

**UNITED STATES DISTRICT COURT
DISTRICT OF THE DISTRICT OF COLUMBIA**

OPEN COMMUNITIES ALLIANCE,
CRYSTAL CARTER, TIARA MOORE

Plaintiffs,

v.

BEN CARSON, SECRETARY OF
HOUSING AND URBAN DEVELOPMENT,
IN HIS OFFICIAL CAPACITY, U.S.
DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT

Defendants.

Civ. Action No. 1:17-cv-02192 (BAH)

Chief Judge Beryl A. Howell

DECLARATION OF SHERYL SEILING

1. My name is Sheryl Seiling. I am the Director of the Housing Choice Voucher program for the Housing Authority of Cook County (HACC) in Chicago, Illinois, a position I have held for nine years. I oversaw the implementation of the Small Area Fair Market Rent demonstration for HACC.

2. The SAFMR demonstration was extremely successful in Cook County, and helped many HCV families move to lower poverty and less segregated areas. In our survey of these families, significant numbers of them reported improvements in their stress levels, physical health, and feelings of community support (see attachment). At the conclusion of the demonstration project, HACC requested permission from HUD to continue using the SAFMRs.

3. The SAFMR demonstration was limited to our jurisdiction in Cook County, and did not extend to other parts of the metropolitan area, including Lake County and DuPage County.

In contrast, the mandatory SAFMR rule extends SAFMRs throughout the metropolitan area. This would significantly expand the ability of Chicago voucher families to access rental units in DuPage and Lake Counties, where there are many high opportunity neighborhoods.


4. We did not experience significant software development costs or staff training costs in the implementation of the SAFMR demonstration, because we had already been applying different payment standards (above and below the FMR) in different parts of the county.

5. We did not experience significant cost burdens for families in neighborhoods where FMRs decreased as a result of the use of small area FMRs. That was because we were already strictly enforcing HUD “rent reasonableness” rules in those neighborhoods rather than paying landlords vouchers based on the full payment standard where the private market would not support such rents. In any event, even for PHAs that have not strictly observed rent reasonableness standard, existing tenants are protected under the final SAFMR rule from steep rent increases. These protections were not available in the SAFMR demonstration.

6. For a major regulatory change like the mandatory SAFMR, I would have expected HUD to issue guidance in early 2017, for implementation in January 2018. I do not understand why this was not done. Nonetheless, although HUD and the affected PHAs now will have to act more quickly, I believe it would not take more than a couple of months for the PHAs covered by the rule to begin using small-area FMRs effectively. It would be helpful for HUD to provide some technical assistance to PHAs that are covered by the SAMFR rule, so that those PHAs can learn from our experiences in Cook County and other places using varied payment standards,

rather than having to “reinvent the wheel.” We would be happy to assist HUD in such technical assistance efforts, by sharing our experience in webinars, or by sharing our briefing materials.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Executed: 11/2/2017

Survey Outcomes

Reasons for Enrollment:

- 1.) Security Deposit Incentive
- 2.) Better Community
- 3.) Better Schools

School Adjustment: 86% of clients described their children's adjustment to their new school as "good" or "excellent" while the remaining 16% fell into the "poor" or "fair" categories.

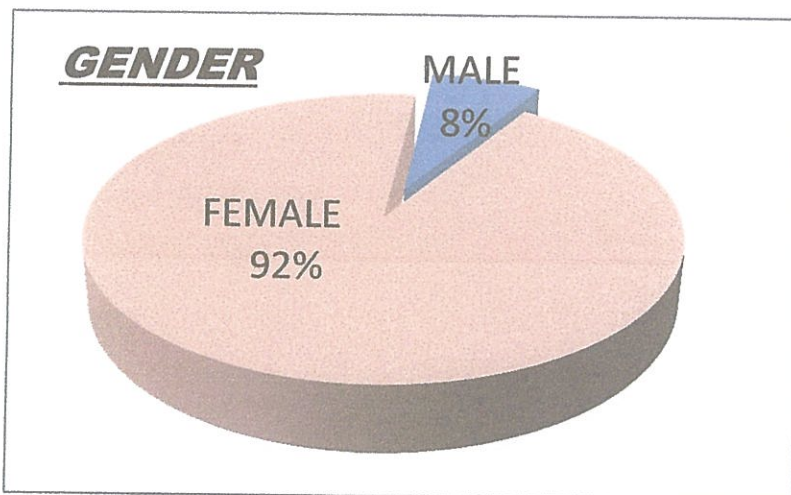
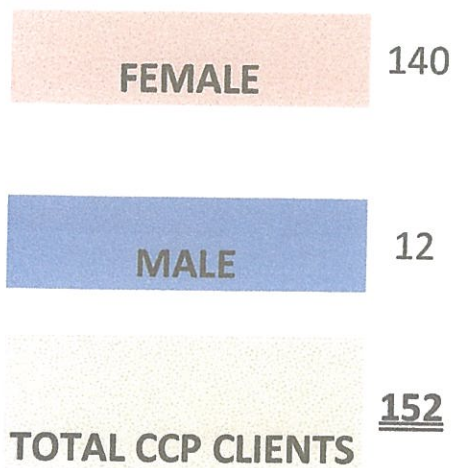
Stress Levels: 81% of clients relayed that their stress levels had improved since moving to their new neighborhoods. 12% said their stress levels remained the same, while 7% said their stress levels had worsened.

Physical Health Status: 49% of clients relayed that their household's overall physical health status had improved since their opportunity move. 42% said it remained the same, while 9% relayed a decline in overall physical health status.

Community Support: 55% of clients relayed an increased perception of community support in their new neighborhoods, while 32% said their experience of community support was the same as their old neighborhood. 13% relayed a decline in community support.

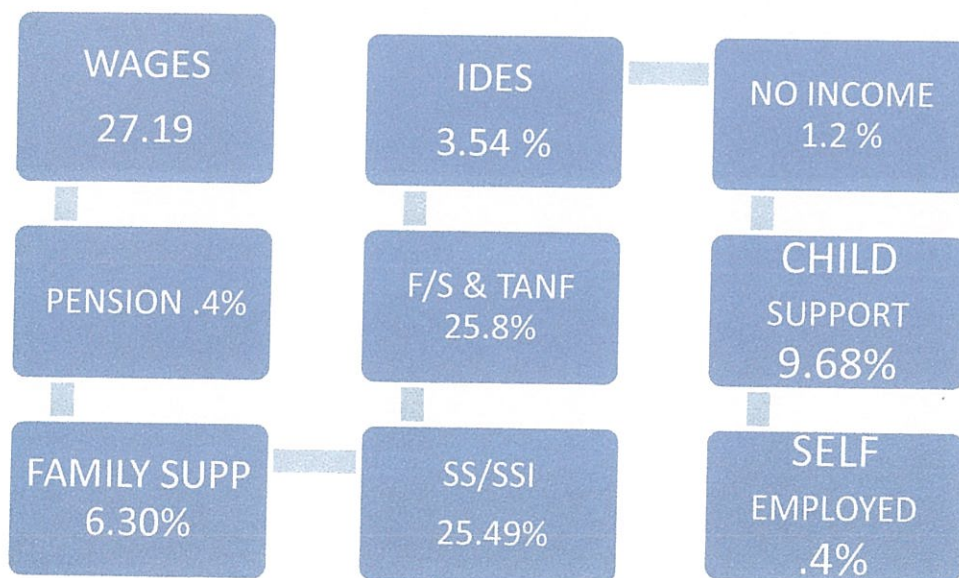
Overall Satisfaction: 96% of clients responded "yes" when asked if they were pleased with their opportunity move overall.

Retention: 88% of clients relayed that they were planning on renewing their lease at the end of their first year.

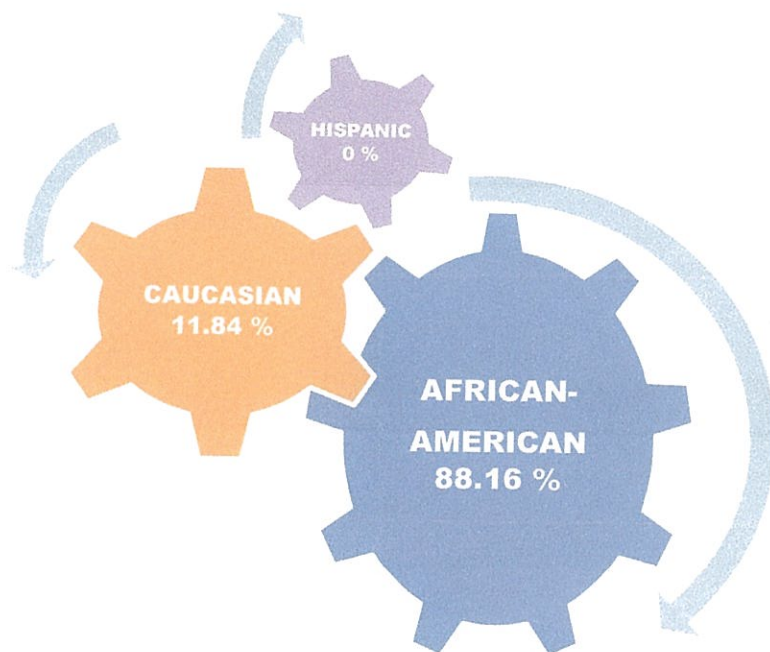


"Age: The Youngest is 24 years old & the eldest is 87 years old. The average age for the women is 44 & for the men is 57 years old."

INCOME CHART



RACE/ETHNICITY



AFRICAN AMERICAN
134 CT.

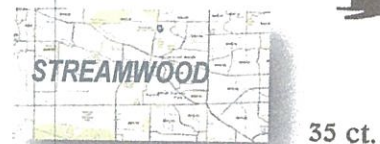
CAUCASIAN
18 CT.

HISPANIC -
0 CT.

"Children that moved to Opportunity Households: The count is 195."



22% of our clients Opportunity Moves is to -



12% of our clients Opportunity Moves is to -



11% of our clients Opportunity Moves is to -



9% of our clients Opportunity Moves is to -



5% of our clients Opportunity Moves is to -



3% of our clients Opportunity Moves is to -

