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Submitted via [www.regulations.gov](http://www.regulations.gov)  
Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7<sup>th</sup> Street SW, Room 10276  
Washington, DC 20410-0500

**Re: HUD Docket No. FR-6524-P-01, RIN 2501-AE16 Comments in Response to Proposed Rulemaking: Housing and Community Development Act of 1980: Verification of Eligible Status**

## **Introduction**

The 101 undersigned organizations, which share a commitment to protecting the well-being of all children in the United States, strongly oppose the proposed rule of the Department of Housing and Urban Development (“HUD”), “Housing and Community Development Act of 1980: Verification of Eligible Status,” 91 Fed. Reg. 8151 (February 20, 2026). The proposed rule threatens to terminate housing assistance for almost 80,000 low-income people, including 37,000 children, most of whom are U.S. citizens or otherwise “qualified” noncitizens, and to force the harmful separation or displacement of about 20,000 mixed-status families.<sup>1</sup> Mixed status families are those with members who have immigration statuses that differ from one another.

The proposed rule represents a significant and unjustified departure from HUD’s long-standing policy of preserving family unity through prorated assistance. The current policy is consistent with legislative intent and aligns with the statutory requirements of Section 214 of the Housing and Community Development Act of 1980, as amended, 42 U.S.C., § 1436(a) (“Section 214”), which limits federal housing assistance to U.S. citizens, nationals, and certain categories of qualified noncitizens.

The proposed rule’s Regulatory Impact Analysis (“RIA”) fails to consider or adequately address many foreseeable adverse impacts and costs of the proposed changes. These include the cascading and long-term effects of forced family separation, housing instability, and homelessness on families, communities, public health, and state economies. As discussed in this comment, these harms are especially acute for children, affecting their development, health, education, well-being, and long-term potential.

For these reasons, we urge HUD to withdraw the proposed rule and to continue its current, Congressionally sanctioned policies and practices.

## **Key Changes in the Proposed Rule**

The proposed rule would make sweeping changes to longstanding HUD policies that have allowed families, including those with children in mixed-status households, to remain safely and stably housed. Specifically, the proposed rule would impose the following new, significantly more time- and resource-intensive requirements on the approximately 3,300 public housing agencies

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<sup>1</sup> Until March 16, 2026, HUD’s regulatory definition of a “mixed [status] family” was “a family whose members include those with citizenship or eligible immigration status, and those without citizenship or eligible immigration status.” 24 C.F.R. § 5.504(b).

(PHAs) and 53 Performance-Based Contract Administrators (PBCAs) (together, “Responsible Entities”) that administer HUD’s various rental assistance programs. This would impact an estimated 10 million people in roughly 5 million households, as well as countless future applicants.<sup>2</sup> In practice, these changes will be particularly challenging for families with children, people of color, and the roughly 85 percent of currently assisted tenants who are elderly and/or disabled, increasing the risk of displacement, instability, and homelessness.<sup>3</sup>

First, under current policy, many families include both eligible members, often U.S. citizen children, and ineligible members, typically parents.<sup>4</sup> While ineligible members do not receive assistance, they are not required to disclose their immigration status, allowing families to remain together.<sup>5</sup> The proposed rule would eliminate the “do not contend” option, requiring all household members to disclose their immigration status, and all must have eligible immigration status in order for the household to receive assistance. As a result, many families with children would be forced to choose between separation and the loss of housing assistance.

Additionally, under current policy, families receive reduced assistance based only on eligible members, allowing U.S. citizen children and other eligible individuals to benefit from housing support while families cover the remaining rent.<sup>6</sup> The proposed rule would eliminate ongoing prorated assistance for mixed-status families, meaning that families who cannot meet the new verification requirements would lose access to assistance altogether. For families with children, this would significantly increase rent burdens and place stable housing out of reach, especially in high-cost cities and states where mixed-status families are concentrated.

Finally, the proposed rule would impose new verification requirements on all Responsible Entities to (re)verify the documentation of all households currently receiving HUD assistance and applicants for such assistance, including U.S. citizens, through the new SAVE system (Systematic Alien Verification for Entitlements). This process can be error-prone, inconclusive, and potentially time-intensive, often requiring additional verifications due to outdated records, name discrepancies, or failure to submit all necessary identifiers.<sup>7</sup> These changes would introduce new administrative barriers that make it more difficult for families to secure and maintain assistance.

Effectively, the first two provisions bar **all** members of mixed-status families from being eligible for HUD assistance if every member does not have eligible immigration status, even if some members are. As detailed below, these proposed changes would restrict access to housing assistance and destabilize families, with particularly harmful consequences for children who depend on stable housing for their health, development, and well-being.

## **Proposed Rule Would Harm Tens of Thousands of Children and Families**

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<sup>2</sup> Gartland, E. (2025, December 12). Administration Plan Targeting Immigrants Would Take Away Rental Assistance, Create New Barriers. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create>.

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

<sup>5</sup> 42 U.S.C. §1436a(b)(2); 24 CFR § 5.508(e).

<sup>6</sup> 42 U.S.C. § 1436a(b)(2); see also 24 C.F.R. § 5.520

<sup>7</sup> See, e.g., ACLU, *Bower v. Social Security Administration*, USCIS FOIA Response 10 of 14, <https://www.aclu.org/cases/bower-v-social-security-administration>.

The proposed rule would have immediate and far-reaching consequences for children and families by forcing mixed-status households to choose between family unity and housing stability. In doing so, the rule would deny housing assistance to eligible children based solely on the immigration statuses of their family members and place thousands of families at risk of displacement. The analysis in this section focuses on mixed-status families currently receiving assistance and does not capture the broader impacts of the proposed rule on future applicants or the chilling effects that may deter eligible families from seeking or maintaining assistance.

By eliminating the ability of mixed-status families to live together in HUD-assisted housing, the proposed rule would effectively strip eligible children of access to housing assistance for which they qualify. Nearly all children in mixed-status families receiving HUD assistance are U.S. citizens or lawful permanent residents who live with parents or caregivers who do not have eligible immigration status. Approximately 73 percent<sup>8</sup> of mixed-status families who receive assistance are composed of eligible children and ineligible parents, and nearly 37,000 eligible children<sup>9</sup> live in these households. Because children cannot enter into leases on their own, they rely on adult household members to secure and maintain housing. By prohibiting ineligible adults from residing in subsidized housing, the proposed rule in practice bars these eligible children from accessing assistance, undermining the purpose of the program.

The rule would force families into harmful choices. Some families may attempt to remain in their homes without assistance, despite being unable to afford rent, increasing the likelihood of eviction. Others may be compelled to leave assisted housing altogether, resulting in displacement and housing instability. In many cases, families would face pressure to separate in order to preserve assistance for certain members. However, separation is not a viable or humane option for most families. HUD's own analysis indicates that the vast majority of mixed-status households include eligible children and at least one ineligible parent, making separation both impractical and deeply harmful to children.<sup>10</sup> As a result, many families are likely to forgo assistance entirely rather than separate. HUD's analysis, along with prior estimates, suggest that this proposal would effectively evict tens of thousands of individuals, including a large share of eligible children.<sup>11</sup> In effect, the proposed rule would operate as a large-scale eviction policy for mixed-status families, even though the majority of affected individuals are eligible for assistance.

The proposed rule would destabilize families, increase the risk of eviction and displacement, and deny eligible children access to critical housing supports. As discussed in the sections that follow, these disruptions to housing stability have significant and lasting consequences for children's health, development, and long-term outcomes.

### **Proposed Rule Will Increase Housing Instability, Evictions, and Displacement for Children and Families**

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<sup>8</sup> Regulatory Impact Analysis: Housing and Community Development Act of 1980, at 46 (Sept. 30, 2025).

<sup>9</sup> Gartland, E. (2025, December 12). Administration Plan Targeting Immigrants Would Take Away Rental Assistance, Create New Barriers. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create>; see also Regulatory Impact Analysis: Housing and Community Development Act of 1980, at 46 (Sept. 30, 2025).

<sup>10</sup> Regulatory Impact Analysis: Housing and Community Development Act of 1980, at 13 (Sept. 30, 2025).

<sup>11</sup> Gartland, E. (2025, December 12). Administration Plan Targeting Immigrants Would Take Away Rental Assistance, Create New Barriers. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create>.

The proposed rule would significantly increase housing instability for children and families by disrupting access to housing assistance and placing families at heightened risk of financial instability, eviction, and displacement, at a time when housing costs are rising across the country, including in communities that have traditionally been more affordable.

#### *Increased Rent Burden and Financial Instability*

Stripping children and families in mixed-status households of prorated housing assistance would substantially increase the number of families who are rent burdened, defined as paying more than 30 percent of income on rent and utilities, the HUD threshold to identify housing cost burden. Families with limited incomes would be forced to absorb the full cost of rent on the private market due to loss of assistance, resulting in sudden and unaffordable increases in rent. Families who are already living paycheck to paycheck do not have the financial cushion to absorb such increases, especially in high-cost rental markets. As a result, many families will likely fall behind on rent and experience cascading forms of housing instability, including overcrowded housing due to ‘doubling up’, frequent moves, threatened or actual eviction, and, in severe cases, homelessness.

#### *Increased Risk of Eviction and Displacement*

As housing costs increase and families fall behind on rent, the risk of eviction, which is one of the most severe and destabilizing outcomes of housing instability, increases sharply. An eviction threat or filing, even if it doesn’t result in removal, can create a lasting legal record that makes it significantly harder for families to secure housing in the future, as many landlords screen for a history of eviction filings. Research shows that eviction often leads to further housing instability, marked by frequent moves, overcrowding, and homelessness.<sup>12</sup> The threat of eviction alone can be deeply harmful for children and families. It creates chronic stress, disrupts households, and forces families to make impossible tradeoffs to avoid losing their housing. In many cases, eviction results in homelessness.

#### *Instability Disrupts Children and Families*

These pressures also lead to frequent moves, temporary living arrangements, and disruptions to where families are able to live. The proposed rule would cause residential churn, as families will be unable to remain together in subsidized housing and may struggle to find safe, stable alternative housing. Many will be forced to move, sometimes frequently, doubling up with others, relocating to less stable or distant housing, or cycling through temporary arrangements. Multiple moves are highly destabilizing for children. They disrupt school continuity, weaken relationships with teachers and peers, and disconnect families from community support. Children who experience housing instability are more likely to have behavioral problems and to struggle in school.<sup>13</sup> Frequent moves can also affect parents’ ability to maintain steady employment, further compounding financial strain.

#### *Disruptions to Safety Net Access Strain Family Budgets*

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<sup>12</sup> Collinson, R., Dutz, D., Humphries, J. E., Mader, N. S., Tannenbaum, D., & van Dijk, W. (2025). *The effects of eviction on children* (No. w33659). National Bureau of Economic Research.

[https://www.nber.org/system/files/working\\_papers/w33659/w33659.pdf](https://www.nber.org/system/files/working_papers/w33659/w33659.pdf); Cutts, D. B., Ettinger de Cuba, S., Bovell-Ammon, A., Wellington, C., Coleman, S. M., Frank, D. A., Black, M. M., Ochoa, E., Chilton, M., Lê-Scherban, F., Heeren, T., Rateau, L. J., & Sandel, M. (2022). Eviction and Household Health and Hardships in Families With Very Young Children. *Pediatrics*. [https://childrenshealthwatch.org/wp-content/uploads/peds\\_2022056692.pdf](https://childrenshealthwatch.org/wp-content/uploads/peds_2022056692.pdf)

<sup>13</sup> Gaylord, A. L., Cowell, W. J., Hoepner, L. A., Perera, F. P., Rauh, V. A., & Herbstman, J. B. (2019, May 8). Housing Instability Is Linked to Adverse Childhood Behavior. *Housing Matters*.

<https://howhousingmatters.org/research-summary/housing-instability-linked-adverse-childhood-behavior>

Housing instability and frequent moves also disrupt access to critical safety net benefits. Families with young children who experience cost-driven moves are significantly more likely to lose access to nutrition assistance and health care compared to similar families who remain stably housed.<sup>14</sup> Maintaining these benefits often requires families to recertify eligibility through mailed forms and documentation and in-person or phone-based appointments. Moves can interrupt receipt of important communications, shift families across administrative catchment areas, sever relationships with case workers or service providers, and affect eligibility when families move across state or county lines. As a result, families may lose access to essential support and regaining benefits can be difficult and time consuming. This disruption in benefits will further strain family budgets and limit their ability to afford basic needs.

At the same time, the loss of housing assistance places additional strain on household budgets. As rent consumes a greater share of income, families will be forced to make difficult tradeoffs between basic needs, including food, transportation, and health care.<sup>15</sup> The combination of lost assistance and increased costs further strains family budgets and deepens housing instability. Together, these disruptions reduce access to critical supports and resources precisely when families need them most.

### **Housing Instability and Homelessness Harm Children’s Health, Development, and Well-Being**

As described above, the proposed rule would fundamentally destabilize the lives of children and families by increasing rent burdens, heightening the risk of eviction and homelessness, forcing moves into lower-quality or overcrowded housing, and disrupting access to other safety net supports. These pressures compound one another, placing sustained strain on families and undermining the stability children need to thrive. In turn, these disruptions have direct and lasting consequences for children’s health, development, and overall well-being. Stable, safe, and affordable housing is foundational to child and family well-being, and policies that erode that stability carry profound consequences.

#### *Parental Stress and Family Well-Being*

Parents will do anything to keep a roof over their children’s heads and will forgo food and medical care for themselves to make ends meet, eroding their own physical and mental health. The well-being of children, however, is inextricably linked to that of their parents and caretakers. Poor parental health and parents’ lack of medical care are associated with poorer child health outcomes.<sup>16</sup>

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<sup>14</sup> Leifheit, K. M., Schwartz, G. L., Pollack, C. E., Althoff, K. N., Félice Lê-Scherban, Black, M. M., & Jennings, J. M. (2024). Moving Because of Unaffordable Housing and Disrupted Social Safety Net Access Among Children. *PEDIATRICS*, 153(3). <https://doi.org/10.1542/peds.2023-061934>

<sup>15</sup> Frank, D. A., Casey, P. H., Black, M. M., Rose-Jacobs, R., Chilton, M., Cutts, D., March, E., Heeren, T., Coleman, S., Ettinger de Cuba, S., & Cook, J. T. (2010, April 12). Cumulative Hardship and Wellness of Low-Income, Young Children: Multisite Surveillance Study - Children’s HealthWatch. *Children’s HealthWatch*. <https://childrenshealthwatch.org/cumulative-hardship-and-wellness-of-low-income-young-children-multisite-surveillance-study/>

<sup>16</sup> Ann & Robert H. Lurie Children’s Hospital of Chicago. (2019). When Parents Lack Health Insurance, Kids’ Health Suffers. [Luriechildrens.org](https://www.luriechildrens.org/en/news-stories/when-parents-lack-health-insurance-kids-health-suffers/). <https://www.luriechildrens.org/en/news-stories/when-parents-lack-health-insurance-kids-health-suffers/>

Material hardship causes distress, anxiety, and depression for parents. Mothers who experience eviction from their housing are more likely to report depression and poor health outcomes.<sup>17</sup> Parents and caretakers who are stressed about how to cover next month's rent have less time and mental bandwidth for their children.<sup>18</sup> Parental stress trickles down to their children and have negative implications for children's physical and mental health. Children react to parental stress — parental depression is linked to poor child health.<sup>19</sup> Housing instability and homelessness also increase the risk of child welfare involvement, further disrupting family stability and child well-being.<sup>20</sup>

### *Early Childhood Development Impacts*

Frequent moves often result from housing instability and disrupt children's health, education, and social networks. Children thrive on predictability, such as consistent sleep patterns and stable peer and family relationships.<sup>21</sup> A safe and stable home is a key component of positive early development for infants and toddlers. A stable home creates the environment for more consistent parenting, the development of stronger parent-child bonds, and the ability to play and explore, supporting the development of strong foundational brain architecture.<sup>22</sup> Timing matters, as the rapidly developing brains of infants and toddlers are highly attuned to caregiver mental well-being and the stress parents experience when housing is precarious, as well as to other environmental conditions.<sup>23</sup> Housing instability has an additive effect on other adversities a baby may experience, with lifelong consequences. A child with few adversities may be at increased risk developmentally when frequent moves are factored in.<sup>24</sup> The developmental risk of young children in poverty is compounded when housing instability is added. Even graver still is that young children in poverty and also living in crowded housing are at much higher risk of premature mortality.<sup>25</sup>

In some cases, families may face pressure to separate in order to preserve housing assistance for eligible children. Such separation can itself harm children. For infants and young children in

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<sup>17</sup> Desmond, M., & Tolbert Kimbro, R. (2015, September 17). For Children & Mothers, Eviction Has Long-term Consequences. Housing Matters.

<https://housingmatters.urban.org/research-summary/children-mothers-eviction-has-long-term-consequences>

<sup>18</sup> Quint, J., Griffin, K. M., Kaufman, J., Landers, P., & Utterback, A. (2018, August 27). Experiences of Parents and Children Living in Poverty: A Review of the Qualitative Literature. Acf.gov.

<https://acf.gov/opre/report/experiences-parents-and-children-living-poverty-review-qualitative-literature>

<sup>19</sup> England, M. J., & Sim, L. J. (2019). Associations Between Depression in Parents and Parenting, Child Health, and Child Psychological Functioning. Nih.gov; National Academies Press (US).

<https://www.ncbi.nlm.nih.gov/books/NBK215128/>

<sup>20</sup> Casey Family Programs. (2019, July). What do we know about the impact of homelessness and housing instability on child welfare-involved families? Casey.

[https://www.casey.org/media/TS\\_Impact-homelessness-housing-instability\\_2021.pdf](https://www.casey.org/media/TS_Impact-homelessness-housing-instability_2021.pdf)

<sup>21</sup> Early Childhood Scientific Council on Equity and the Environment. (2026). From Resources to Routines: The Importance of Stability in the Developmental Environment Working Paper No. 4. Center on the Developing Child at Harvard University.

[https://developingchild.harvard.edu/resources/working-paper/importance-of-stability-in-developmental-environment/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=StabilityPaper](https://developingchild.harvard.edu/resources/working-paper/importance-of-stability-in-developmental-environment/?utm_source=newsletter&utm_medium=email&utm_campaign=StabilityPaper)

<sup>22</sup> Amy Clair. (2019). Housing: an Under-Explored Influence on Children's Well-Being and Becoming. Child Ind Res 12, 609–626 . <https://doi.org/10.1007/s12187-018-9550-7>

<sup>23</sup> Sandel, M., Sheward, R., & Sturtevant, L. (2015). Compounding Stress the Timing and Duration Effects of Homelessness on Children's Health.

[https://www.childrenshealthwatch.org/wp-content/uploads/Compounding-Stress\\_2015.pdf](https://www.childrenshealthwatch.org/wp-content/uploads/Compounding-Stress_2015.pdf)

<sup>24</sup> DeCandia, C. J., Volk, K. T., & Unick, G. J. (2022). Evolving Our Understanding: Housing Instability as an ACE for Young Children. Adversity and Resilience Science, 3(4). <https://doi.org/10.1007/s42844-022-00080-y> ;

<sup>25</sup> Yu, J., Patel, R. A., Haynie, D. L., Vidal-Ribas, P., Govender, T., Sundaram, R., & Gilman, S. E. (2022). Adverse childhood experiences and premature mortality through mid-adulthood: A five-decade prospective study. The Lancet Regional Health - Americas, 15. <https://doi.org/10.1016/j.lana.2022.100349>

particular, caregivers are a primary source of stability and a buffer against stress. The loss of a close caregiver who must leave the household is a significant stressor that can undermine development. Research shows that disruptions in caregiver relationships can lead to lasting impacts on children's mental health and developmental outcomes.<sup>26</sup>

### *Health Consequences*

Housing instability forces many families into precarious and substandard living conditions. When families are forced into substandard conditions, children face increased risks of illness and developmental challenges. Families may be forced to accept lower-quality housing or to double up in overcrowded conditions in order to stay together and afford monthly payments. These environments often expose children to significant health and safety risks, including mold, pests, and other environmental hazards. Housing instability leads to postponed medical care and increased emergency room visits.<sup>27</sup> Youth who experienced housing instability in infancy had higher rates of depression and anxiety<sup>28</sup> compared to stably housed peers. Also, families with young children who have experienced eviction are more likely than those without evictions to have poor child health, developmental risks, and hospitalizations, as well as worse outcomes for caregivers and greater material hardship.<sup>29</sup>

Prolonged housing instability also puts families at greater risk of homelessness, causing further upheaval and transition that can threaten their physical safety. Homelessness during pregnancy or in the first few years of a child's life can lead to developmental delays and physical and health issues<sup>30</sup> that can have lifelong negative consequences for a child's future success. A review of the literature on the health impacts of homelessness for children found that negative physical outcomes, such as chronic illness and higher blood lead levels,<sup>31</sup> are more common among children experiencing homelessness.

### *Educational Consequences*

Children experiencing homelessness or housing instability move schools more frequently<sup>32</sup> than their stably housed peers. School moves due to housing insecurity are often abrupt and cause

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<sup>26</sup> Bouza, J., Camacho-Thompson, D. E., Carlo, G., Franco, X., Garcia Coll, C., Halgunseth, L., Mark, A., Livas Stein, G., Suárez-Orozco, C., & White, R. M. B. (2018, June 20). The Science is Clear: Separating Families has Long-term Damaging Psychological and Health Consequences for Children, Families, and Communities. Society for Research in Child Development. <https://www.srcd.org/briefs-fact-sheets/the-science-is-clear>

<sup>27</sup> Ma, C. T., Gee, L., & Kushel, M. B. (2008). Associations Between Housing Instability and Food Insecurity With Health Care Access in Low-Income Children. *Ambulatory Pediatrics*, 8(1), 50–57. <https://doi.org/10.1016/j.ambp.2007.08.004>

<sup>28</sup> Pierce, K. A., Mendelsohn, A., Smith, B., Johnson, S. B., & Duh-Leong, C. (2024). Trajectories of Housing Insecurity From Infancy to Adolescence and Adolescent Health Outcomes. *PEDIATRICS*, 154(2). <https://doi.org/10.1542/peds.2023-064551>

<sup>29</sup> Cutts, D. B., Ettinger de Cuba, S., Bovell-Ammon, A., Wellington, C., Coleman, S. M., Frank, D. A., Black, M. M., Ochoa, E., Chilton, M., Lê-Scherban, F., Heeren, T., Rateau, L. J., & Sandel, M. (2022). Eviction and Household Health and Hardships in Families With Very Young Children. *Pediatrics*, 150(4). <https://doi.org/10.1542/peds.2022-056692>

<sup>30</sup> Thrive from the Start. (2025). A Policy Agenda for Solving Infant and Toddler Homelessness. [https://thrivefromthestart.org/wp-content/uploads/2025/08/TFTS\\_PolicyAgenda\\_LongFormat\\_082525.pdf](https://thrivefromthestart.org/wp-content/uploads/2025/08/TFTS_PolicyAgenda_LongFormat_082525.pdf)

<sup>31</sup> Gultekin, L. E., Brush, B. L., Ginier, E., Cordon, A., & Dowdell, E. B. (2019). Health Risks and Outcomes of Homelessness in School-Age Children and Youth: A Scoping Review of the Literature. *The Journal of School Nursing*, 36(1), 10–18. <https://doi.org/10.1177/1059840519875182>

<sup>32</sup> Galvez, M., & Luna, J. (2014). Homelessness and Housing Instability: Impacts on Education Outcomes. Urban Institute. <https://www.tacomahousing.org/wp-content/uploads/2021/06/Urban-Institute-THA-Homelessness-and-Education-2014-12-22.pdf>

disruptions in learning<sup>33</sup> that are harmful to academic achievement. Homeless, highly mobile students tend to perform worse<sup>34</sup> in academic achievement than their peers. Students experiencing homelessness are also much more likely to be chronically absent from school and less likely to graduate high school than their economically disadvantaged peers who are stably housed.<sup>35</sup>

Preschool-age children experiencing homelessness are more likely to exhibit aggressive, depressive, anxious, or withdrawn behavior than their peers.<sup>36</sup> One in three children experiencing homelessness has a significant mental disorder by the time they turn eight years old.<sup>37</sup> The earlier and longer a child experiences homelessness, the more detrimental the effects are to a child's future success.<sup>38</sup> Children who experience homelessness for longer than 6 months are at higher risk of developmental delays and hospitalization. This is true for infants as well as young children ages 1-4. Older youth experiencing homelessness, whether on their own<sup>39</sup> or with their families,<sup>40</sup> have higher rates of suicide or attempted suicide than non-homeless youth.

### **Housing Assistance Improves Children's Long-Term Outcomes and Economic Mobility**

The well-documented benefits of housing assistance underscore what is at risk under the proposed rule. By making housing more affordable, rental assistance reduces housing instability and homelessness with positive implications for children's long-term outcomes and the future success of our country.

#### *Economic and Educational Gains from Housing Assistance*

Children in low-income households who received rental subsidies for several years of childhood experienced long-term economic benefits, such as higher annual earnings.<sup>41</sup> Each year spent in

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<sup>33</sup> United States Government Accountability Office. (2010). K-12 EDUCATION Many Challenges Arise in Educating Students Who Change Schools Frequently. <https://www.gao.gov/assets/gao-11-40.pdf>

<sup>34</sup> National Research Council and Institute of Medicine. (2010). Student Mobility: Exploring the Impacts of Frequent Moves on Achievement: Summary of a Workshop. The National Academies Press. <https://www.nationalacademies.org/read/12853/chapter/3#26>

<sup>35</sup> School House Connection. (2025). The Education for Homeless Children and Youth (EHCY) program, established under the McKinney-Vento Homeless Assistance Act in 1987, provides basic access to education for nearly 1.4 million children and youth experiencing homelessness. <https://e1.nmcdn.io/assets/schoolhouse/wp-content/uploads/2025/06/Educating-Children-and-Youth-Experiencing-Homelessness-2025-Fact-Sheet.pdf>

<sup>36</sup> Rog, D. J., & Buckner, J. C. (2007, August 31). Toward Understanding Homelessness: The 2007 National Symposium on Homelessness Research. Homeless Families and Children. ASPE. <https://aspe.hhs.gov/reports/toward-understanding-homelessness-2007-national-symposium-homelessness-research-homeless-families-0>

<sup>37</sup> Bassuk, E. L., & Friedman, S. M. (2005). Facts on Trauma and Homeless Children From the National Child Traumatic Stress Network Homelessness and Extreme Poverty Working Group. [https://www.nctsn.org/sites/default/files/resources/facts\\_on\\_trauma\\_and\\_homeless\\_children.pdf](https://www.nctsn.org/sites/default/files/resources/facts_on_trauma_and_homeless_children.pdf)

<sup>38</sup> Sandel, M., Sheward, R., Ettinger de Cuba, S., Coleman, S., Heeren, T., Black, M. M., Casey, P. H., Chilton, M., Cook, J., Cutts, D. B., Rose-Jacobs, R., & Frank, D. A. (2018). Timing and Duration of Pre- and Postnatal Homelessness and the Health of Young Children. *Pediatrics*, 142(4), e20174254. <https://doi.org/10.1542/peds.2017-4254>

<sup>39</sup> Slesnick, N., Zhang, J., & Walsh, L. (2020). Youth Experiencing Homelessness with Suicidal Ideation: Understanding Risk Associated with Peer and Family Social Networks. *Community Mental Health Journal*, 57(1). <https://doi.org/10.1007/s10597-020-00622-7>

<sup>40</sup> Barnes, A. J., Gilbertson, J., & Chatterjee, D. (2018). Emotional Health Among Youth Experiencing Family Homelessness. *Pediatrics*, 141(4), e20171767. <https://doi.org/10.1542/peds.2017-1767>

<sup>41</sup> Andersson, F., Haltiwanger, J. C., Kutzbach, M. J., Palloni, G. E., Pollakowski, H. O., & Weinberg, D. H. (2016, November 15). Living in Subsidized Housing Is Positively Associated with Adult Well-Being. *Housing Matters*. <https://housingmatters.urban.org/research-summary/living-subsidized-housing-positively-associated-adult-well-being>

subsidized housing as a teenager was associated with an additional \$200-500 in annual earnings at age 26.<sup>42</sup> Each additional year spent living in public housing was also linked with a reduced likelihood of incarceration.

Children also experience gains in academic achievement after their households receive a housing voucher.<sup>43</sup> Rental assistance can help families afford housing in lower-poverty neighborhoods and access higher-performing schools. Children who move to lower-poverty neighborhoods before age 13 are more likely to attend college and earn more as adults.<sup>44</sup> Housing vouchers help reduce school mobility,<sup>45</sup> which has far-reaching consequences as schools with high student turnover tend to have lower rates of academic achievement.<sup>46</sup>

#### *Health and Stability Benefits from Housing Assistance*

Rental assistance improves children's physical and mental health. Children living in public housing have better mental health outcomes<sup>47</sup> compared to children on the waiting list for housing assistance and miss fewer school days due to illness.<sup>48</sup> Federal rental assistance is associated with reductions in emergency department visits for asthma among children.<sup>49</sup> Housing vouchers are also associated with reduced household crowding and fewer moves for low-income families, with positive implications for children's mental health.<sup>50</sup> Children experiencing homelessness who receive housing vouchers were less likely to enter foster care, experience sleep disruptions, or exhibit behavioral issues.<sup>51</sup>

#### *Avoidable Costs and Long-Term Economic Impacts*

It is cost-effective for communities to keep families housed. Families with children who are unstably housed or experience homelessness have at least \$8 billion in avoidable health care and education costs each year.<sup>52</sup> These are avoidable costs associated with maternal and child

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<sup>42</sup> Ibid.

<sup>43</sup> Schwartz, A. E., Horn, K. M., Ellen, I. G., & Cordes, S. A. (2019). Do Housing Vouchers Improve Academic Performance? Evidence from New York City. *Journal of Policy Analysis and Management*, 39(1), 131–158. <https://doi.org/10.1002/pam.22183>

<sup>44</sup> Chetty, R., Hendren, N., & Katz, L. F. (2016). The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment. *American Economic Review*, 106(4). <https://doi.org/10.1257/aer.20150572>

<sup>45</sup> Gubits, D., Shinn, M., Wood, M., Brown, S. R., Dastrup, S. R., & Bell, S. H. (2018). What Interventions Work Best for Families Who Experience Homelessness? Impact Estimates from the Family Options Study. *Journal of Policy Analysis and Management*: [the Journal of the Association for Public Policy Analysis and Management], 37(4), 735–766. <https://pubmed.ncbi.nlm.nih.gov/30272428/>

<sup>46</sup> Kerbow, D. (1996). Patterns of Urban Student Mobility and Local School Reform. *Journal of Education for Students Placed at Risk (JESPAR)*, 1(2), 147–169. [https://doi.org/10.1207/s15327671espr0102\\_5](https://doi.org/10.1207/s15327671espr0102_5)

<sup>47</sup> Fenelon, A., Slopen, N., Boudreaux, M., & Newman, S. J. (2018). The Impact of Housing Assistance on the Mental Health of Children in the United States. *Journal of Health and Social Behavior*, 59(3), 447–463. <https://doi.org/10.1177/0022146518792286>

<sup>48</sup> Fenelon, A., Boudreaux, M., Slopen, N., & Newman, S. J. (2021). The Benefits of Rental Assistance for Children's Health and School Attendance in the United States. *Demography*, 58(4), 1171–1195. <https://doi.org/10.1215/00703370-9305166>

<sup>49</sup> Boudreaux, M., Fenelon, A., Slopen, N., & Newman, S. J. (2020). Association of Childhood Asthma With Federal Rental Assistance. *JAMA Pediatrics*, 174(6), 592. <https://doi.org/10.1001/jamapediatrics.2019.6242>

<sup>50</sup> Wood, M., Turnham, J., & Mills, G. (2008). Housing affordability and family well-being: Results from the housing voucher evaluation. *Housing Policy Debate*, 19(2), 367–412. <https://doi.org/10.1080/10511482.2008.9521639>

<sup>51</sup> Gubits, D., Shinn, M., Wood, M., Bell, S., Dastrup, S., Solari, C. D., Brown, S. R., McInnis, D., McCall, T., & Kattel, U. (2016). Family Options Study: 3-Year Impacts of Housing and Services Interventions for Homeless Families. *SSRN Electronic Journal*. <https://doi.org/10.2139/ssrn.3055295>

<sup>52</sup> Pablacion, A., Bovell-Ammon, A., Sheward, R., Sandel, M., Ettinger de Cuba, S., Cutts, D., & Cook, J. (2017, July 13). Stable Homes Make Healthy Families - Children's HealthWatch. *Children's HealthWatch*. <https://childrenshealthwatch.org/stable-homes-make-healthy-families/>

health, including increased costs of hospitalizations, ambulatory visits, dental procedures, medications, and mental health services.

Housing instability also imposes substantial long-term costs on society. Research estimates that housing instability among families with children regardless of immigration status will cost the U.S. \$111 billion in avoidable health and education expenditures over ten years.<sup>53</sup> Over time, these costs compound, placing strain on health and education systems while undermining child and family stability.

Housing assistance plays a critical role in reducing these long-term costs by promoting economic stability for families. Rental assistance prevented over 600,000 children from experiencing poverty in 2024. Child poverty costs our country upwards of \$1 trillion<sup>54</sup> in lost economic productivity and output. Without stable housing in childhood, these risks can persist across generations. Many homeless adults first experienced homelessness as children,<sup>55</sup> underscoring the urgency of preventing housing instability in early life.

### **Proposed Rule Will Worsen Chilling Effects Among Immigrant Families with Children**

The proposed rule will likely exacerbate “chilling effects” among immigrant families with children, deterring them from accessing essential support for which they are eligible due to fear of immigration enforcement and other repercussions. Evidence from prior policy changes and environments, particularly during the first and second Trump Administrations, demonstrates that even the threat of immigration-related consequences associated with participation in public programs leads families to withdraw, with lasting consequences for child health and well-being. This fear and stress, and the difficult decisions they force, negatively affect children’s physical and mental health and cognitive development.

#### *Evidence of Chilling Effects from Prior Policy Changes*

Evidence from prior policy changes and proposals underscores the magnitude of these chilling effects. Following similar anti-immigrant policies in the first Trump Administration, including changes to the public charge rule, families reported making agonizing decisions to withdraw their families from vital assistance programs for which they were eligible out of fear for their immigration status and family safety. A substantial body of research documents these responses and effects. Participation in core safety net programs, including the Temporary Assistance for Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP),<sup>56</sup> and Medicaid, declined significantly among U.S. citizen children in mixed-status families, falling at roughly twice the rate observed among U.S. citizen children in citizen-only

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<sup>53</sup> Ibid.

<sup>54</sup> Peterson Foundation. (2025). What Are the Economic Costs of Child Poverty? Peterson Foundation.

<https://www.pgpf.org/article/what-are-the-economic-costs-of-child-poverty/>

<sup>55</sup>Pittman, B., Nelson-Dusek, S., Gerrard, M., & Shelton, E. (2020). Homelessness in Minnesota Detailed Findings from the 2018 Minnesota Homeless Study.

[https://www.wilder.org/wp-content/uploads/2025/08/2018\\_HomelessnessInMinnesota\\_3-20.pdf](https://www.wilder.org/wp-content/uploads/2025/08/2018_HomelessnessInMinnesota_3-20.pdf)

<sup>56</sup> Bovell-Ammon, A., Cuba, S. E. de, Coleman, S., Ahmad, N., Black, M. M., Frank, D. A., Ochoa, E., & Cutts, D. B. (2019). Trends in Food Insecurity and SNAP Participation among Immigrant Families U.S.-Born Young Children. *Children*, 6(4), 55. <https://doi.org/10.3390/children6040055>

households.<sup>57</sup> Medicaid enrollment alone decreased by more than a quarter million children<sup>58</sup> in mixed-status families, and U.S. citizen children with a noncitizen parent were twice as likely to be uninsured<sup>59</sup> as those with U.S. citizen parents.

### *Chilling Effects Reduce Access to Health and Nutrition Supports*

These chilling effects also extended to health care utilization, with direct consequences for child health.<sup>60</sup> Research shows that following proposed changes to immigration and safety net policies, young children of immigrant mothers were less likely than children with U.S.-born mothers to receive recommended preventive care, including well-child visits.<sup>61</sup> These visits are essential for vaccinations, developmental screening, and early detection of chronic conditions, which are critical building blocks for lifelong health. Reductions in preventive care jeopardize children's immediate health and contribute to long-term health consequences and higher downstream health care costs. Ultimately, this harms community health and increases societal costs.

Chilling effects were similarly pronounced in nutrition programs. SNAP participation among U.S. citizen children in mixed-status families dropped by nearly one-quarter, representing a decline five times greater than that observed among children in citizen-only households.<sup>62</sup> Other studies focusing on families with young children found even steeper reductions.<sup>63</sup> Participation also declined in the National School Lunch Program,<sup>64</sup> further limiting children's access to consistent, nutritious meals. These reductions in food assistance increase the risk of food insecurity at critical periods of child growth and development.

Notably, these chilling effects extended to maternal and infant health. Immigrant mothers, including those exempt from public charge determinations, delayed or avoided enrolling in prenatal Medicaid coverage<sup>65</sup> and the Special Supplemental Nutrition Program for Women,

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<sup>57</sup> Capps, R., Fix, M., & Batalova, J. (2020, December 21). Anticipated "Chilling Effects" of the Public-Charge Rule Are Real: Census Data Reflect Steep Decline in Benefits Use by Immigrant Families. Migrationpolicy.org.

<https://www.migrationpolicy.org/news/anticipated-chilling-effects-public-charge-rule-are-real>

<sup>58</sup> Barofsky, J., Vargas, A., Rodriguez, D., & Barrows, A. (2020). Spreading Fear: The Announcement Of The Public Charge Rule Reduced Enrollment In Child Safety-Net Programs. Health Affairs, 39(10), 1752–1761.

<https://doi.org/10.1377/hlthaff.2020.00763>

<sup>59</sup> KFF. (2025, January 15). Key Facts on Health Coverage of Immigrants | KFF. KFF.

<https://www.kff.org/racial-equity-and-health-policy/key-facts-on-health-coverage-of-immigrants/>

<sup>60</sup> Nwadiuko, J., German, J., Chapla, K., Wang, F., Venkataramani, M., Vaidya, D., & Polk, S. (2021). Changes in Health Care Use Among Undocumented Patients, 2014–2018. JAMA Network Open, 4(3), e210763.

<https://doi.org/10.1001/jamanetworkopen.2021.0763>

<sup>61</sup> Ettinger, S., Miller, D. P., Raifman, J., Cutts, D., Bovell-Ammon, A., Frank, D. A., & Jones, D. K. (2023). Reduced Health Care Utilization among Young Children of Immigrants after Trump's Election & Proposed Public Charge Rule. Health Affairs Scholar, 1(2). <https://doi.org/10.1093/haschl/qxad023>

<sup>62</sup> FRAC. (2021). New Data Reveal Stark Decreases in SNAP Participation Among U.S. Citizen Children Living With a Non-Citizen - Food Research & Action Center. Food Research & Action Center.

<https://frac.org/research/resource-library/snapdecreasecitizenchildrennoncitizenparents>

<sup>63</sup> Bovell-Ammon, A., Cuba, S. E. de, Coleman, S., Ahmad, N., Black, M. M., Frank, D. A., Ochoa, E., & Cutts, D. B. (2019b). Trends in Food Insecurity and SNAP Participation among Immigrant Families U.S.-Born Young Children. Children, 6(4), 55. <https://doi.org/10.3390/children6040055>

<https://doi.org/10.3390/children6040055>

<sup>64</sup> Miller, D., John, R., Yao, M., & Morris, M. (2022). The 2016 Presidential Election, the Public Charge Rule, and Food and Nutrition Assistance Among Immigrant Households. Am J Public Health, 112(12), 1738–1746.

<https://doi.org/10.2105/AJPH.2022.307011>

<sup>65</sup> Wang, S. S., Glied, S., Babcock, C., & Chaudry, A. (2022). Changes in the Public Charge Rule and Health of Mothers and Infants Enrolled in New York State's Medicaid Program, 2014–2019. American Journal of Public Health, 112(12), 1747–1756. <https://doi.org/10.2105/ajph.2022.307066>

Infants, and Children (WIC).<sup>66</sup> As a result, studies documented declines in infant birth weight among affected populations, a serious concern given the well-established relationship between low birth weight and immediate and long-term health complications, including increased health care utilization and costs over the life course.

### *Chilling Effects Persist Over Time and Are Far-Reaching*

Importantly, the persistence and harms of the chilling effect did not dissipate when policies were withdrawn or reversed following the first Trump Administration.<sup>67</sup> The proposed rule is likely to generate even more severe chilling effects in the current environment. The broader context of heightened and violent anti-immigrant rhetoric and enforcement amplifies fear and uncertainty among immigrant communities. When families are under threat of hostility or risk from federal agencies, they are more likely to disengage from both public programs and public systems more broadly – including education, work, and health care. These fear-based decisions disproportionately harm children, who are denied access to resources intended to support their health, development, and stability.

The evidence demonstrates that chilling effects are widespread, extend across programs, and have profound consequences for child health and development. The proposed rule, together with other policy changes and threats, will lead to decreased participation in public programs beyond housing, including nutrition assistance and health care, among immigrant families, including U.S. citizen children in those families. These consequences undermine child well-being and impose broader societal costs. When families withdraw from housing assistance, health care, or nutrition supports, children experience direct impacts of housing instability, delayed health care, and food insecurity. In turn, unmet needs and preventable conditions are more likely to worsen, shifting costs to more intensive and expensive downstream systems.

### **Verification Requirements Will Create Barriers and Burdens for All Residents**

The proposed rule's expanded verification requirements would impose significant and unnecessary burdens on all HUD-assisted households, including U.S. citizens, while creating new risks of error, delay, and loss of assistance. These barriers would not only affect mixed-status families but would extend to millions of residents who currently rely on housing assistance to remain in stable housing.<sup>68</sup>

The proposed rule would require housing providers to verify citizenship and immigration status through federal systems, including the Systematic Alien Verification for Entitlements (SAVE) program, and in many cases require additional documentation when verification is incomplete. However, SAVE's automated responses are often inconclusive and raise concerns about

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<sup>66</sup> Barofsky, J., Vargas, A., Rodriguez, D., Matos, E., & Barrows, A. (2021). Putting out the “unwelcome mat:” The Announced Public Charge Rule reduced safety net enrollment among exempt noncitizens. *Journal of Behavioral Public Administration*, 4(2). <https://doi.org/10.30636/jbpa.42.200>

<sup>67</sup> Bustamante, A. V., Félix-Beltrán, L., Nwadiuko, J., & Ortega, A. N. (2022). Avoiding Medicaid enrollment after the reversal of the changes in the public charge rule among Latino and Asian immigrants. *Health Services Research*, 57(2). <https://doi.org/10.1111/1475-6773.14020>; No Kid Hungry . (n.d.). Immigrant Families Continue to Avoid Critical Nutrition and Other Safety Net Programs. Retrieved April 3, 2026, from [https://www.nokidhungry.org/sites/default/files/2021-12/NKH\\_Public%20Charge\\_Micro-Report\\_English\\_0.pdf](https://www.nokidhungry.org/sites/default/files/2021-12/NKH_Public%20Charge_Micro-Report_English_0.pdf)

<sup>68</sup> Gartland, E., & Acosta, S. (2025, December 12). Administration Plan Targeting Immigrants Would Take Away Rental Assistance, Create New Barriers. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/housing/administration-plan-targeting-immigrants-would-take-away-rental-assistance-create>

accuracy, including for U.S. citizens.<sup>69</sup> As a result, many eligible individuals would be required to submit documentary proof of their status, such as birth certificates or passports, to maintain assistance under the proposed rule.

These requirements would create substantial barriers for families. Many low-income households do not have ready access to official documents or face costs, time constraints, and logistical challenges in obtaining them. Delays or difficulties in meeting these requirements could result in interruptions or terminations of assistance, even for eligible residents. For families with children, even short disruptions in housing assistance can lead to housing instability, school disruptions, and increased stress that harms children's health and development. Expanded verification also raises serious privacy concerns, which may further deter eligible families, including those with children, from seeking or maintaining assistance.

Taken together, the proposed verification requirements would introduce unnecessary red tape that places housing stability at risk for millions of residents, with particularly harmful consequences for families with children who depend on consistent access to safe and affordable housing.

## **Conclusion**

For the reasons described above, we urge HUD to withdraw the proposed rule in its entirety and maintain its longstanding policies governing mixed-status families and verification of status. By eliminating prorated assistance for mixed-status families and imposing new and burdensome verification requirements, the proposed rule would increase housing instability, create confusion and fear, and deter eligible households from accessing or maintaining assistance. These impacts would fall most heavily on children, including U.S. citizen children, who depend on stable housing to support their health, development, and long-term success.

Stable housing is a foundation for children's well-being. Policies that reduce access to housing assistance or make it harder for families to remain housed undermine that foundation and carry lasting consequences for children and for the nation as a whole. Rather than advancing policies that destabilize families, HUD should focus on strengthening access to safe, affordable housing and supporting the conditions that allow children and their families to thrive.

Our comments include numerous citations to research and relevant documents, including direct links for the benefit of the Department in reviewing our comments. We direct the Department to each of the studies or documents cited, and we request that the full text of each of the items cited, along with the full text of our comments, be considered part of the administrative record in this matter for purposes of the Administrative Procedure Act.

Signed,

### National Organizations

American Friends Service Committee (AFSC)  
Appleseed Foundation  
Asian & Pacific Islander American Health Forum

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<sup>69</sup> GAO, Immigration Status Verification for Benefits: Actions Needed to Improve Effectiveness and Oversight (March 23, 2017) <https://www.gao.gov/products/gao-17-204>; Jen Fifield & Zach Despart, "Not Ready for Prime Time.' A Federal Tool to Check Voter Citizenship Keeps Making Mistakes," ProPublica (Feb. 13, 2026), <https://www.propublica.org/article/save-voter-citizenship-tool-mistakes-confusion>

Asian Americans Advancing Justice | AAJC  
Caring Across Generations  
Center for Law and Social Policy  
Center for the Study of Social Policy  
Children's HealthWatch  
Children's Rights  
Coalition on Human Needs  
Division for Early Childhood of the Council for Exceptional Children  
Economic Policy Institute  
Empowering Pacific Islander Communities (EPIC)  
Family Centered Treatment Foundation  
Family Promise  
Food Research & Action Center  
Holy Spirit Missionary Sisters, USA-JPIC  
Immigrant Legal Resource Center (ILRC)  
Institute for Child Success  
Kids in Need of Defense (KIND)  
League of United Latin American Citizens (LULAC)  
MomsRising  
National Association for Family Child Care  
National Association of Counsel for Children  
National Association of Pediatric Nurse Practitioners  
National Association of Social Workers  
National Center for Youth Law  
National Center on Adoption and Permanency  
National Parents Union  
National Women's Law Center Action Fund  
Prevention Institute  
Progressive Vietnamese American Organization (PIVOT)  
Public Justice Center - NCCRC  
Young Center for Immigrant Children's Rights  
ZERO TO THREE

#### State and Local Organizations

A Greater Hope  
ACCESS REPRODUCTIVE JUSTICE  
Advocates for Basic Legal Equality, Inc. (ABLE)  
Arab American Heritage Council  
Asian Americans Advancing Justice Southern California (AJSOCAL)  
CA Alliance of Child and Family Services  
California WIC Association  
Capitol Heights Presbyterian Church  
Central Coast Early Childhood Advocacy Network (CCECAN)  
Centro Hispano de East Tennessee  
Centro Multicultural La Familia  
Child Care Law Center  
Children's Advocacy Alliance of Nevada  
Children's Defense Fund-Texas  
Children's League of Massachusetts  
Children's Practice Group of Greater Boston Legal Services, Inc.  
Coalition for Asian American Children and Families (CACF)

Community Action Marin  
Connecticut Voices for Children  
CT Alliance of Foster and Adoptive Families  
Detroit Disability Power  
El Pueblo Unido - Atlantic City  
Emanuel Lutheran Church  
Empire Justice Center  
End Child Poverty California  
Equality California  
First 5 Monterey County  
Food for People  
Foundation Communities  
Glide Foundation  
Hawaii Children's Action Network Speaks!  
HIAS Pennsylvania  
IAJE  
Illinois Collaboration on Youth  
Kimberly Crafton Consulting LLC  
Kinnect  
LA Best Babies Network  
Latino Action Network  
Legal Key Partnership for Health and Justice  
Lutheran Social Services of the National Capital Area (LSSNCA)  
Massachusetts Coalition for the Homeless  
Massachusetts Immigrant and Refugee Advocacy Coalition (MIRA)  
MI Poder  
Michigan Immigrant Rights Center  
Michigan League for Public Policy  
Michigan's Children  
Mid MN Legal Aid (MMLA)  
Minnesota Budget Project  
Montgomery Citizens United for Prosper  
New Jersey Association of Mental Health and Addiction Agencies, Inc. (NJAMHAA)  
New Mexico Immigrant Law Center  
Para Los Niños  
Pennsylvania Immigration Coalition  
Pennsylvania Partnerships for Children  
PHSS  
Prevent Child Abuse Oregon  
Rhode Island KIDS COUNT  
Serving at-risk families everywhere, Inc.  
Suitcases of Hope  
Tennessee Justice for Our Neighbors  
The California Family Resource Association  
the Child Abuse Prevention Center  
The Children's Partnership  
United Community Family Services  
Utahns Against Hunger  
Voices for Utah Children