

Public Comments Received Concerning HRA's Proposed Rule:
Amendments to the Rules Concerning the IDNYC Program

A public hearing regarding the proposed rule was held on June 13, 2018. At the hearing, interested parties had an opportunity to provide input on the proposed rule. Approximately five members of the public attended the hearing, two of whom spoke based on the attached written testimony. Colette Samman, Deputy Commissioner, IDNYC, Maritere Arce, DSS Chief External Affairs Officer, and Sonia Lin, General Counsel and Policy Director for the Mayor's Office of Immigrant Affairs (MOIA), introduced the hearing.

No comments were received via the New York City Rules website, or at the fax number or mailing address provided on the notice of public hearing.

WRITTEN TESTIMONY SUBMITTED AT THE JUNE 13 PUBLIC HEARING

CATHOLIC COMMUNITY RELATIONS COUNCIL

80 Maiden Lane, 13th Floor, New York, New York 10038

Testimony of Joseph Rosenberg
Director of Catholic Community Relations Council
Proposed Rules for the IDNYC Program
June 13, 2018

Good morning. I am Joseph Rosenberg, Executive Director of the Catholic Community Relations Council ("CCRC"), representing the Archdiocese of New York and the Diocese of Brooklyn on legislative and policy issues before the Mayoral Administration, New York City agencies and the New York City Council. I am here in support of the proposed rules modifying the IDNYC program.

We strongly supported the creation of the IDNYC Card, having testified before the City Council and the Mayor on this landmark initiative. Once the program was established, churches and schools of both the Archdiocese of New York and the Diocese of Brooklyn, at the request of the Mayor's Office of Immigrant Affairs ("MOIA"), operated as "temporary pop-up" centers in neighborhoods that were far from the City's registration centers. As a result many NYC residents, within walking distance of these schools and churches, were able to register for the IDNYC Card.

The IDNYC Card is accurately described as benefiting all New Yorkers in providing access to government services, but has been especially targeted towards the immigrant community in our City. Providing such services to these New Yorkers is a core mission of Catholic Charities of the Archdiocese of New York and Catholic Charities of Diocese of Brooklyn. These charitable organizations provide legal representation, housing referrals, vocational training and English language courses for this underserved population.

We have always urged that the eligible age to obtain the IDNYC Card be 10 years and not 14 years of age. We are therefore very pleased and strongly support the proposed rule that lowers the minimum age to obtain the Card to 10 years of age.

Students from age 10 to 14 receive identification cards which they are required to present at school entrances and for admission to cultural events and other institutions. There is no reason to withhold the IDNYC Card from students under the age of 14. The proposed rule corrects this lapse and acknowledges that these young individuals can benefit from the protections and access that is provided by the IDNYC card. The rules also require that all cards issued to children ages 10-14 contain an emergency contact number for the card's holder. This provision can help provide parents of these children with peace of mind knowing that police and other first responders can contact parents and guardians in the event the child becomes lost or is in danger.

We strongly support this proposed rule change. It will create a new and young class of New Yorkers able to benefit from this innovative and successful program.

Thank you.

IDNYC ISSUES/RESOLUTIONS

1. Verification of Release only accepted if dated within 1 year. Can the time limit be eliminated since identity would remain the same and it is a government document?
2. Accept documents/letters from All NYC Universities asserting an individual's identity/residency. Since these are NYC institutions, they should be accepted
3. Accept letters from immigration agencies (USCIS, EOIR) to prove address
4. Variation office to office on documents accepted
 - a. "unofficial lease" is a good policy, but unofficial lease was not accepted by Flushing Branch Library
 - b. Who do we contact about this? Only the website?
 - c. Retraining of staff?
5. Which representative of a nonprofit must provide a letter asserting their client is homeless or a victim of domestic violence? Case Manager? Attorney? Program Director?
 - a. Format for this letter?
 - b. Can this initiative be expanded where a similar letter would be written for individuals who cannot prove address but can prove residency, if the individual has a letter from a nonprofit?

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