



**CATHOLIC CHARITIES**  
*of St. Paul and Minneapolis*

**Office for Social Justice**  
60 Plato Boulevard East, Suite 230  
St. Paul, MN 55107  
651-647-2588  
[cctwincities.org/advocacy](http://cctwincities.org/advocacy)

December 18, 2013

Judge Eric L. Lipman  
Office of Administrative Hearings  
600 North Robert Street  
P.O. Box 64620  
Saint Paul, Minnesota 55164-0620

Re: Comments on Proposed Election Rules Changes (Ch. 8200)

Dear Judge Lipman:

In response to the Office of the Secretary of State's Proposed Election Rules Changes to Address Same-Day Registration Options for Voters; Reduce Errors in Absentee Ballot Process, Catholic Charities wishes to comment on the office's expansion of the types of documents allowable for proof of identification and proof of residence (Chapter 8200.5100, subp. 2.A and 2.B).

During the period of public comment, Catholic Charities proposed several expansions to the list of acceptable photo identification cards (8200.5100 subp. 2.A). We were pleased to see that the Secretary of State elected to include out-of-state driver's licenses or identification cards, high school student photo IDs, and a clarification to solidify driver's permits as identification in the proposed election rules changes. These additions will make it significantly easier for eligible voters staying in our shelters, transitional housing, and supportive housing units to register to vote if they do not have the financial or other means to obtain an in-state license or ID card.

Catholic Charities also recommended changes to the list of documents acceptable for proof of residence during same-day registration (8200.5100 subp.2.B). Many of the changes we support were included in the Secretary of State's proposal, including banking and credit card statements, rent or mortgage statements that do not itemize utilities, and start-of-service notifications. Such changes will again increase the likelihood that eligible voters living in poverty will have the required documentation to be able to vote.

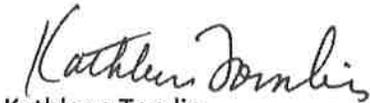
One recommendation the Secretary of State did not include in the rules changes recommendations was a piece of mail from a governmental entity as proof of residence. As an agency whose medium- and long-term residences are funded largely through the state's Group Residential Housing program, many of our clients do

not receive a rental agreement that includes itemized utilities, as law currently requires. However, we believe that the office's decision to include non-itemized rent statements will meet the needs of clients in GRH, alleviating our agency's concern that these voters have proof of residence.

Catholic Charities makes these comments with our current annual client base of 32,000 in mind, along with our vision of poverty for no one; opportunity for everyone. The right to vote is crucial to a democracy that represents everyone, particularly those most in need. We thank the Secretary of State for expanding the opportunity for people living in poverty to access this right.

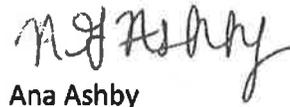
Thank you for the opportunity to submit comments on draft amendments to these rules.

Sincerely,



Kathleen Tomlin

Vice President of Social Justice Advocacy



Ana Ashby

Public Policy Organizer