

American Academy of Pediatrics

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July 5, 2019

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

Re: HUD Docket No. FR-6124-P-01, RIN 2501-AD89 Comments In Response to Proposed Rulemaking: Housing and Community Development Act of 1980: Verification of Eligible Status

Dear Sir/Madam,

This letter is written on behalf of the NYS American Academy of Pediatrics (NYS AAP) - Chapter 2 to express our strong opposition to the changes regarding "verification of eligible status," published in the Federal Register on May 10, 2019 (RIN 2501-AD89; HUD Docket No.FR-6124-P-01). As pediatricians, our 1500 members have tremendous concerns about the negative impacts this proposed rule would have on the health and well-being of children around the country and in New York State.

Our Chapter members provide the majority of care to children across the New York City boroughs of Brooklyn and Queens, as well as Nassau and Suffolk counties. Together we care and advocate for the health of millions of children in this region and the many thousands that would suffer if the proposed rule were implemented.

Access to housing is one of the most basic of human rights. Medically, children need a safe, affordable and stable home to stay healthy and thrive. By HUD's own analysis, there are 55,000 children who are US citizens or who are otherwise eligible to receive housing benefits that could face eviction under the proposed rule (1). New York State estimates 3,160 families would lose assistance because a member of their household is ineligible for benefits (2). Currently assistance is already pro-rated to not include ineligible family members. Seventy percent of the households that would be negatively impacted by this proposed rule are families with eligible children (3). By barring assistance to eligible US citizen children this rule effectively targets these most vulnerable members of the community.

Housing assistance lifts about one million children out of poverty each year and improves a child's chances for long term economic mobility. Housing assistance improves child health, giving them a 35% higher chance of being labeled a "well child," a 28% lower risk of being seriously underweight and a 19% lower risk of being food insecure (4).

Unstable housing situations for children increase societal costs and are associated with increased hospital visits and increased likelihood of mental health problems in children. Housing instability impedes a child's cognitive development and is directly correlated with decreased student retention rates in school, higher suspension rates and expulsions -- thereby limiting opportunities for education and impeding further economic mobility.

The proposed rule would increase child homelessness which is already increasing. As current research demonstrates, much of long-term health is a direct result of a child's social environment during childhood. Stable housing for children is an important, well-known, medically-accepted, social determinant of health. Even short-term homelessness has a documented, evidenced-based, negative influence on a child's development and leads to worsening health outcomes. As current developmental biology has illustrated, the impact of unfettered stress, experienced early in childhood (termed, "Toxic Stress") creates long-term sequelae in children, which may not be felt for years (5). Thus, the detrimental impact of poor housing or homelessness on the children we care for may not impact an individual child's health for years, manifesting as adult-onset obesity, hypertension, and even diabetes.

If implemented, this rule would force mixed-status households to face the choice of separating their families to ensure that some members receive assistance or foregoing the assistance to keep their families together. Undoubtedly the fear and confusion created by the rule would cause many families to not seek the housing subsidies they are entitled to. The NYS American Academy of Pediatrics - Chapter 2 strongly opposes the implementation of the rule and urge that it be withdrawn in its entirety.

Thank you for the opportunity to submit comments on the proposed rule.

Shetal Shah, MD, FAAP
President
NYS American Academy of Pediatrics - Chapter 2

Eve Krief, MD, FAAP
Chair, Legislative Committee
NYS American Academy of Pediatrics - Chapter 2

REFERENCES

1. HUD, Regulatory Impact Analysis, Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980, Docket No. FR- 6124-P-01, at 6-8 (April 15, 2019).

2. Center on Budget and Policy Priorities. Demographic Data Highlight Potential Harm of New Trump Proposal to Restrict Housing Assistance. July 1, 2019. Available at:
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5. Shonkoff JP, Garver AS. The Lifelong Effects of Early Childhood Adversity and Toxic Stress. *Pediatrics* 2012;129(1):e20162595