



Comments in Support of Proposed Resolution 19-4750

Good Morning Commissioners,

My name is Emily Coffey and I am a housing justice staff attorney at the Shriver Center on Poverty Law. I am here to testify in favor of the proposed resolution opposing HUD's proposed rule on the verification of eligible status. Thank you to President Preckwinkle, Commissioner Anaya, Commissioner Suffredin, Commissioner Degnen and Commissioner Kevin Morrison for bringing forward this important resolution.

The Shriver Center vehemently opposes the proposed changes to HUD's verification of immigration status rule which would greatly, and without justification, impose significant harm on low-income families living in or eligible for certain HUD subsidized housing programs. The proposed rule would change longstanding policies that allow families with mixed immigration status to live together while the ineligible immigrant family members pay their market share of the rent. It would further impose significant burdens on all affordable housing residents by increasing the documentation required to qualify for housing, and place unnecessary administrative burden on housing providers including the Housing Authority of Cook County.

The proposed rule threatens the health and wellbeing of children by effectively evicting over 55,000 children who are eligible for the covered housing programs. Mixed status families will have to make the excruciating decision to either face eviction or separate as a family in order for some to remain stably housed. This includes families housed by the Housing Authority of Cook County. We urge the Housing Authority to collaborate with other county and state agencies to create a plan that ensures that these families can remain housed together in other programs should the rule go into effect.

HUD's unnecessary, cruel proposed rule also does nothing to address the affordable housing crisis facing families in Cook County and in fact will only exacerbate it. Although HUD contends that the proposed rule is a means of addressing the waitlist crisis faced by Public Housing Authorities nationwide, HUD's own analysis concludes that fewer, not more, families are likely to receive assistance as a result of the rule. We share the concern that millions of households across the country and thousands of households across Cook County struggle to find affordable housing in the ongoing affordable housing crisis. But blaming struggling immigrant families will not fix this problem. **The real issue is the lack of sufficient funding to ensure that every family, regardless of immigration status, has access to one of the most basic of human rights—a safe place to call home.**

The proposed rule will also hurt all people struggling with housing stability by making it more difficult to access affordable housing programs. In addition to attacking mixed status families, the proposed rule creates wholly unnecessary red tape that threatens housing security for ALL

households currently receiving HUD assistance and all future citizen applicants seeking these benefits. The rule would require that all who already declare they are U.S. citizens under penalty of perjury provide evidence of their citizenship, a practice that has proven to be burdensome, costly and unnecessary to protect program integrity. The proposed rule would require that these individuals also provide documentary proof of citizenship or nationality which can be extremely difficult for populations most in need of affordable housing. It is well documented that as many as 7% of U.S. citizens do not have citizenship documentation readily available and seniors, survivors of domestic violence, people of color, people with disabilities, and people who have experienced homelessness are the most likely to lack these documents. Unnecessary proof of citizenship documents will do nothing but burden housing providers and create barriers to housing for the most vulnerable members of our society.

Thank you again for the opportunity to testify today in support of this proposed resolution.