Shortage's Impact on American Workers, Jobs, and the Economy. Bipartisan Policy Center. [https://bipartisanpolicy.org/wp-content/uploads/2024/03/Exploring-the-Aff-Housing-Shortage-Impact-on-American-Workers-Jobs-and-the-Economy\\_BPC-3.2024.pdf](https://bipartisanpolicy.org/wp-content/uploads/2024/03/Exploring-the-Aff-Housing-Shortage-Impact-on-American-Workers-Jobs-and-the-Economy_BPC-3.2024.pdf)

<sup>25</sup> Weiss, E. (2016). A Place to Call Home. <https://nlihc.org/sites/default/files/A-Place-To-Call-Home.pdf>