

Guide on Submitting Public Comments to the Federal Register

Instructions:

1. Direct Link: <https://www.regulations.gov/comment?D=HUD-2019-0044-0001>

– OR –

Visit www.regulations.gov and enter “**HUD-2019-0044-0001**” into the Search field. The HUD proposed rule will appear at the top of the search list – entitled “**FR-6124-P-01 Housing and Community Development Act of 1980: Verification of Eligible Status.**” Click the “Comment Now!” button to the right of the title.

2. Attach as PDF (recommended) or copy comment into text field. Complete the fields for contact information – only fields for First and Last Name are required, though for confidentiality you may choose to instead provide last initial. Hit “Continue” button to preview before submitting.

3. Submit! Save your receipt. Reminder: Deadline to submit is **July 9th at 11:59PM ET.**

– OR –

Shortcut: Visit <https://www.keep-families-together.org/comment> to use their submission form. National Housing Law Project (NHLP) and National Low Income Housing Coalition (NLIHC) are national housing coalitions spearheading the response to the HUD proposed rule. Note: This form does not provide you with the option to attach files.

The screenshot shows a web form titled "Submit Your Comment Opposing HUD's Proposed 'Mixed-Status' Rule". At the top, there is a text input field labeled "Full Name" with a required field asterisk (*). Below this is a dark blue button with a white envelope icon and the text "Submit Comment". Under the button, the form is addressed to "Dear HUD Email (show details) ,". The main text area contains a pre-written comment: "I am writing to strongly oppose HUD's proposed rule that could cause more than 100,000 people to be evicted from their homes, including more than 55,000 children who are U.S. citizens or have legal status. While HUD argues the proposed rule is needed to address long wait lists for housing assistance, HUD's own analysis shows that the proposed rule will result in fewer families receiving federal housing benefits." Below this text is a placeholder "[Insert personal stories that illustrate the importance of housing access]". Further down, another line of text reads "We all share the concern that millions of U.S. households struggle to find affordable housing in the ongoing". Below the text area, there is a "Regards," line followed by placeholder text "[@advFirst] [@advLast]". At the bottom of the form, there are two checked checkboxes: "Send me emails about this campaign" and "Send me text messages about this campaign". The footer of the form states "© 2019. All rights reserved. Subject to Privacy Policy."

DO's:

- **Target criticisms to the actions proposed.** Explain the likely impact to our patients and community this proposed rule would have if finalized.
- **Establish your credibility in the issue area.** Explain why you are uniquely qualified to offer this perspective, e.g. safety-net care provider to immigrant patients, an immigrant or member of an immigrant community, a housing subject matter expert, etc.
- **Humanize the problem by sharing a personal story.** Share your insight into the lives of those who would be affected by the proposed rule. You may also consider sharing your own story about the role that (affordable) housing has played in your life or the life of someone close to you, even if you/they are not an immigrant, in order to demonstrate what not having access to these resources would mean.
- **Submit separate comments in your own words.** Agencies need to count how many comments they receive. Five people or organizations signed onto one comment letter counts as one comment vs. five comments if each person or organization sent in their own comments.
- **Understand that the comment process is not a vote.** One well supported comment is often more influential than a thousand form letters. Agency staff must read and respond to all comments, and the process is very different if they have to consider what's unique to each comment. It's fine to work from a sample comment, but you should modify it to reflect your own thoughts and experiences so that it adds to the factual record.
- **Provide translations of non-English comments or quotes.** All comments must be submitted in English. Translations ensure that comments from non-English speaking individuals are counted.

DON'Ts:

- **Don't direct criticism at "Trump" or "the Administration."** While it can be tempting to use your comment as an outlet to vent your frustrations with the Administration in general, the most effective approach is to focus on the proposed policy changes and their impact. Given that at BMC we are heavily dependent on discretionary Federal funding, it is particularly important to strike this tactful balance when using your institutional credentials.
- **Don't suggest corrective language.** Our ultimate goal is to stop this rule from moving forward. Therefore, while it is important to raise concerns, we do not recommend suggesting ways that the agency can "fix" the proposed language (Note: under other circumstances, this might be advantageous).
- **Don't discuss programs that aren't specifically included in the proposed rule.** Highlighting programs that are not specifically mentioned could give the agency cover to include those programs in the final rule, even though they aren't in the proposed rule.
- **When possible, avoid completely anonymous comments.** If an individual does not want to disclose their name or contact information, we recommend having a friend or representative submit the comment on their behalf rather than submitting the comment anonymously. A health worker or attorney could submit comments on behalf of multiple clients, and should acknowledge their relationship to that person in the comment to provide context/legitimacy.

**Guidance adapted from the [Protecting Immigrant Families \(PIF\)](#) campaign materials on public charge, and revised for the purposes of the HUD proposed rule.*