



PROTECTING RIGHTS ACROSS CONTEXTS AND INTERNATIONAL SHARING (PRAXIS)

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DMC

DePaul Migration Collaborative, DePaul University
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ABOUT THE DEPAUL MIGRATION COLLABORATIVE

Founded in 2022, The DePaul Migration Collaborative (DMC) builds on DePaul's long legacy as an immigrant-serving institution and shares in its core Vincentian value to welcome the stranger. Part of this legacy includes the work of the Asylum and Immigration Law Clinic (1996) and the launching of the Refugee and Forced Migration Studies (RFMS) program (2015). The DMC, a joint venture of the College of Law and the College of Liberal Arts and Sciences, embodies DePaul's dedication to interdisciplinary research and advocacy in migration and human rights, seeking systemic change through education and collective action.

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Joshua Friedman was responsible for project oversight and its written outputs. Working with Josh for the whole of the research, analysis, and writing throughout the PRAXIS project were three student researchers:

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The opinions expressed in the report are those of the author and do not necessarily reflect the views of DePaul University, DMC, Schreiber Philanthropy, or WU.

ABBREVIATIONS

Abbreviation	Full Name / Description
BBU	Austrian Federal Agency for Reception and Support Services (Bundesagentur für Betreuungs- und Unterstützungsleistungen)
BFN	IDHS Bureau of Family Nutrition
BIPOC	Black, Indigenous, and People of Color
BMS	Austrian Needs-Based Minimum Social Benefit scheme (bedarfsorientierte Mindestsicherung)
BOKU	University of Natural Resources and Life Sciences, Vienna (Universität für Bodenkultur Wien)
C3	C3-Library for International Development (C3-Bibliothek für Entwicklungspolitik)
CBO	Congressional Budget Office
CBRAP	Illinois Court-Based Rental Assistance Program
CESCR	United Nations Committee on Economic, Social and Cultural Rights
CHA	Chicago Housing Authority
CITI	Collaborative Institutional Training Initiative
CSFP	Commodity Supplemental Food Program
CSOs	Civil Society Organizations
CWS	Church World Service (NGO)
DACA	Deferred Action for Childhood Arrivals
DCEO	Illinois Department of Commerce and Economic Opportunity
DFSS	City of Chicago Department of Family and Support Services
DMC	DePaul Migration Collaborative
DRL	U.S. Department of State in the Bureau of Democracy, Human Rights and Labor
ECHR	European Court of Human Rights
ECRE	European Council on Refugees and Exiles
EU	European Union
EUR	Euro (currency)
FAO	United Nations Food and Agriculture Organization
FEC	City of Chicago Food Equity Council
FERPA	Family Educational Rights and Privacy Act
FGDs	Focus Group Discussions
FPÖ	Freedom Party of Austria (Freiheitliche Partei Österreichs)
GC	General Comment
GCFD	Greater Chicago Food Depository
GV	Austrian Basic Welfare Support scheme (Grundversorgung)
HHS ORR	U.S. Department of Health and Human Services Office of Refugee Resettlement
HRC	United Nations Human Rights Council
HUD	U.S. Department of Housing and Urban Affairs

Abbreviation	Full Name / Description
ICCPR	International Covenant on Civil and Political Rights
ICESCR	International Covenant on Economic, Social, and Cultural Rights
ICIRR	Illinois Coalition for Immigrant and Refugee Rights
ICNA	Islamic Circle of North America (NGO)
IDHS	Illinois Department of Human Services
IDPs	Internally Displaced Persons
IHDA	Illinois Housing Development Authority
IRB	Institutional Review Board (DePaul)
IWCs	Illinois Welcome Centers
JCFS	Jewish Child and Family Services (NGO)
KIIs	Key Informant Interviews
LIHEAP	Low Income Home Energy Assistance Program
LIHWAP	Low Income Household Water Assistance Program
NGOs	Non-Governmental Organizations
OHCHR	Office of the United Nations High Commissioner for Human Rights
OSI	One System Initiative
OSMEA	Online System for Managing Ethics Approval (WU)
PIR	Practitioner in Residence
PRaXIS	“Protecting Rights Across Contexts and International Sharing” research project
PRM	U.S. Department of State Bureau of Population, Refugees, and Migration
PWDs	People with Disabilities
RAN	Refugee Action Network
RAP	Rental Assistance Program
RLI	University of London Refugee Law Initiative
RSD	Refugee Status Determination
SBE	Social-Behavioral-Educational (research)
SDGs	Sustainable Development Goals
SIV	Special Immigrant Visas
SNAP	Supplemental Nutrition Assistance Program
SOPs	Standard Operating Procedures
SR R2F	Special Rapporteur on the Right to Food
SR R2H	Special Rapporteur for the Right to Adequate Housing
TPS	Temporary Protected Status
UN-Habitat	U.N. Human Settlement Program
UNHCR	Office of the United Nations High Commissioner for Refugees
UPR	Universal Periodic Review
USD	U.S. dollar (currency)
USDA	U.S. Department of Agriculture

Abbreviation	Full Name / Description
VCLT	Vienna Convention on the Law of Treaties
VIDC	Vienna Institute for International Dialogue and Cooperation
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children
WU	Vienna University of Economics and Business (Wirtschaftsuniversität Wien)

EXECUTIVE SUMMARY

“Protecting Rights Across Contexts and International Sharing” (PRAXIS) investigated how law, policy, and practice in Chicago, Illinois, USA and Vienna, Austria can better safeguard the right to adequate housing and the right to adequate food for refugees and asylum seekers. The project used insights from comparative analyses of these diverse urban contexts in the developed countries of the Global North using the lenses of the right to adequate food and the right to adequate housing spelled out in Article 11 of the International Covenant on Economic, Social, and Cultural Rights (ICESCR).

The PRAXIS project had three specific **objectives**:

- To increase understanding of legal and integration needs and frameworks of forced migrants in Chicago and Vienna for food and shelter, using a comparative approach.
- To develop practical legal and policy recommendations promoting forced migrants’ rights and integration regarding food and shelter at local and state levels.
- To engage the DMC and the broader DePaul community in protecting the rights of forced migrants based on an evidence-driven, comparative project approach.

Progress towards the specific objectives enumerated above was measured based on three **expected outcomes** of the PRAXIS research:

- i. Provided documentation about the status of and needs around the right to adequate shelter and healthy food for forced migrants in Chicago and Vienna.
- ii. Generated evidence-based recommendations on how to strengthen rights and integration, especially around shelter and food, for forced migrants living in Chicago and Vienna that can be applicable beyond those cities as well.
- iii. Engaged the DePaul community on forced migrants’ rights to adequate shelter and healthy food through consultation and presentation events.

The main **targeted communities** for the PRAXIS research were Afghan residents in Vienna and Chicago. The research also engaged Iraqis, Syrians, and Rohingya populations. Iraqis and Syrians participated in the data collected in Vienna and were intentionally by the researchers to complement the larger population of Afghans sampled.

This was done through an **evaluation design and approach** that utilized three types of data collection:

- Desk research and literature review of law and policy impacting forced migrants’ housing and food contexts in both Chicago and Vienna;
- 34 key informant interviews (KIs) with 36 key Informants, including NGO representatives, academics, government officials, and other relevant stakeholders and the substantial majority were working in the refugee, food, or housing fields in Chicago and Vienna;
- Eight focus group discussions (FGDs) with a total of 91 participants from the Afghan, Syrian, and Rohingya refugee and asylum seeker communities in Chicago and Vienna, the majority of which were women.

Research, data collection, and analysis for the PRAXIS project took place in Chicago and Vienna from 15 January to 14 June 2025, and this Final Report was submitted 19 July 2025. In addition to the sponsorship of and deep engagement with DMC and DePaul University in Chicago, the research benefitted from the collaboration of the Vienna University of Economics and Business

(WU). Despite some limitations and challenges, particularly due to the worsening political situations for refugees and asylum seekers in the U.S. and Austria, as well as time constraints limiting the amount of data collection possible, the researchers mitigated any safety concerns and completed the research through, in part, preserving refugee confidentiality and safety.

The research identified 11 core **findings** that show the refugees and asylum seekers need additional support to fully realize their rights to adequate food and adequate housing. Specifically, the findings were:

- **Finding 1:** Food is generally available and accessible to refugees and asylum seekers in Chicago and Vienna.
- **Finding 2:** Refugees and asylum seekers prefer fresh, local, and culturally appropriate food, which is often lacking.
- **Finding 3:** Rent for private apartments was too high for refugees without monetary support and public housing was often difficult to access.
- **Finding 4:** Legal status determines access to services.
- **Finding 5:** It was very difficult for refugees and asylum seekers without credit or work histories to find adequate housing, which was amplified by discrimination.
- **Finding 6:** Limited support for refugees to “know your (tenant) rights”.
- **Finding 7:** Legal security of tenure was precarious for many refugees and asylum seekers.
- **Finding 8:** The NGO sector in both Chicago and Vienna deliver the vast majority of services to refugees and asylum seekers well, but are constrained by funding limitations and lack of capacity to plan strategically.
- **Finding 9:** Fractured service provision by program and agency decreases effectiveness.
- **Finding 10:** Coordination by the government is generally weak, although stronger in certain, specific areas like with refugee resettlement agencies.
- **Finding 11:** Food and housing increasingly understood using human rights language.

Relying on the Findings, Ten **Recommendations** were made based on the results of the PRAXIS research project. Specific target groups were suggested for each of the Recommendations. These Recommendations are summarized below with the Conclusions from which they arise and the target groups to which they are directed in parentheses after each individual Recommendation:

Strengthening protection of the right to adequate food

- **Recommendation 1:** government, NGOs/CSOs, and refugee communities need to **raise the salience of diverse, culturally-appropriate, and nutritious food.** *(based on Conclusions 1 and 3);*
- **Recommendation 2:** government promulgation and NGO/CSO advocacy to **administratively ease uptake of food benefit programs.** *(based on Conclusions 1 and 3);*

Strengthening protection of the right to adequate housing

- **Recommendation 3:** government and NGO/CSO stakeholders in close collaboration with refugee communities **develop a refugee and housing integration strategy.** *(based on Conclusions 2 and 3)*
- **Recommendation 4:** government working with NGO/CSO stakeholders **increase housing supply and housing subsidies.** *(based on Conclusions 2 and 4)*
- **Recommendation 5:** government promulgation and NGO/CSO advocacy to **prohibit considering a recognized refugee credit scores and disallowing “risk fees” or security deposits more than one month of rent.** *(based on Conclusions 2 and 5)*

Simplify and streamline refugee housing and food assistance

- **Recommendation 6:** government promulgation and NGO/CSO advocacy to **generally reduce administrative and bureaucratic barriers for refugee food and housing support.** *(based on Conclusions 1-3, 5)*
- **Recommendation 7:** government support with NGO/CSO staffing and implementation to **increase one-stop shops for refugee benefits staffed by multiple agencies.** *(based on Conclusions 1-4)*

Improve coordination of service providers

- **Recommendation 8:** government and service providers work together to **establish inclusive, comprehensive coordination mechanisms for food and housing rights of refugees.** *(based on Conclusions 4)*

Conduct supportive capacity development

- **Recommendation 9:** NGOs and CSOs should **develop and deliver capacity development for refugees and asylum seekers to facilitate their housing and food support.** *(based on Conclusions 1-2)*
- **Recommendation 10:** *government and NGOs/CSOs* **develop “know your housing rights” outreach and awareness-raising.** *(based on Conclusions 2 and 5)*

These recommendations provide concrete suggestions and guidance for governmental and non-governmental stakeholders to strengthen the protection of refugees’ rights to adequate food and housing. While some or all of these Recommendations may seem wholly unachievable in the present political context when laws are increasingly being passed to restrict benefits for refugees and asylum seekers. The evidence argues for simplification, and refugee support stakeholders should to argue to reduce barriers not raise them, particularly in the face of bad faith demagoguing about forced migrants by politicians.

INTRODUCTION



“Vienna must not become Chicago.”

In 1996, the lead candidate for the far-right Freedom Party of Austria (FPÖ, *Freiheitliche Partei Österreichs*) in Vienna, Austria state elections, Rainer Pawkowicz, used this phrase as his campaign slogan.¹ Posters appeared all over Vienna during that election campaign bearing that anti-migrant attack: „Wien darf nicht Chicago werden!“ The FPÖ candidate made clear that he thought Chicago, Illinois, USA was full of immigrants, and that it was self-evident that a city full of migrants was bad.² This was not the first time that rightist politicians in Vienna used the specter of the City of Chicago as a symbol “for crimes generated by immigrants,” as Chicago appeared on FPÖ campaign posters as early as 1991.³ The campaign ad’s importance is shown by its placement in the main exhibition of the House of Austrian History (*Haus der Geschichte Österreich*), the dedicated museum of the country’s history in the center of Vienna, as an example of the struggle to define political belonging in Austria after World War II.⁴

This political spat from 30 years ago echoes today as both American and Austrian politics have seen a rising tide of anti-migrant rhetoric and anti-migrant action by the government.⁵ It also suggests that comparing the integration of refugees in Chicago and Vienna has salience

¹ Please note that throughout this report, German language words will be italicized. German names may be included in parentheses after English versions in the text, as in the footnoted sentence here, or vice versa where appropriate, with the goal to enhance readability while providing clear references to specific concepts or entities. Additionally, whenever possible, cited websites have been shared with their original addresses and also with Perma.cc links to create a permanent record of the web sources cited. Perma.cc links appear in brackets following the original address. See <https://perma.cc/> for more details.

² UPI, “Chi mayor turns down Austrian invite,” *website*, (6 Oct. 1996) available at <https://www.upi.com/amp/Archives/1996/10/06/Chi-mayor-turns-down-Austrian-invite/1563844574400/> [<https://perma.cc/6SSW-L65Y>].

³ Stephan Neuhäuser, *Coming to terms with the past: The Case of the “House of Austrian History” (Haus der Geschichte Österreich) in the wake of the rise of populist nationalism in Austria*, 1 MODERN LANGUAGES OPEN at 11 (4 Aug. 2020), available at <https://doi.org/10.3828/mlo.v0i0.326>.

⁴ See House of Austrian History, “New Ages: Austria since 1918,” *website*, available at https://hdgoe.at/new_ages_en [<https://perma.cc/6VBQ-JB3D>]; see also Dirk Raith, “Wien darf nicht Chicago werden. Ein amerikanischer Soziologe über Österreich, die Nazis und das IHS,” *ÖSTERREICHISCHE ZEITSCHRIFT FÜR SOZIOLOGIE* 26(3): 46-65 (2001) (being an example of the adoption of this phrase in Austrian academia in a variety of contexts).

⁵ See, e.g., Christian Paz, “3 theories for America’s anti-immigrant shift,” *Vox website* (24 May 2024), available at <https://www.vox.com/politics/351535/3-theories-for-americas-anti-immigrant-shift> [<https://perma.cc/BAL3-U4D9>], and Markus Wagner and Lukas Rudolph, “Backlash against asylum seekers in Austria,” *The Loop, European Consortium for Political Research’s Political Science Blog, website* (2021), available at <https://theloop.ecpr.eu/backlash-against-asylum-seekers-in-austria/> [<https://perma.cc/A4WH-9AXM>].

considering the decades-long rhetorical connection between the two cities regarding hosting migrants. This sort of comparative approach looking at how two large cities in different parts of the Global North protect and integrate migrants is relatively rare in both legal and social science research. What comparative work on migrant integration that has been done has not looked specifically at adequate housing and adequate food for large urban communities of forced migrants, including refugees and asylum seekers.

This gap is meaningful because food and housing are core elements of refugee and asylum seeker integration, for if these forced migrants do not have adequate food or housing, integrating into their new communities become substantially more difficult. Thus, as forced displacement from the Global South continues to grow, identifying and promoting best practice examples from communities in the Global North on protecting and integrating forced migrants by ensuring adequate housing and food assumes more importance. These examples can be most readily spotted when considering the actual integration experiences of refugees and asylum seekers.

A human rights lens must be used when looking at forced migrants and their integration as regards food and housing. Adequate food and adequate housing are human rights that impact the day-to-day lives of refugees and asylum seekers as much or more than political or legal process rights, but the interconnection between the law and policy frameworks for forced migrants in cities like Chicago and Vienna with the lived experience of those migrants concerning food and housing is also understudied.

For these reasons, the research study has investigated the rights to adequate food and adequate housing for refugees and asylum seekers in the contexts of Chicago and Vienna to generate evidence-based recommendations on how to strengthen rights and integration for refugees and asylum seekers in the urban areas of the Global North. The project took a comparative approach by looking at the legal, policy, and community contexts for refugees, asylum seekers, and other forced migrants in Chicago and Vienna by considering how issues around shelter and food both are formally framed and actually impact them from various perspectives, and comparing the findings from those urban environments to each other to identify good practice examples and learn from key differences.

The findings from the research then informed the development of practical recommendations to promote forced migrants' rights and integration in regard to food and housing, especially at the local and state levels. Throughout the PRAXIS project, its scope and course, as well as next steps based on the project's work, was determined in part by engaging with the DePaul community of faculty, staff, and students.

The political moment in the U.S. and Austria does not appear to be the time to worry about the expansion of the protection of refugee human rights. Instead, most human rights advocates and refugee support stakeholders are more concerned with staging a rearguard action to salvage whatever refugee protections can be saved in the face of aggressive and likely illegal attempts to restrict refugees' rights and deny their basic humanity.

The researchers argue that now, in this moment, advocates of refugee rights must stand up for them and demand their application to all. It is hoped that the PRAXIS research results embodied in this Final Report can support that defense and expansion of the essential human dignity of refugees and asylum seekers.

BACKGROUND AND SCOPE

a. Research Question and Scope

The primary research question for the PRAXIS project is how law, policy, and practice in Chicago, Illinois, USA and Vienna, Austria can better safeguard the right to adequate housing and the right to adequate food for refugees and asylum seekers, using insights from comparative analyses of these diverse urban contexts in the developed countries of the Global North. Both cities' experiences are analyzed using the lenses of the right of adequate food and the right of adequate housing spelled out in Article 11 of the International Covenant on Economic, Social, and Cultural Rights (ICESCR), which provides a consistent framework for analysis grounded in established international law principles.

When thinking about the human rights of forced migrants, researchers, stakeholders, and governmental duty-bearers tend to immediately think about issues around recognition of refugee status and the ability to stay in the country of asylum, and not about the rights to adequate food and housing. Additionally, the increasingly punitive stance taken by governments towards forcibly displaced people who are on the move outside of their home country as a result of a well-founded fear of persecution,⁶ means that their access to the legal system and whether they receive due process is the chief concern of most service providers and policy-makers in this field. Refugees and asylum seekers are entitled to a much broader range of rights than just these civil rights.

While perhaps less likely to result in immediate negative consequences than the denial of due process during immigration court proceedings, food and housing are fundamental to ensure that refugees and asylum seekers have an acceptable standard of living in their host countries. The right to adequate food and the right to adequate housing as delineated in the ICESCR guarantee the access and adequacy of food and housing for all people, including forcibly displaced persons. Also, as noted by an academic Key Informant interviewed as part of the qualitative research, the ICESCR does not differentiate between citizens and non-citizens in applying rights. Considering their precarious legal and economic statuses, the protections contained in these housing and food rights have a direct impact on the daily lives of refugees and asylum seekers in Vienna and Chicago as well as for forced migrants across the world.

Thus, the focus of the research is on the human rights to food and housing of forcibly displaced persons outside of their countries of origin, namely refugees and asylum seekers.⁷ In international refugee law as set forth in the 1951 Refugee Convention and the 1967 Refugee Protocol, an asylum seeker is someone who applied for refugee status, and a refugee is someone who has

⁶ See Convention Relating to the Status of Refugees, art. 1A(2), 28 Jul. 1951, 19 U.S.T. 6260, 189 U.N.T.S. 137 (laying out the internationally-accepted definition of refugee status, and thereby when someone is forcibly displaced).

⁷ Internally displaced persons (IDPs) due to persecution or conflict, as opposed to disaster-related displacements such as those from flooding or wildfires, are not present in significant numbers in the US or Austria, and have not be considered as part of the PRAXIS research. See Internal Displacement Monitoring Center (IDMC), "Country Profile: United States" *website* (last visited 16 July 2025), available at <https://www.internal-displacement.org/countries/united-states/> [https://perma.cc/G8WF-3B96]; and IDMC, "Country Profile: Austria" *website* (last visited 16 July 2025), available at <https://www.internal-displacement.org/countries/austria/> [https://perma.cc/A9HY-UY2N].

been adjudicated to have that status.⁸ Section 5 below discusses that there are numerous other types of protected status for people who can be broadly considered “forced migrants,” particularly in U.S. law, where there a number of different categories as well as using the same words with slightly different meanings. Similarly, there are also different types of subsidiary protection for migrants in Austria in addition to refugee status that is codified in Austrian federal law and which is also described in Section 5 of the report.

The main targeted communities for the PRAXIS research were Afghans resident in Vienna and Chicago. The research also engaged Iraqis, Syrians, and Rohingya populations. Iraqis and Syrians participated in the data collected in Vienna and were intentionally by the researchers to complement the larger population of Afghans sampled. Rohingya people were invited to participate in order to take advantage of an opportunity presented when a group of women Rohingya refugees asked to take part in a focus group conducted in Chicago.

These specific refugee and asylum seeker groups were targeted to reduce the number of variables in the research by having data collected from the same nationalities in both Chicago and Vienna, as Afghans, Iraqis, Syrians, and Rohingya are all present in measurable numbers in both cities. While the vast majority of forced migrants in Chicago are from Spanish-speaking countries – it is believed that 80% or more of migrants in Chicago are from countries like Colombia, Ecuador, El Salvador, Honduras, Mexico, or Venezuela – they are only present in negligible numbers in Vienna.⁹ While further research may show that nationality plays a role in accessing housing and food rights for forced migrants, this question was beyond the scope the PRAXIS research.

As will be described in the data collection discussion in Section 4(c) below, we did not ask participants in the data collection of this research for their legal status. However, based on the targeted national backgrounds of data collection participants (Afghan, Iraqi, Syrian, and Rohingya), the researchers believe that all of the participants were legally resident in the U.S. or Austria at the time of that the research was undertaken.

While Ukrainian refugee populations are also present in Chicago and Vienna in significant numbers, they are treated differently from some other refugee populations under local law regarding refugee food and housing provision. Additionally, existing Ukrainian communities in both places are well-established. Ukrainian individuals may also face less discrimination as they identify and are perceived as white.¹⁰ For these reasons, the experiences of Ukrainians may not be representative of all forced migrant residents in Vienna and Chicago. Again, future research may look to the different treatment of Ukrainians from other refugees as regards food and housing

⁸ See Convention, *supra* note 6, at art. 1A(2) (setting forth the internationally-accepted definitions of an asylum seeker and a refugee); see also UNHCR, “Who We Protect: Asylum-Seekers,” *website* (last visited 16 Jul. 2025), available at <https://www.unhcr.org/us/about-unhcr/who-we-protect/asylum-seekers>.

⁹ See Fred Tsao, “Illinois’ Undocumented Immigrant Population: A Summary of Recent Research,” *ICIRR report* (Feb. 2014), at 9, available at <https://robparal.com/wp-content/uploads/Illinois-Undocumented-Immigrant-Population.pdf> [<https://perma.cc/5JDM-RNNE>]; and Statistics Austria, “Migration & Integration – Statistical Yearbook 2024 Short Version,” (2024), at 17-18, available at https://www.bundeskanzleramt.gv.at/dam/jcr:1d48c237-fcab-4ea4-88b9-1668e1273a83/mig-int_stat_jahrbuch_2024-en.pdf [<https://perma.cc/T8X5-ZH85>].

¹⁰ See, e.g., Astrid Prange de Oliveira, “Fact check: Does the EU prioritize Ukrainian refugees?,” *DW website* (11 Dec. 2022), available at <https://www.dw.com/en/fact-check-does-the-eu-prioritize-ukrainian-refugees/a-63737885> [<https://perma.cc/VK6K-WVKT>].

to see what impact that had on the enjoyment of those rights, but that was also beyond the scope of this research.

b. Purpose and Objectives

As shown by its research question, the overall goal for the PRAXIS research project is to enhance the protection of the human rights to adequate food and housing for forced migrants through practical, scalable solutions by considering diverse contexts in the Global North.

Objectives Included:

- Increase understanding of legal and integration needs and frameworks of forced migrants in Chicago and Vienna for food and shelter, using a comparative approach.
- Develop practical legal and policy recommendations promoting forced migrants' rights and integration regarding food and shelter at local and state levels.

Progress towards the specific objectives enumerated above was measured based on two expected outcomes of the PRAXIS research:

- Provided documentation about the status of and needs around the right to adequate shelter and healthy food for forced migrants in Chicago and Vienna.
- Generated evidence-based recommendations on how to strengthen rights and integration, especially around shelter and food, for forced migrants living in Chicago and Vienna that can be applicable beyond those cities as well.

This Final Report evidences how the research project met the three specific objectives throughout. It also sets forth documentation on the outcomes in its Sections 5, 6, and 7 on the Legal Context, Findings, and Research Conclusions related to outcome (i); Section 9 on Recommendations related to outcome (ii).



RESEARCH AND DESIGN APPROACH

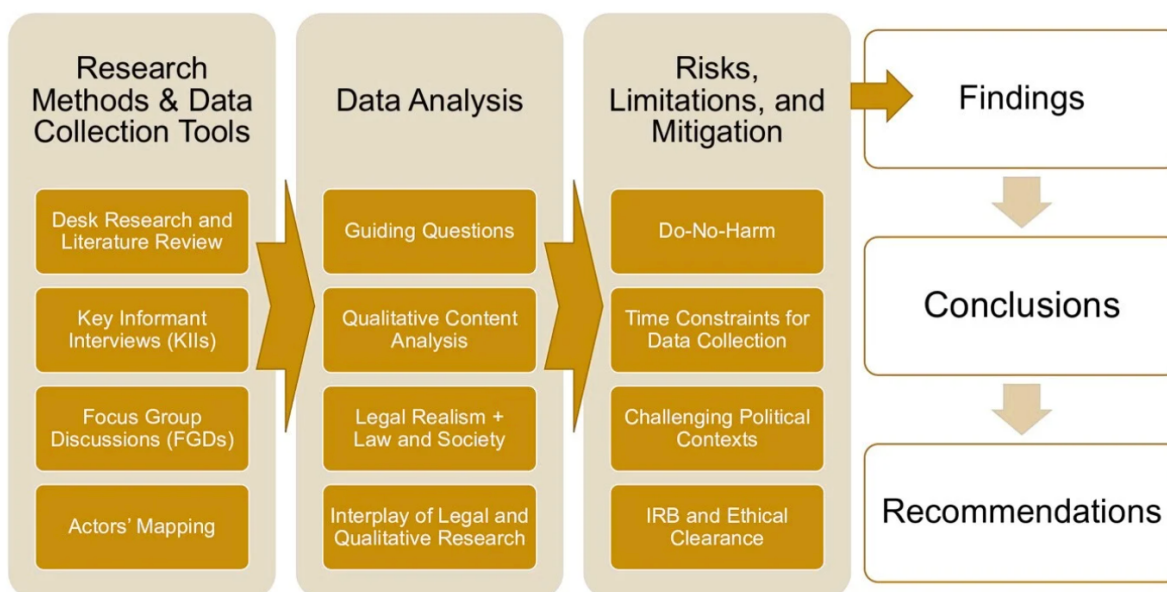
The PRAxIS research married relevant legal frameworks for human rights to adequate housing and adequate food with the lived experience of refugees and asylum seekers in Vienna and Chicago. The data collected demonstrated their protection needs related to food and housing, which led to the development of concrete recommendations to strengthen access to adequate food and adequate housing for forcibly displaced persons in both cities.

PRAxIS was grounded in a migrant-sensitive and migrant-centered approach that sought to address the knowledge gap for the rights to food and housing for refugees in urban settings in the Global North. Mixed methods using qualitative tools aimed to highlight and address the lived experiences, challenges, and needs of forced migrants in Chicago and Vienna regarding food and housing. The comparative approach utilized was practical and realist, looking at what works and what doesn't in both cities. The Recommendations in the Final Report are based on the Findings that came from the analysis of that qualitative research in context.

In this section, the research design, methodology, and methods of the PRAxIS research project are set forth. Then, the data collection instruments used to gather information from members of the targeted communities, governmental duty-bearers, non-governmental service providers, academics, and other stakeholders is also laid out in this section, as are the data analysis techniques that were employed and the limitations and risks encountered and mitigation measures taken as part of the research.

The analytical framework used in the PRAxIS research project and described in this section is set forth graphically in Figure 1 below.

Figure 1: Analytical Framework



a. Methodological Approach

Although this research was done in stable physical environments in two countries that rank highly in the Human Development Index,¹¹ a Rapid Assessment methodology was used to quickly deliver findings and recommendations that can be utilized promptly by migration stakeholders and policy-makers in rapidly changing refugee contexts in both Vienna and Chicago.¹² This real-time research technique was undertaken as the PIR research had a timeframe of approximately six months in length to collect and analyze the research data, as well conduct the other required activities of the PIR such as holding community events on related topics and delivering guest lectures for DePaul and WU classes, which are described in Section 8 of the Final Report.

Several different data collection techniques were used from different information sources – which are described in detail below – to ensure triangulation and corroboration of the data collected despite the rapid nature of the research. Additionally, cognizant of the needs and expectations that led to the PRAXIS research, a flexible design was used that served to allow the researchers to adapt to changing circumstances during the data collection and adjust to the situations faced on the ground in Chicago and Vienna. This flexibility was buttressed by a participatory approach to the design of the research that solicited input from, broader Chicago migration support communities. The researchers also conducted iterative adaptation of data collection and analysis techniques based on the feedback received from the targeted refugee communities in Chicago and Vienna as the data collection was being conducted. Experiences from the data collection process itself also served to inform subsequent data collection. Finally, academics from DePaul and members of the DMC provided ongoing support to the research with guidance throughout the whole the PIR project period.

One example of the participatory approach taken can be seen in the Participatory Workshop. This workshop brought together 16 refugee experts, service providers, and community members in Chicago to get input from them regarding the shape and course of the PIR research, specifically which aspects of the right to adequate food and right to adequate housing for refugees and asylum seekers were ripe to investigate based on the participants' knowledge of the context in Chicago. This was one of the ways that the researchers sought to obtain collaborative guidance from the Afghan, Iraqi, and Syrian refugee communities that are resident in Chicago as well as the service providers working with those communities. As the PRAXIS research was looking at their communities, their insights and suggestions directed the researchers to the topics most relevant to their lives and work. This feedback received at the Participatory Workshop has been used to strengthen research design and select participant categories and locations. This fast-moving yet collaborative approach enabled the Findings, Research Conclusions, and Recommendations developed as part of the research, and detailed in Sections 6, 7, and 9 of this Final Report, to have the type of specificity that allow them to be actioned by stakeholders.

b. Desk Research and Literature Review

The international law components of the right to adequate food and the right to adequate housing guided the desk research and literature review. International law shows how the right to food is

¹¹ See U.N. Development Program (UNDP), "Human Development Index (HDI)," *website* (last visited 4 July 2025), available at <https://hdr.undp.org/data-center/human-development-index#/indicies/HDI> [https://perma.cc/9CBA-ZEP6].

¹² See *generally* McNall, M. and Foster-Fishman, P., "Methods of Rapid Evaluation, Assessment, and Appraisal," *Am. J. of Eval.*, Vol. 28, no. 2 (Jun. 2007), available at: <http://dx.doi.org/10.1177/1098214007300895> (describing the utility and methods of the Rapid Assessment approach).

not just about having enough calories to survive, and the right to housing is not just about having any sort of shelter from the elements. Each of these rights has several elements, called “pillars” in the commentary on international law, that define the scope of the right. As the legal research showed, the right to adequate food encompasses the four pillars of availability, accessibility, adequacy, and sustainability. The right to adequate housing also has a broader definition, which covers the seven pillars of legal security of tenure, affordability; habitability; availability of services, materials, facilities, and infrastructure; accessibility; location; and cultural adequacy.

While the ICESCR is not necessarily binding or enforceable in many cases, the way food and housing rights are conceptualized by the convention and its commentary using the above-mentioned components provides a useful theoretical underpinning for our analysis. Relevant federal, national, county, and city laws and regulations were reviewed for both Vienna and Chicago to examine attitudes towards housing and food for forced migrants. Comparisons between the relevant legal frameworks in Vienna and Chicago were also researched, as well as the gaps in the sets of law and policy where they were simply silent on matters concerning the studied rights. Law review and journal articles and commentary were reviewed as well to provide analytic gloss where possible, and to suggest alternate approaches.

c. Data Collection Process and Tools

Key Informant Interviews: The project conducted in-depth, qualitative Key Informant Interviews with representative stakeholders in Chicago and Vienna engaging with right to adequate food and right to adequate housing from March to June 2025. These KIIs were somewhat formal and semi-structured, including a pre-selected list of questions for interviewees but also allowing for free-flowing discussions. There was an emphasis on how the Key Informants interpreted relevant law and policy impacting the rights to adequate food and adequate housing and how those laws and policy worked in real life. The KIIs also considered issues of identity and discrimination, and looked at the impact of gender, nationality, ethnicity, religion, age, and disability, as well as the intersectional impact of these identities. Being new arrivals to their host countries, refugees and asylum seekers in both cities faced an assortment of challenges related to their identity.

Key Informants included NGO representatives, academics, government officials, and other relevant stakeholders, and the substantial majority were working in the refugee, food, or housing fields in Chicago and Vienna. KIIs were conducted by researchers in-person in Chicago and Vienna and remotely using Teams and Zoom applications when necessary. A list of the KII participants is attached as Annex A. *Output:* 36 Key Informants participated in 34 KIIs conducted.

Focus Group Discussions: FGDs were conducted with members of forcibly displaced communities of interest to the PRAXIS project in Chicago and Vienna over the course of April and May 2025. FGD participants were all self-identified refugees or asylum seekers. To reduce safeguarding concerns, the project did not include minor children in any FGDs. The two main sampling methods utilized were through convenience and snowball sampling within the specific communities of interest.¹³ Based on the sampling methods used, the demographics of the FGD participants may not reflect the actual composition of Afghan (or Iraqi/Syrian/Rohingya) refugees, particularly in terms of ethnic or sectarian backgrounds. Separate FGDs were conducted for men

¹³ See, e.g., Kassiani Nikolopoulou, “What Is Convenience Sampling? Definition & Examples,” *website* (9 Aug. 2022), available at <https://www.scribbr.com/methodology/convenience-sampling/>, and Kate Williams, “Snowball Sampling: Techniques, Applications, and Examples,” *website* (26 Sep. 2024), available at <https://surveysparrow.com/blog/snowball-sampling/> [<https://perma.cc/LM9L-FDJU>].

and women in both Chicago and Vienna. A list of the FGDs conducted with aggregated information on the participants is attached as Annex B.

FGDs were held primarily in Dari or Arabic and facilitated by trained native speakers in those languages. German and/or English were also used from time-to-time in various focus groups at the instigation of the FGD participants themselves. Rohingya FGD participants were a part of one women-only focus group in Chicago and all spoke English. *Output:* 8 FGDs conducted with 91 participants.

d. Data Analysis

Legal and Policy Analysis: Legal and policy analysis looked at how the law “on the books” compared to the law “in real life” as shown by the qualitative research done. This analysis utilized legal realism and law and society, which both recognize that law as applied is heavily impacted by social conditions not just the formal abstract rules and recognize the “fundamentally political nature of the law.”¹⁴

Qualitative Data Analysis: Inductive category development for the PRAXIS research was connected to the objectives of the project and based on the pillars of the right to adequate food and the right to adequate housing set forth in the General Comments to the ICESCR on those rights:

- Availability, Accessibility, Adequacy, and Sustainability for the right to adequate food; and
- Legal Security of Tenure; Affordability; Habitability; Availability of Services, Materials, Facilities, and Infrastructure; Accessibility; Location; and Cultural Adequacy for the right to adequate housing.

The following guiding questions were used in this regard when analyzing the coding data from the KIIs and FGDs:

- What are the key good practices (e.g. legal frameworks, approaches, service delivery, trainings, and other methods) can be seen in each of Chicago and Vienna, and are they suitable to being replicated elsewhere?
- What are the main three to five (3-5) challenges in Vienna and Chicago observed by the project?
- What recommendations can be made to protect and promote the right to adequate food and adequate housing for forced migrants in the future based on the findings of the research?
- What recommendations are there to build upon or scale up the successes observed?
- What specific priority actions would be most impactful to protect and promote the right to adequate food and adequate housing for forced migrants in the future?

As suggested earlier, the interplay of legal and qualitative research was used extensively to address these questions as well.

¹⁴ See, e.g., Cornell Law School Legal Information Institute, “Legal Realism,” *website* (Jun. 2023), available at https://www.law.cornell.edu/wex/legal_realism [<https://perma.cc/PVU5-DQAW>]; and Lynn Mather, “Law and Society,” *Ox. Handbook of Pol. Sci.* (5 Sep. 2013), at 289, available at <https://doi.org/10.1093/oxfordhb/9780199604456.013.0015>.

e. Limitations, Challenges, and Mitigation

Sensitive topics for FGD participants: Researchers anticipated that FGD participants might experience discomfort when discussing sensitive topics such as displacement and resource access. To mitigate this, all FGDs were conducted in safe environments, primarily on the premises of NGOs that work with refugees and asylum seekers, so locations of trust for participants.

Do-no-harm and personal safety: The do-no-harm imperative was considered at all stages of the research, especially considering the increasingly antagonistic approach of the federal governments in both Austria and the United States to the rights of forced migrants. The research was not designed to look at undocumented migrants and no questions asked about legal status in FGDs to avoid any unnecessary legal and criminal risks to FGD participants. Additionally, as part of the do-no-harm analysis conducted by the researchers, it was decided that only adults would be permitted to participate in the research.

It was hoped that the choice to focus on the rights to adequate food and adequate housing for forced migrants already present in the interior of Austria and the U.S. helped to mitigate the challenging political environment. These topics are less controversial or less visible compared to issues around criminality amongst migrants; immigration law enforcement; work and employment for migrants; or anything to do with border crossing by migrants.

f. Institutional Review Board (IRB) and Ethical Clearance

This research was completed with ethical clearance in Vienna and Chicago by the Institutional Review Board and the WU Ethics Board (*WU Beirat für Ethische Fragen*).

LEGAL AND POLICY CONTEXTS

In the US, federal law sets the floor of which immigrant categories have access to government-sponsored food and housing programs. [identify who is eligible for what]. States may provide greater benefits. In Illinois, the legislature has provided these categories who are eligible for SNAP, cash, housing. At the local/city level, there are nondiscrimination provisions (not specific to categories of migrants) and specific housing provisions.

As mentioned above, the focus of this research was on the examination of the rights to adequate food and housing as guided by international law for forcibly displaced persons outside of their countries of origin in the context of two specific localities: Chicago and Vienna. These forcibly displaced persons are primarily “refugees” and “asylum seekers” are defined by international law in Article 1 of the 1951 Refugee Convention and the 1967 Refugee Protocol, which states that:

To be recognized as a refugee, a person must show:

- A well-founded fear
 - of being persecuted
 - for reasons of race, religion, nationality, membership of a particular social group or political opinion;
- is outside the country of their nationality;

and

- is unable or, owing to such fear, is unwilling to avail themselves of the protection of that country.¹⁵

Both countries subject to this research generally accept this refugee definition as both Austria and the U.S. have ratified the international law definition found in the 1951 Refugee Convention and the 1967 Refugee Protocol,¹⁶ and both countries have domesticated the refugee definition in their national law. The U.S. codified the international definition of refugee almost verbatim as part of the 1980 Refugee Act.¹⁷ In Austria, the national law defines “asylum seekers” (*Asylberechtigten*) or “refugees” (*Flüchtlingen*) explicitly based on the 1951 Refugee Convention, and these definitions are set forth in the current version of the Asylum Act 2005 (*Asylgesetz 2005*).¹⁸

Unlike the international law approach to the human rights of housing and food, laws operating in Chicago and Vienna make distinctions based on legal immigration status. Notwithstanding the

¹⁵ See Convention Relating to the Status of Refugees, *supra* note 6, art. 1A(2), and Protocol Relating to the Status of Refugees, art. I(2), 31 Jan. 1967, 606 U.N.T.S., 267.

¹⁶ See UNHCR, “States Parties to the 1951 Convention and its 1967 Protocol,” *website* (17 Apr. 2015), available at <https://www.unhcr.org/us/media/states-parties-1951-convention-and-its-1967-protocol> (noting that Austria has ratified both the 1951 Convention and the 1967 Protocol, while the U.S. has only ratified the 1967 Protocol). Note that the refugee definition is identical in the 1951 Convention and the 1967 Protocol, so that even though the U.S. has only ratified the 1967 Protocol, it does not impact its acceptance of the international law definition of the term “refugee”.

¹⁷ See 8 U.S.C. § 1101(a)(42) (stating the refugee definition from the 1980 Refugee Act in current U.S. law).

¹⁸ See ASYLGESETZ 2005 [ASYLUM ACT 2005] BUNDESGESETZ [BG] BGBl I No. 100/2005, §§ 2(1)(14), 3, as last amended by BG BGBl I No. 67/2024, (last visited 16 Jul. 2025) available at <https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=20004240> [<https://perma.cc/EN62-XXCY>] (Austria).

general acceptance of the refugee and asylum seeker definitions set by international law, both the U.S. and Austria have established a number of legal statuses for forcibly displaced persons legally resident in their countries. The U.S. has a particularly large numbers of status categories and transition between categories is common. For instance, “refugee” is only used for people who have been resettled by the U.S. government after a vetting process outside of the country; whereas “asylee” is someone granted refugee status in the U.S. but not through resettlement. “Asylum seeker,” as previously noted, means the same thing in the U.S. as in international law: an applicant for refugee status.¹⁹ Austrian law does not have as many legal categories as does American law, but it does have subsidiary protected status as well as refugee status.

To avoid confusion and to not get bogged down in highly technical areas of the law not directly relevant to the research conducted, all forcibly displaced people targeted in this research are referred to solely as “asylum seekers” and/or “refugees”. This is even if they may have a different technical legal status in their host country.²⁰ One reason that Afghans, Iraqis, Rohingya, and Syrians were targeted in this research is because the countries of origin of these forced migrants are geographically distant from both Austria and the U.S. and there are not sizable numbers of undocumented migrants in either country of any of these nationalities.²¹

¹⁹ American immigration and asylum law is complex, and the referenced paragraph is a very simplistic summary that is only intended to provide some context about the groups targeted by the PRAXIS research. The resources cited in this footnote provide additional detail as well as sources for further reading, but should not be considered comprehensive. See American Immigration Council, “An Overview of U.S. Refugee Law and Policy,” *fact sheet* (24 Apr. 2025), available at <https://www.americanimmigrationcouncil.org/fact-sheet/overview-us-refugee-law-and-policy/> [https://perma.cc/AXT7-LYS2]; Diana Roy and Claire Klobucista, “What Is Temporary Protected Status?,” *Council on Foreign Relations backgrounder* (2 Jul. 2025), available at <https://www.cfr.org/backgrounder/what-temporary-protected-status> [https://perma.cc/5P3D-MTZ7]; State Justice Institute, “Overview of Types of Immigration Status,” *bench card for judges* (1 Apr. 2013), available at <https://www.sji.gov/wp/wp-content/uploads/Immigration-Status-4-1-13.pdf> [https://perma.cc/68Y9-8ZLK]; and UNHCR, “Types of Asylum,” *website* (last visited 4 Jul. 2025), available at <https://help.unhcr.org/usa/applying-for-asylum/types-of-asylum/> [https://perma.cc/4W8W-4VD9].

²⁰ The mechanics of presenting asylum claims and the refugee determination process in the U.S. and Austria also were not investigated as part of the PRAXIS research. This operation of these systems is generally beyond the scope of the research question as set forth in Section 3(b) of this report, which considers the rights to adequate food and adequate housing in Chicago and Vienna for people who are presumed to be legally resident in those cities.

For details on the asylum process in both countries, please see U.S. Citizenship and Immigration Services, “Obtaining Asylum in the United States,” *website* (13 Sep. 2023), available at <https://www.uscis.gov/humanitarian/refugees-and-asylum/asylum/obtaining-asylum-in-the-united-states> [https://perma.cc/M7CL-BP6N] (U.S.); see Federal Chancellery, “Asylum procedure,” *website* (30 Apr. 2024), available at https://www.oesterreich.gv.at/en/themen/menschen_aus_anderen_staaten/asyl-in-oesterreich/Seite.3210002.html [https://perma.cc/798H-AZQV] (Austria); see also *asylkoordination österreich*, “Overview of the Legal Framework: Austria,” *Asylum Information Database website* (10 Jul. 2024), available at <https://asylumineurope.org/reports/country/austria/overview-legal-framework/> [https://perma.cc/55P3-NMKQ] (providing a very useful overview of the statutory basis of Austrian asylum law can be found on the Asylum Information Database).

²¹ Especially in the U.S., obtaining protected status can be a time-consuming and fraught process for migrants with significant risks of detention and deportation. However, the vast majority of Afghans, Iraqis, Rohingya, and Syrians resident in Austria and the U.S. have obtained one type of protected status or another; for example, Afghans and Iraqis receiving Special Immigrant Visas (SIV) and Syrians having TPS in the U.S. See, e.g., European Council on Refugees and Exiles (ECRE), “Seeking Protection: Afghan

a. International Law

The international law around the right to adequate food and the right to adequate housing is established by Article 11(1) of the ICESCR. The relevant portion of the ICESCR reads:

“The States Parties ... recognize the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions.

“The States Parties will take appropriate steps to ensure the realization of this right, recognizing to this effect the essential importance of international cooperation based on free consent.”

As can be seen from the text above,²² although the rights to adequate food and housing are obligatory for State Parties, what those rights mean are not explained in the ICESCR itself. However, official commentaries provide normative guidance as to the meaning of the right to adequate food and the right to adequate housing.

Before explaining how the right to adequate housing and the right to adequate food are currently understood, the conceptual distinction between the two different types of rights – positive and negative – will be discussed. Food and housing rights sit within the concept of “positive rights” as opposed to the “negative rights” that are more familiar to many in the Global North.

i. Negative and Positive Rights

For many people in the most developed countries, human rights are solely civil and political rights. These are the classic “negative rights,” and realizing “these rights implies primarily the negative obligations of not interfering in the lives of individuals.”²³ These are rights that comprise “freedom from” some sort of government action. Examples of “negative rights” include Freedom from Torture and Cruel Punishment; Freedoms of Speech, Religion, and Assembly; and the Right to a Fair Trial. These are the sorts of human rights enshrined in the U.S. Bill of Rights.²⁴ Negative rights are, therefore, seen as having “no costs involved,” being justiciable, and having immediate applicability, because they rely primarily on State non-interference.²⁵ The core international law instrument that lays out “negative rights” is the International Covenant on Civil and Political Rights (ICCPR).²⁶ Both the U.S. and Austria are State parties to the ICCPR.²⁷

Asylum Applicants in the EU,” Policy Note no. 45, at 2, (2024), available at https://ecre.org/wp-content/uploads/2024/03/ECRE-Policy-Note-45_Seeking-Protection_Afghan-Asylum-Applicants-in-the-EU.pdf [<https://perma.cc/UKM3-RLHW>] (stating that 93% of Afghans receive refugee status in Austria), and Ismail Shakil and Kanishka Singh, “US appeals court temporarily upholds protected status for Afghans,” Reuters (14 Jul. 2025), available at <https://www.reuters.com/legal/government/us-appeals-court-temporarily-stays-termination-afghans-protected-status-2025-07-15/> (describing the types of protected status received by Afghans in the U.S.).

²² International Covenant on Economic, Social, and Cultural Rights, art. 11(1), 16 Dec. 1966, 993 U.N.T.S. 3 (ICESCR).

²³ Food and Agriculture Organization (FAO), “A Primer to the Right to Adequate Food: Human Rights Based Approach to Development,” (2007), at 19.

²⁴ See US CONST., amend. 1-10, *passim*.

²⁵ FAO Primer, *supra* note 23, at 20.

²⁶ See *generally* ICCPR, *supra* note 22 (requiring signatory states to respect “negative rights”).

²⁷ See U.N. Office of the High Commission for Human Rights (OHCHR), “View the ratification status by country or by treaty,” *UN Treaty Body Database website* (last visited 21 Apr. 2025), available at https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?Treaty=CCPR&Lang=en

Conversely, economic, social, and cultural rights are called “positive rights,” as realizing these rights calls for government action and, therefore, entail positive obligations. Examples of “positive rights” include the Rights to Education, Employment, and Cultural Participation; Right to Protection against Unemployment; and the Right to an Old Age Pension, such as Social Security. The Right to Adequate Food and Right to Adequate Housing are “positive rights” as well.²⁸ Positive rights, especially during the Cold War era, were historically seen as “socialistic” since they required state intervention and many saw them as expensive, non-justiciable, time-consuming, and with violations or progress hard to measure.²⁹ As with civil and political rights, economic, social, and cultural rights have a leading international instrument, the ICESCR. While Austria has ratified the ICESCR, and it was signed by the U.S. in 1977, it was never ratified by the U.S.³⁰

“Positive rights” are often not perceived as human rights in the U.S., but instead as entitlements: things that are nice for the government to provide, but are not required.³¹ However, in the past, the U.S. federal government has recognized “positive rights” as human rights, if often only obliquely. This can be seen most prominently in the U.S. Government’s last three National Reports submitted as part of the U.N.’s Universal Periodic Review (UPR) process. For instance, in the 2010 UPR National Report, the U.S. included a section on housing in its discussion of the government’s “commitment to foster a society where citizens are empowered to exercise their rights.”³² As can be seen in this framing, housing was not necessarily conceived of as a right but rather as an enabling factor permitting the exercise of rights. The U.S. UPR National Reports in 2015 and 2020 also discussed housing. In 2015, it focused on government programs seeking to reduce homelessness,³³ while the 2020 report goes further to have a full section explicitly on “[e]conomic, social and cultural rights and measures.”³⁴ The 2020 National Report also focused on combatting homelessness when discussing the steps taken by the U.S. government in the

[<https://perma.cc/8LTA-J6CH>].

²⁸ See ICESCR, *supra* note 22, art. 11(1).

²⁹ FAO Primer, *supra* note 23, at 20.

³⁰ See OHCHR Treaty Body Database, *supra* note 27. One Key Informant academic interviewed as part of the qualitative research suggested that the research should consider the impact of the International Covenant on the Elimination of All Forms of Racial Discrimination (CERD) on the right to adequate housing and the right to adequate food for refugees and migrants as their differential treatment may be based on racial discrimination, and both the U.S. and Austria have ratified CERD. See *generally* CERD, 21 Dec. 1965, 660 U.N.T.S. 195. Due to time constraints and the legal complexity of this argument, the researchers have not analyzed CERD as it relates to the PRAXIS research question, although it would be ripe for future inquiry.

³¹ See *generally* Scott Busby, “Whither the United States on Economic, Social, and Cultural Rights?,” CENTER FOR STRATEGIC & INT’L STUDIES (CSIS) BRIEF (Oct. 2024) (explaining the historic approach of the American government to economic, social, and cultural rights in international fora).

³² A/HRC/WG.6/9/USA/1, National report submitted in accordance with paragraph 15 (a) of the annex to Human Rights Council resolution 5/1: United States of America (23 Aug. 2010), at 15; see *id.*, at 16-17 (section on housing).

³³ See A/HRC/WG.6/22/USA/1, National report submitted in accordance with paragraph 5 of the annex to Human Rights Council resolution 16/21: United States of America (13 Feb. 2015), at 20.

³⁴ A/HRC/WG.6/36/USA/1, National report submitted in accordance with paragraph 5 of the annex to Human Rights Council resolution 16/21: United States of America (13 Aug. 2020), at 12.

housing area.³⁵ Although housing rights are mentioned in the National Reports from 2010-20 to some degree, the right to adequate food is not mentioned in any of the three reports.

ii. *Right to Adequate Food*

There are two main U.N.-promulgated commentaries to the right to adequate food as laid out in Article 11(1) of the ICESCR, which provide persuasive guidance as to the scope and implementation of that right: U.N. Food and Agricultural Organization's (FAO) Voluntary Guidelines for the Right to Adequate Food (Voluntary Guidelines) and the General Comment no. 12 of the U.N. Committee on Economic, Social and Cultural Rights (CESCR) (GC 12).³⁶ Both of these commentaries are non-binding, but they both provide relative extensive and concrete guidance about what the right to adequate food means in practice. GC 12 speaks in more abstract ways about general principles of the right to adequate food, and the Voluntary Guidelines are directed more to governmental duty-bearers and other professional stakeholders to encourage more specific types of legislative or policy interventions to promote the right to adequate food.

Notwithstanding their target audiences, both the commentaries include how to understand the right to adequate food as part of the concept of food security – having enough to eat – but also go beyond a narrow definition of the right to enunciate four pillars to the right to adequate food: Availability, Accessibility, Adequacy, and Sustainability.³⁷ GC 12 makes plain the comprehensiveness of the right to adequate food: “The right to adequate food is realized when every man, woman and child, alone or in community with others, have physical and economic access at all times to adequate food or means for its procurement. The right to adequate food shall therefore not be interpreted in a narrow or restrictive sense which equates it with a minimum package of calories, proteins and other specific nutrients.”³⁸

The Voluntary Guidelines explain the four pillars of the right to adequate food. Availability of food is defined as availability “in quantity and quality sufficient to satisfy the dietary needs of individuals.”³⁹ Availability covers not just the means of food procurement but also raising crops and livestock; fishing; and other types of harvesting.⁴⁰ But availability must be accompanied by “physical and economic accessibility for everyone, including vulnerable groups,” and “adequate food free from unsafe substances and acceptable within a given culture.”⁴¹ Much of the need for food adequacy is about the need for nutrition, including promoting healthy eating habits, feeding patterns, and food preparation.⁴² Sustainability has its own guideline that calls on governments “to protect ecological sustainability and the carrying capacity of ecosystems to ensure the possibility for increased, sustainable food production for present and future generations, prevent

³⁵ See *id.*

³⁶ See FAO, *Voluntary Guidelines to Support the Progressive Realization of the Right to Adequate Food in the Context of National Food Security – Adopted by the 127th session of the FAO Council, 22-27 November 2004*, (Nov. 2004), available at <https://doi.org/10.4060/y7937e>; and E/C.12/1999/5, Committee on Economic, Social and Cultural Rights, Substantive Issues Arising in the Implementation of the International Covenant on Economic, Social and Cultural Rights: General Comment 12 (Twentieth session, 1999), The right to adequate food (art. 11) (12 May 1999).

³⁷ See *id.*, GC 12, at nos. 7-8.

³⁸ *Id.*, GC 12, at no. 6.

³⁹ Voluntary Guidelines, *supra* note 36, at 3 (Preface, para. 16).

⁴⁰ See GC 12, *supra* note 36, at no. 12.

⁴¹ Voluntary Guidelines, *supra* note 36, at 3 (Preface, para. 16).

⁴² See *id.*, at 17 (Guideline 10, § 10.1).

water pollution, protect the fertility of the soil, and promote the sustainable management of fisheries and forestry.”⁴³

iii. *Right to Adequate Housing*

The CESCR’s commentary of the right to adequate housing is the primary interpretative guidance from a mandated U.N. entity for that right in the absence of a document like the Voluntary Guidelines for housing rights. General Comment no. 4 (GC 4) states that the “right to housing should not be interpreted in a narrow or restrictive sense which equates it with, for example, the shelter provided by merely having a roof over one’s head or views shelter exclusively as a commodity.”⁴⁴ Seven key pillars for the right to adequate housing are described in GC 4: Legal Security of Tenure; Affordability; Habitability; Availability of Services, Materials, Facilities, and Infrastructure; Accessibility; Location; and Cultural Adequacy.⁴⁵

These seven pillars are explained in GC 4 with some particularity, each receiving its own subsection with detail provided. For example, the degree of security of tenure – whether it be rental, emergency shelter, or ownership, among others – must guarantee legal protection against forced eviction, harassment and other threats.⁴⁶ Affordability in housing costs is context-specific and needed so that other basic needs are not threatened, whereas habitability means housing that is spacious and safe enough to live in and be protected from structural hazards and disease vectors (like mold or lead paint).⁴⁷ The availability of services requirement includes certain utilities essential for health, security, comfort, and nutrition – such as cooking, washing, clean water, lighting, and heating.⁴⁸ Accessibility means is there adequate housing that can be obtained, while housing location is concerned with allowing access to employment options, health care services, schools, childcare, and other social facilities.⁴⁹ Finally, GC 4 says that housing needs to enable the expression of cultural identity, including by providing for a diversity of housing options that respects the cultural dimension of housing.⁵⁰

The U.N. Human Settlement Program (UN-Habitat) has promulgated, in cooperation with the U.N. Office of the High Commissioner for Human Rights (OHCHR), a helpful fact sheet on the right to adequate housing that supplies a significant amount of detail regarding the scope and applicability of the housing right.⁵¹ In particular, there is a clear discussion of the seven pillars of the right to adequate housing described above, which says that those elements are needed as “[a]dequate housing must provide more than four walls and a roof.”⁵² Although the fact sheet is more of an explanatory publication than an official guidance for governments, its forthrightness makes it a helpful interpretive tool as it is from two authoritative U.N. agencies.

⁴³ *Id.*, at 15 (Guideline 8e, § 8.13).

⁴⁴ E/1992/23, Committee on Economic, Social and Cultural Rights, Substantive Issues Arising in the Implementation of the International Covenant on Economic, Social and Cultural Rights: General Comment 4 (Sixth session, 1991), The right to adequate housing (art. 11(1) of the Covenant), at no. 7 (1991).

⁴⁵ See generally *id.*, at no. 8 (setting forth the seven pillars of the right to adequate housing).

⁴⁶ See *id.*, at no. 8(a).

⁴⁷ See *id.*, at nos. 8(c)-(d).

⁴⁸ See *id.*, at no. 8(b).

⁴⁹ See *id.*, at nos. 8(e)-(f).

⁵⁰ See *id.*, at no. 8(g).

⁵¹ See U.N. Human Settlement Program (UN-Habitat) and OHCHR, Fact Sheet No. 21/Rev.1, *The Right to Adequate Housing* (May 2014).

⁵² *Id.*, at 3.

b. Law of the United States

American law and policy around housing and food for refugees and asylum seekers is structured with divided responsibilities based on the U.S. federal system. Broadly speaking, the U.S. federal government sets the general guidelines and provides most of the funding for food and housing assistance for refugees and asylum seekers, along with the rules for the rest of the population as well. But states, sometimes through municipalities, implement the programming and deliver the support.

Different states make different rules on top of the ones set by the federal government, and Illinois is no exception to this general practice. For the most part, the Illinois Department of Human Services (IDHS) implements the food and housing assistance programs authorized by the U.S. federal law and overseen nationally by the U.S. Department of Housing and Urban Affairs (HUD) and the U.S. Department of Agriculture (USDA) for housing and food assistance, respectively. Other instrumentalities of the State of Illinois as well as the City of Chicago and Cook County have several additional support programs for food and housing assistance in addition to what is set forth by the federal government, and those will be investigated below as well. As well, Illinois's and Chicago's specific policy is to welcome refugees and asylum seekers, which ensures that refugees and asylum seekers are eligible for most forms of food and housing assistance in Chicago.

i. *U.S. Federal Law*

In the U.S., food and housing assistance for refugees and asylum seekers is based on the law and policy decisions of the U.S. federal government. Additionally, the national government also provides a significant majority of the monetary funding for these assistance programs, which is conditioned on the states receiving the funds complying with the federal statutory and administrative requirements. Federal executive branch agencies, such as HUD and USDA, monitor state compliance, as well as collecting data on the usage of the federally-funded programs to support refugees and asylum seekers. Additionally, resettled refugees are provided with support by the U.S. Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR) and the U.S. Department of State Bureau of Population, Refugees, and Migration (PRM), which is in addition to the forms of federal assistance described below.⁵³ While PRM does provide an initial grant that is applied to housing for resettled refugees, none of the additional services provided by HHS ORR relate to food or housing, however. Additionally, all of this federal support to refugees is a risk due to the policies of the current presidential administration, which is also discussed where relevant below.

While the legal framework for this network of federally-supported programming had not been meaningfully modified since the start of the new presidential administration in January 2025 at the time of the data collection for the PRaXIS project, the ability and desire of the federal government to implement these programs had already been reduced.

⁵³ See U.S. Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR), "Fact Sheet: Eligibility for ORR Benefits and Services – Asylees," (und.) (last visited 21 Apr. 2025), available at https://acf.gov/sites/default/files/documents/orr/orr_fact_sheet_asylee.pdf [<https://perma.cc/SR3W-DEYS>]; and U.S. Department of State, "Domestic Refugee Resettlement—the Reception and Placement Program and Welcome Corps," (20 Jan. 2025), available at <https://2021-2025.state.gov/refugee-admissions/domestic-resettlement/> [<https://perma.cc/7F2Z-WRD9>]; see also HHS ORR, "About the Program," website (22 Oct. 2024), available at <https://acf.gov/orr/about-refugee-program> [<https://perma.cc/747M-XC72>] (describing the types of support provided by ORR for qualifying resettled refugees).

This can be seen most clearly in the substantial, unprecedented staff reductions in the federal agencies legally-charged with implementing these congressionally-mandated programs.⁵⁴ For this reason, and although the binding law discussed below is still on the books, it remains an open question how the ongoing staff reductions and the commitment to undermining these programs by the current administration will impact food and housing assistance in the U.S. for refugees and asylum seekers. It is worthwhile, however, to see what is required with by existing law as a way to understand the impact of executive branch non-compliance, and also to recognize what the federal government should be providing.

Subsequently, with the passage of budget legislation in July 2025, they have been both monetary cuts to governmental support programs and eligibility requirements have been significantly tightened, which is expected to substantially reduce refugees and asylum seekers access to benefits. As these changes occurred during the writing of this Final Report, a specific analysis of the impact of the new law has not been made. Where the changes in governmental support to refugees and asylum seekers are clear, it has been noted in the Findings in Section 6 below.

Food Assistance

The core food assistance program of the U.S. federal government is the Supplemental Nutrition Assistance Program (SNAP).⁵⁵ Primarily, SNAP provides cash-equivalent credits to individuals so that they can buy food. This was done historically through the issuance of paper coupons, but it is now handled by transferring funds to a plastic card that acts like a credit card for the purchase of food items from participating retailers.⁵⁶ The funding for SNAP is provided by the federal government to each state, which implements the program differently, so long as the state implementation complies with the provisions of the SNAP law.⁵⁷ States have a great deal of leeway in the specific modalities of implementation within the general confines of the SNAP law.⁵⁸

Generally speaking, refugees qualify for SNAP benefits, but asylum seekers do not.⁵⁹ However, each implementing state makes the eligibility determination, and Illinois is more liberal in finding SNAP eligibility than some other states, which will be discussed further in the Illinois food assistance section below.

The second most prevalent food assistance program in the U.S. is the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), which is also connected to free and

⁵⁴ See, e.g., Ben Metcalf, “Implications of Further HUD Staffing Cuts on the Housing Sector,” *Terner Center for Housing Innovation, Univ. of California Berkeley website* (13 Mar. 2025), available at <https://ternercenter.berkeley.edu/blog/implications-of-further-hud-staffing-cuts-on-the-housing-sector/> [https://perma.cc/PF92-8DTJ] (detailing the impact of staffing reductions at HUD on federal housing assistance programming); and Liz Neisloss, “Job cuts at USDA in Boston could weaken New England food security,” *WGBH* (26 Feb. 2025), available at <https://www.wgbh.org/news/national/2025-02-26/job-cuts-at-usda-in-boston-could-weaken-new-england-food-security> [https://perma.cc/TQ5R-2XA9] (discussing how job cuts at USDA impacts the implementation of food assistance programming).

⁵⁵ See 7 U.S.C. §§ 2011-2036d (2023).

⁵⁶ See *id.*, § 2016(f)(3).

⁵⁷ See *id.*, § 2016(b) (describing the use of SNAP benefits).

⁵⁸ See, e.g., *id.*, § 2016(h)(1)(C) (permitting states flexibility in how they design and implement electronic benefit transfer systems).

⁵⁹ See U.S. Department of Agriculture (USDA), “SNAP Eligibility for Non-Citizens,” *website* (18 Mar. 2025), available at <https://www.fns.usda.gov/snap/recipient/eligibility/non-citizen> [https://perma.cc/MB7V-C338].

reduced-priced school breakfast and lunch programs in terms of oversight.⁶⁰ WIC provides additional food assistance, through both cash and food distribution, to families with children up to the age of five.⁶¹ Also supported under the auspices of WIC is nutrition education for parents and family members when the family has an under-5-year-old, as well as an array of obesity reduction and diet improvement measures.⁶² WIC, as with SNAP, is conditioned on someone being “low-income,” which has been defined as not more than 185 percent of the federal poverty income guidelines.⁶³

Unlike SNAP, there are no immigration-related restrictions on WIC eligibility. This means that both refugees and asylum seekers qualify for WIC, so long as they have a child under five in their family and are beneath maximum income requirements.⁶⁴

An additional federal food assistance program applicable to both refugees and asylum seekers is the Commodity Supplemental Food Program (CSFP).⁶⁵ The main emphasis for CSFP is the provision of certain types of food, which is designed to supplement individuals’ diets to improve their health and nutrition. CSFP has age – over 60 years old – and income eligibility requirements – similar although slightly lower than the ones for SNAP and WIC at 150 percent of the poverty guidelines – but it does not generally have migration status or residence requirements.⁶⁶

SNAP, WIC, and CSFP are three of the most relevant food assistance programs from the federal government for refugees and/or asylum seekers, but they are not the only ones. There are a variety of federal programs having to do with food and nutrition with a variety of specific aims and eligibility requirements, especially for Native Americans and older adults.⁶⁷ It can be difficult to assess whether someone qualifies for different programs, especially for people with limited English language skills or unfamiliarity with U.S. government programs.

Housing Assistance

Low-income housing assistance is provided by the U.S. federal government, again through the modality of state program administration. This housing assistance is often called “Section 8” housing support, or sometimes the Housing Choice Voucher program.⁶⁸ Section 8, which was named for being authorized by Section 8 of the Housing Act of 1937, provides a subsidy to

⁶⁰ See Child Nutrition Act of 1966, 42 U.S.C. §§ 1771-1793; *see also* 7 C.F.R. Part 246 (2025) (setting forward the regulations governing the Special Supplemental Nutrition Program for Women, Infants and Children (WIC)).

⁶¹ See *id.*, § 1786(b)(2) and § 1786(c)(1).

⁶² See Healthy, Hunger-Free Kids Act of 2010, 42 U.S.C. §§ 1751-1769j (2010).

⁶³ See 42 U.S.C. § 1786(d)(1); *see also* USDA, “WIC Eligibility Requirements,” *website* (28 Mar. 2025), available at <https://www.fns.usda.gov/wic/applicant-participant/eligibility> [<https://perma.cc/Y6MD-BGTE>].

⁶⁴ See We Got You Illinois, “Immigrant Households,” *website* (last visited 21 Apr. 2025), available at <https://wegotyouillinois.org/immigrant-households/> [<https://perma.cc/7ESE-G4KJ>].

⁶⁵ See 7 U.S.C. § 612c and 7 C.F.R. Part 247 (2025).

⁶⁶ See USDA, “CSFP Factsheet,” *website* (30 Oct. 2024), available at <https://www.fns.usda.gov/csfp/factsheet> [<https://perma.cc/979G-RHLD>].

⁶⁷ See, e.g., USAGov, “Food assistance,” *website* (last visited 21 Apr. 2025), available at <https://www.usa.gov/food-help> [<https://perma.cc/P7CG-6AUW>].

⁶⁸ See *generally* 24 C.F.R. Part 982 (2025) (describing the rules for the Section 8 Tenant-Based Assistance, or Housing Choice Voucher, Program); *see also* 42 U.S.C. §§ 3531-3550 (containing the statutory authority for Section 8 support); and U.S. Department of Housing and Urban Affairs (HUD), “HCV Applicant and Tenant Resources,” *website* (last visited 21 Apr. 2025), available at <https://www.hud.gov/helping-americans/housing-choice-vouchers-tenants> [<https://perma.cc/EAD8-2BMH>].

participating landlords who rent to qualifying individuals so that these people can afford to rent a unit in the local housing market.⁶⁹ Qualifying renters find their own rental unit on the private market, and then the landlord enters into a separate contract with the local public housing agency at the same time a lease is signed with the renter, and that additional contract ensure that the landlord receives a subsidy from the government.⁷⁰

In addition to Section 8 rental support, there are a variety of other types of housing assistance funded by the federal government but implemented by the states. This includes other kinds of project-based forms of rental assistance, such as HUD multi-family mortgage programs, as well as programs for elderly or disabled persons and rural housing support funded by the USDA.⁷¹ Most of these other forms of federally-subsidized housing support will not be directly relevant to refugees and asylum seekers, but they may be able to utilize them in some cases.

Section 8 housing support is the most common one utilized by refugees, although it is not accessible for asylum seekers due to the provisions of Section 214 of the Housing Act. The language found in Section 214 is used to determine whether non-citizens in the U.S. can receive housing benefits.⁷² This section broadly prohibits non-citizens from receiving federal housing assistance; it also exempts certain enumerated categories of non-citizens from this restriction. One of those enumerated non-citizen categories that can receive housing benefits is a recognized refugee. The relevant subsection says that individuals are exempted from non-citizen exclusion from housing support “pursuant to the granting of asylum”.⁷³ The exclusion provisions of Section 214 generally keeps asylum seekers who have not yet received refugee status from receiving housing assistance, unless they fall into one of the other categories set forth in Section 214, like being a permanent lawful resident.⁷⁴

Based on the provisions of Section 214, refugees can qualify (and asylum seekers do not qualify) for public housing. HUD provides federal funding to public housing, which is government-owned rental units available for low-income people, among others. Public housing is managed by local public housing agencies and owned by local governments. If refugees meet income limits, which are set locally based on HUD guidelines, they can be eligible for public housing.⁷⁵

The use of the so-called “public charge” test has been used in recent years to chill refugees from using housing and other benefits to which they are entitled.⁷⁶ The “public charge” test is part of assessing an application for permanent residence, a “Green Card”, or U.S. citizenship, and it asks if a person “is likely to depend on government benefits as their main source of support” should

⁶⁹ See Housing Act of 1937, 42 U.S.C. § 1437f(c)(1)(A).

⁷⁰ See *id.*, at § 1437f(o).

⁷¹ See National Housing Law Project, “Resource Center,” *website* (last visited 21 Apr. 2025), available at <https://www.nhlp.org/resource-center/> [<https://perma.cc/KV7E-KQ5G>].

⁷² See Housing and Community Development Act of 1980, 42 U.S.C. § 1436a (2018).

⁷³ *Id.*, at § 1436a(a)(3).

⁷⁴ See Leslye Orloff, “Annotated Section 214 of the Housing Act: 42 U.S. Code § 1436a – Restriction on Use of Public and Assisted Housing by Immigrants,” NATIONAL IMMIGRANT WOMEN’S ADVOCACY PROJECT (NIWAP) LIBRARY (31 Oct. 2021), available at <https://niwaplibrary.wcl.american.edu/wp-content/uploads/Annotated-Section-214-of-the-Housing-Act-10.31.21.pdf> [<https://perma.cc/B5GJ-THN9>].

⁷⁵ See Housing Act of 1937, 42 U.S.C. § 1437 *et seq.*; see also HUD, “HUD’s Public Housing Program,” *website* (last visited 21 Apr. 2025), available at <https://www.hud.gov/helping-americans/public-housing> [<https://perma.cc/JB4T-639Z>] (setting forth the broad guidelines for public housing nationally).

⁷⁶ See Immigration and Nationality Act (INA), 8 U.S.C. § 1182(a)(4) (also known as INA, § 212(a)(4)).

they be given permanent status in the U.S.⁷⁷ The last three presidential administrations have gone back-and-forth whether the use of housing benefits like Section 8 can be used in a “public charge” determination against applicants for permanent residence or citizenship. If the use of housing assistance can be counted against refugees if they subsequently apply for permanent residence or citizenship, this could have a deterrent effect and potentially keep them from using this housing support as they may fear it being used against them if they should apply for permanent status later.⁷⁸

ii. *Illinois Law*

While the majority of the money for food and housing assistance that is used by refugees and, to some extent, asylum seekers in Chicago comes from the U.S. federal government, it is both administered and sometimes supplemented by the State of Illinois. Illinois has passed laws to effectuate the administration of federal funds received for food and housing programs, which are contained in the Illinois Public Aid Code.⁷⁹ Generally, food and housing assistance in the state is overseen by the Illinois Department of Human Services (IDHS).⁸⁰ The Illinois state government has taken welcoming stance towards refugees and asylum seekers that facilitates them accessing support, as will be discussed, but first the mechanics of food and housing assistance in Illinois.

Food Assistance

As mentioned, Illinois administers most federally-funded food assistance programming, including SNAP, WIC, and CSFP.⁸¹ The administration is handled by IDHS pursuant to the Illinois Public Aid Code, which sets forth the eligibility for food assistance programs in Illinois, as well as how IDHS should coordinate with the federal government and administer the food assistance programs. IDHS has a Bureau of Family Nutrition (BFN), which administers WIC and CSFP, among other programs, and also provides nutrition promotion services as part of WIC programming.⁸²

As an example of the operation of the Illinois Public Aid Code, that code sets the gross income eligibility standard for SNAP recipients, stating that a household is eligible for SNAP “benefits if the gross income of such household is at or below 165% of those nonfarm income poverty

⁷⁷ Kayla Laywell, “Housing Access for Immigrant Households,” NATIONAL LOW INCOME HOUSING COALITION 2024 ADVOCATES’ GUIDE (last visited 21 Apr. 2025), at 6-66, available at https://nlihc.org/sites/default/files/AG-2024/6-12_Housing-Access-for-Immigrant-Households.pdf [<https://perma.cc/Q32P-GVV2>].

⁷⁸ See *id.*; see also Catholic Legal Immigration Network, “The Public Charge Final Rule: FAQs for Immigration Practitioners,” FAQ website (30 Jan. 2020), available at <https://www.cliniclegal.org/resources/ground-inadmissibility-and-deportability/public-charge/public-charge-final-rule-faqs> [<https://perma.cc/24VJ-BA7R>] (providing a detailed explainer on regulatory changes to the “public charge” test in recent years).

⁷⁹ See Illinois Public Aid Code 305 ILCS 5/1-1 *et seq.* (West 2024).

⁸⁰ See Department of Human Services Act 20 ILCS 1305/1-5 (West 2024); see also *id.* § 12-4 (vesting authority for assistance programming in IDHS).

⁸¹ See, e.g., Ill. Pub. Aid Code 305 ILCS 5/12.4-4 (West 2024) (regarding SNAP); and Illinois Department of Human Services (IDHS), “Commodity Supplemental Food Program,” website (last visited 21 Apr. 2025), available at <https://www.dhs.state.il.us/page.aspx?item=31874> [<https://perma.cc/YNY4-72RL>]; see generally *We Got You Illinois*, *supra* note 64 (setting out the variety of federally-funded food assistance available in Illinois and administered by the state government).

⁸² See IDHS, “Family Nutrition,” website (last visited 21 Apr. 2025), available at <https://www.dhs.state.il.us/page.aspx?item=32010> [<https://perma.cc/7QZU-XCYG>].

guidelines.”⁸³ There are also detailed regulations to govern the implementation of food assistance programs in Illinois, particularly for SNAP.⁸⁴ There is also a significant statutory and administrative scheme for WIC program implementation in Illinois along the same lines, particularly for the management of WIC vendors, like supermarkets.⁸⁵

The Illinois Public Aid Code also creates additional food assistance programs with state funding. One such program is the Healthy Local Food Incentives Program,⁸⁶ which further subsidizes SNAP purchases of fruits and vegetables at farmers markets on a dollar-for-dollar basis,⁸⁷ reducing the cost to purchase these healthy foods by 50 percent. Other examples are the summer and afterschool snack and meal programs that are conducted in Illinois, primarily in low income neighborhoods, in which food is served for free in locations like schools, parks, community centers and the like. Unlike for SNAP benefits, no identification or proof of immigration status is required to get a free meal or snack as part of these programs.⁸⁸

Housing in Illinois

The State of Illinois expressly protects refugees and asylum seekers from some kinds of discrimination in housing as part of the Immigrant Tenant Protection Act.⁸⁹ While this act prohibits landlords from threatening to report refugees and asylum seekers to law enforcement agencies based on their immigration or citizenship status or to evict a migrant tenant due to their immigration or citizenship status, it prefaces these mild protections with a litany of landlord conduct that is not prohibited by the act.⁹⁰ For instance, landlords may still refuse to rent to refugees if they do not have sufficient “financial qualifications,” although the scope of these sorts of qualifications are not defined in the act.⁹¹ As will be discussed in the Findings sections to follow, refugees and asylum seekers as a group tend not to have conventional “financial qualifications” such as a good credit score; demonstrable employment or employment history in the U.S.; American professional or academic credentials; or significant savings. This is usually due to the recent arrival of refugees and asylum seekers to the U.S. and not because of any inherent lack of creditworthiness. Nonetheless, landlords can legally refuse to rent to refugees based on these types of “financial qualifications” in ways that can be pretextual and de facto discriminatory.

Illinois has created public housing authorities and has provided the legal framework for them to implement the U.S. federally-funded Section 8 and public housing programs, among others.⁹²

⁸³ Ill. Pub. Aid Code 305 ILCS 5/12-4.13a. (West 2024).

⁸⁴ See 89 Illinois Administrative Code 121.1, *et seq.* (2017).

⁸⁵ See WIC Vendor Management Act 410 ILCS 255/1 *et seq.* (West 2024). See generally IDHS, “Section I. Introduction to WIC and WIC Services,” *website* (last visited 21 Apr. 2025), available at <https://www.dhs.state.il.us/page.aspx?item=165028> [<https://perma.cc/LP63-7YFN>] (describing the operation of WIC in Illinois).

⁸⁶ See Ill. Pub. Aid Code 305 ILCS 5/12-4.50 (West 2024).

⁸⁷ See *id.*, § 12-4.50(d).

⁸⁸ See We Got You Illinois, “Afterschool Snack and Supper Program,” *website* (last visited 21 Apr. 2025), available at <https://wegotyouillinois.org/afterschool/> [<https://perma.cc/4UU2-9VTD>]; and We Got You Illinois, “Summer Food Service Program,” *website* (2025), available at <https://wegotyouillinois.org/summer-meals/> [<https://perma.cc/M6KB-RHA7>]; see also We Got You Illinois, *supra* note 64 (noting that proof of immigration status is not required to participate in mentioned programs).

⁸⁹ See Immigrant Tenant Protection Act 765 ILCS 755 *et seq.* (West 2024).

⁹⁰ See *id.*, § 10.

⁹¹ *Id.*, § 10(b).

⁹² See Housing Authorities Act 310 ILCS 10/1 *et seq.* (West 2024).

These programs are administered on a day-to-day basis by these public housing authorities, which is the Chicago Housing Authority (CHA) for the City of Chicago. It is worth noting that availability of housing support for refugees and asylum seekers may be limited or unavailable, even if statutorily possible. For instance, CHA is currently taking no new applications Section 8 support is in Chicago at present.⁹³

The state has also promulgated a variety of regulations in the Administrative Code to set out the rules for each of the specific state-run housing programs.⁹⁴ Two such housing support programs for which refugees and asylum seekers qualify are the Low Income Home Energy Assistance Program (LIHEAP), administered by the Illinois Department of Commerce and Economic Opportunity (DCEO), and the Low Income Household Water Assistance Program (LIHWAP), both of which help eligible low-income households pay for home energy services (primarily heating during winter months).⁹⁵

An additional, robust housing support program initially created with federal support to respond to the COVID-19 pandemic is the Illinois Court-Based Rental Assistance Program (CBRAP), which is implemented by the Illinois Housing Development Authority (IHDA).⁹⁶ Illinois decided to continue CBRAP even after federal funding ended, and allocated \$75 million to this end in 2025.⁹⁷

To qualify for CBRAP, “tenants must meet the following criteria:

- “Primary tenant/applicant must be in a court-eviction proceeding and provide eviction court documentation.
- “The household is behind on rent and is at risk of experiencing homelessness or housing instability.
- “Current household income must be below 80% of the Area Median Income (AMI), adjusted for household size.
- “Proof of citizenship is not required.”⁹⁸

Thus, eviction support for refugees and asylum seekers is available, which includes rental assistance, as well as legal aid and mediation services.⁹⁹

⁹³ See Chicago Housing Authority (CHA), “Do I Qualify for Housing?” *website* (last visited 21 Apr. 2025), available at <https://www.thecha.org/do-i-qualify-housing> [<https://perma.cc/R879-GYHR>] (“CHA’s Housing Choice Voucher (HCV) waitlist is closed at this time.”)

⁹⁴ See 47 Ill. Adm. Code 380.101, *et seq.* (2017) (authorizing IHDA to administer the state-funded housing support program for people exiting the state prison system).

⁹⁵ See 47 Ill. Adm. Code 100.20, *et seq.* (2017) (regarding LIHEAP) *and*, § 105.10, *et seq.* (2017) (regarding LIHWAP); see *also* Illinois Housing Development Authority (IHDA), “Housing Help Is Here!,” *website* (last visited 21 Apr. 2025), available at <https://www.illinoishousinghelp.org/#utility-bill-assistance-ID> [<https://perma.cc/PP8M-5UAU>].

⁹⁶ See 47 Ill. Adm. Code 378.103 (2017).

⁹⁷ See *In re: State Funded Court-Based Rental Assistance Program*, Ill. S. Ct., M.R. 32420 (eff. Sep. 30, 2024).

⁹⁸ See Illinois Court-Based Rental Assistance Program Toolkit, at 1 (17 Sep. 2024); see *also* 47 Ill. Adm. Code 378.201(c) (2017) (setting forth CBRAP eligibility criteria).

⁹⁹ See Illinois Housing Development Authority (IHDA), “The Illinois Court-Based Rental Assistance Program Is Open,” *website* (last visited 21 Apr. 2025), available at <https://www.illinoishousinghelp.org/cbrap> [<https://perma.cc/FH9H-LXYV>].

Refugees Generally

Illinois has been one of the states that has specifically sought to welcome newly-arriving refugees, but also asylum seekers and migrants without documentation as well.¹⁰⁰ This welcome has taken several forms. The Governor's Office of New Americans was established in 2014 to "welcome and support immigrants and refugees in the State of Illinois".¹⁰¹ This remit extends widely to coordinate state government to support the integration of refugees and asylum seekers, and also other types of immigrants. As part of the act creating the Office of New Americans, every state agency in the Illinois executive branch was directed to develop a "New American Plan" that better integrate immigrants within their agency's area of authority.¹⁰² The act was enhanced in 2021 by an Executive Order creating the Welcoming Illinois Office, which was situated within IDHS to strengthen coordination within government and with external stakeholders, and also to make policy recommendations to support refugees and asylum seekers.¹⁰³ Additionally, IDHS has been authorized to lead an interagency effort to provide information to refugees and asylum seekers about both the resources available to them and their rights under law. The department has been directed to post these resources widely in "high-traffic public areas, including, but not limited to, train stations, airports, and highway rest stops."¹⁰⁴

Another aspect of Illinois's approach to refugee and asylum seeker integration is the work of Illinois Welcome Centers (IWCs). Since 2007, IWCs have been established across Illinois, including several in Chicago, to work with all types of migrants to help them find and access services and resources.¹⁰⁵ IWCs are seen as a comprehensive, one-stop shop and each IWC is run by an NGO with the whole program overseen by IDHS.¹⁰⁶

Illinois also authorizes the special support for refugees who have been resettled by the U.S. federal government to Illinois. This support for resettled refugees is based on federal funding.¹⁰⁷ As noted previously, this extra support for resettled refugees does not include food or housing assistance.

¹⁰⁰ See, e.g., Office of the Governor, "Gov. Pritzker Signs Legislation Further Establishing Illinois as the Most Welcoming State in the Nation," *press release* (2 Aug. 2021), available at <https://www.illinois.gov/news/press-release.23653.html> [<https://perma.cc/J6JS-S6RZ>].

¹⁰¹ Governor's Office of New Americans Act 15 ILCS 55/5(b)(1) (West 2024).

¹⁰² See *id.*, § 10.

¹⁰³ See Exec. Order No. 2021-17, 45 Ill. Reg. 10,290 (Aug. 2, 2021), <https://www.illinois.gov/government/executive-orders/executive-order.executive-order-number-17.2021.html> [<https://perma.cc/PVD8-86RB>].

¹⁰⁴ Dep't Hum. Serv. Act 20 ILCS 1305/10-67(b) (West 2024) (titled Rights and resources for immigrants, refugees and asylum seekers; public information campaign).

¹⁰⁵ See The Immigration Project, "Social Services," *website* (2025), available at <https://www.immigrationproject.org/social-services/> [<https://perma.cc/9WCX-4Z7R>].

¹⁰⁶ See IDHS, "Illinois Welcoming Center (IWC)," *website* (2023), available at <https://www.dhs.state.il.us/page.aspx?item=146538> [<https://perma.cc/L3KF-V2K5>].

¹⁰⁷ See 89 Ill. Adm. Code 115.30 (2017). Note that the general refugee resettlement program, which brings recognized refugees to the U.S. after the refugee status determination (RSD) process has been completed in another country, has not been discussed in this memorandum as it falls outside of food and housing issues for refugees.

iii. Chicago Law

Municipal Code Provisions

The Chicago Municipal Code (“Municipal Code”), in its chapter 6-10, has provisions to protect human rights generally, in which can be seen the classic “negative” conception of human rights: “It is the policy of the City of Chicago to assure that all persons within its jurisdiction shall have equal access to public services and shall be protected in the enjoyment of civil rights....” CHICAGO, ILL., MUNICIPAL CODE, § 6-10-010 (2007). As this statement of purpose suggests, that chapter focuses on anti-discrimination measures across of a range of personal characteristics and identities (i.e. gender, criminal record history, and credit history), but it does not extend its protections into “positive” rights.¹⁰⁸ In another portion of the Municipal Code, immigration status is incorporated as an additional protected class for non-discrimination purposes when one receives “City of Chicago benefits, opportunities, or services”.¹⁰⁹

Similar non-discrimination provisions specifically related to housing are part of chapter 5-8 of the Municipal Code, which encompass the Chicago Fair Housing Regulations. This chapter protects access to adequate housing by prohibiting discrimination based on “race, color, sex, gender identity, age, religion, disability, national origin, ancestry, sexual orientation, marital status, parental status, military status or source of income.” MUNICIPAL CODE, § 5-8-010. It is notable that immigration, refugee, or citizenship status are not protected classes as regards housing or real estate transactions, unlike for the receipt of city benefits, which leaves a large loophole in the Municipal Code’s anti-discrimination measures.¹¹⁰ For instance, it is not prohibited by the Municipal Code for a landlord states to not rent to someone due to their immigration status, which could also serve as a way to permit otherwise prohibited discrimination based on national or ethnic origin as the vast majority of immigrants in Chicago at present would fall into one of the other protected classes.

Additional protections for residential tenants in Chicago exist in chapter 5-12 of the Municipal Code, regarding Residential Landlords and Tenants. These are the classic tenancy protections like requiring landlords properly maintain the rental property and the like.¹¹¹ The Municipal Code carves-out various exemptions in these tenant protections, such as for owned-occupied building with six or fewer units, among others.¹¹² The chapter also regulates the eviction process in the city.¹¹³

The Municipal Code also creates a transitional shelter system in chapter 13-212.¹¹⁴ The code further authorizes the commissioner of the City of Chicago Department of Family and Support

¹⁰⁸ As “positive” versus “negative” conceptions of human rights law were discussed *supra*.

¹⁰⁹ Chicago Municipal Code § 2-173-040(a) (added Mar. 29, 2006) (incorporating part of the Welcoming City Ordinance). The Welcoming City Ordinance, chapter 2-173, codified Chicago’s sanctuary city status in the Municipal Code, which broadly prohibits cooperation by city officers and instrumentalities regarding immigration law enforcement or sharing of immigration status.

¹¹⁰ See, e.g., *id.*, § 5-8-030(A) (added Dec. 21, 1988) (setting forth unfair housing practices).

¹¹¹ See *id.*, §§ 5-12-070, 5-12-110 (added Sept. 8, 1986).

¹¹² See *id.*, § 5-12-020(a) (added Sept. 1986).

¹¹³ See *id.*, § 5-12-130 (added Sept. 1986).

¹¹⁴ This is in addition to the temporary overnight shelter system created by chapter 13-208 of the Municipal Code that only allows overnight stays of up to 12 hours in duration. See *id.*, § 13-208-040 (added Dec. 22, 1983).

Services (DFSS) to oversee transitional shelters and other types of housing support.¹¹⁵ Through this mechanism, the DFSS provides both homeless shelter services as well as a Rental Assistance Program (RAP). As will be described in more detail below, the former separate shelter system for migrants newly arriving in Chicago has now been folded into the existing temporary shelter system run by the city. Residence in transitional shelter can be for a maximum of 120 consecutive days.¹¹⁶ The RAP provides “short-term financial assistance for rent, utilities, arrears and other costs related to housing stability” and also housing stability case management for the people it assists.¹¹⁷

The words “refugee” and “asylum seeker” are not mentioned anywhere in the Municipal Code (“asylum” is used, but only in reference to residential care for mental illness). Immigration assistance is regulated through a licensing requirement.¹¹⁸

Food Regulation, Provision, and Equity in Chicago

General food safety regulations are found in the Municipal Code, such as the sanitary operation requirements set forth for restaurants in chapter 7-38, which is titled “Food Establishments – Sanitary Operating Requirements,” but food provision to individuals is not otherwise referenced in the Municipal Code. Based on the research conducted, it does not appear that there is an independent city program, at least not one laid out in publicly-published materials, regarding food provision to individuals beyond what is set forth by Federal or State law.

However, Chicago Executive Order 2022-1, which was promulgated on 2 February 2022, set up a Food Equity Council (FEC) in the city, and that order expressly recognized that “all Chicagoans should be able to access nutritious, affordable, culturally appropriate food that is locally, sustainably, ethically, and fairly produced.” The FEC is charged with implementing Chicago’s Food Equity Agenda, which aims to increase the number of food pantries; increase use of nutrition programs; assist local food producers; promote urban farming; and support Black, Indigenous, and People of Color (BIPOC) food businesses.

Thus, while the right to adequate food as conceived of in international law is not expressly incorporated in the Chicago Municipal Code, the city has committed to promoting the key principles of that right through the FEC and the city’s support for, what it calls, food equity. Food equity as conceived of in Executive Order 2022-1 addresses all four of the pillars of the right to adequate food. This can be seen even more clearly in the 2023 Annual Report of the FEC, which talks about food equity and food sovereignty, and how those concepts should be applied in Chicago, explicitly as those terms are defined in international law:

“Food Equity is the belief that people should have equal access to the ability to grow and consume nourishing, affordable, and culturally significant foods.

“Food Sovereignty is the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems. It puts the aspirations and needs

¹¹⁵ See, e.g., *id.*, § 2-50-040(g) (added Nov. 19, 2008) (authorizing the planning, initiation, supervision, and coordination of services to prevent and end homelessness).

¹¹⁶ See *id.*, § 13-212-040 (added Dec. 22, 1983).

¹¹⁷ See City of Chicago, “Family & Support Services: Homeless Services,” *website* (last visited 21 Apr. 2025) available at <https://www.chicago.gov/city/en/depts/fss/provdrs/emerg.html> [<https://perma.cc/8545-HXFA>] (listing other services provided around housing as well).

¹¹⁸ See, e.g., Chi. Mun. Code § 4-6-240 *et seq.* (added May. 9, 2012).

of those who produce, distribute and consume food at the heart of food systems and policies rather than the demands of markets and corporations.”¹¹⁹

The 2023 Annual Report further referenced the Declaration of Nyéléni, from the first global forum on food sovereignty that took place in Mali in 2007.¹²⁰ While this annual report is not binding on the city government, it does provide strong guidance as to the goals of the city as regards the right to adequate food in Chicago.

Despite these laudable efforts to address food equity and food sovereignty in Chicago – which address all four pillars of the right to adequate food delineated in international law – they face two critical weaknesses. First, these efforts to strengthen food equity and sovereignty seem to have been deprioritized by the current mayoral administration, which has focused on other (equally as important) areas, such as the migrant-related initiatives described in the next sub-section. Little documentation was found on the work of the FEC subsequent to 2023 and it was not clear if any annual reports have been issued since that year either. Second, even in the well-researched and reasoned work of the FEC previously undertaken, the specific needs of the refugee and asylum seeker communities in Chicago were not addressed. While refugees would presumably benefit from a general increase in food equity and food sovereignty, their distinctive vulnerabilities and needs in this regard were not considered in the published documentation of the FEC.

Refugee Executive Orders

The Executive Order 2023-16 on Immigrant, Migrant, and Refugee Rights established a Deputy Mayor for Immigrant, Migrant, and Refugee Rights to oversee an office of immigrant, migrant, and refugee rights within the broader Mayor's Office. This Deputy Mayor is tasked with coordinating city efforts to support, among other people, refugees in the City of Chicago. Appointing a Deputy Mayor to focus solely on immigration and refugee issues built upon the previous creation of Chicago's Office for New Americans that was re-established by an earlier order, Executive Order 2023-7, titled “Mayor's Office of New Americans,” after being initially established in 2011. It is unclear from the written sources, but it appears that the former Office of New Americans was simply renamed as the Office of Immigrant, Migrant, and Refugee Rights when its status was upgraded to be overseen by a Deputy Mayor. Hence, the city has committed to the protection of immigrant and refugee rights as well as providing support to those communities across the administrations of the past three mayors.

The Office of Immigrant, Migrant, and Refugee Rights lists six areas of intervention on its website: citizenship; Deferred Action for Childhood Arrivals (DACA); Welcoming City resources; undocumented students; language access; and New Arrivals Mission.¹²¹ The website of the office does not mention food or housing on its main page, although there some references to the shelter system that was set up for new arrivals in 2022-23 transitioning to the “One System Initiative” (OSI) that combines the previously separate shelter processes for migrants arriving in Chicago

¹¹⁹ Chicago Food Equity Council, *2023 Annual Report*, at 14, *website* (last visited 21 Apr. 2025), available at <https://www.chicago.gov/content/dam/city/sites/food-equity/pdfs/2023%20Chicago%20Food%20Equity%20Council%20Annual%20Report.pdf> [https://perma.cc/F4Y3-KGVX] (boldface in the original).

¹²⁰ See World Forum for Food Sovereignty, “Declaration of Nyéléni” *conference report*, (27 Feb. 2007), available at <https://nyeleni.org/IMG/pdf/DeclNyeleni-en.pdf> [https://perma.cc/7SHR-T7MH].

¹²¹ See City of Chicago, “Office of the Mayor: Office of Immigrant, Migrant, and Refugee Rights,” *website* (last visited 21 Apr. 2025) available at https://www.chicago.gov/city/en/depts/mayor/provdrs/office_of_new_americans.html [https://perma.cc/9RHC-BLUL].

and non-migrant houseless people in the city. This combined shelter system is operated by the city's DFSS.

iv. *Cook County Law*

Cook County law, as reflected in its Code of Ordinances (“County Code”), is typically subordinate to Chicago’s Municipal Code.¹²² The County Code reflects Chicago’s Municipal Code in many respects. Particularly, this can be seen with the County Code’s approach to human rights. Chapter 42, article II of the County Code generally covers human rights, and this is primarily an anti-discrimination approach. Of note is section 42-38, which prohibits various types of discrimination in housing across most types of real estate transactions.¹²³ As with the Municipal Code, immigration or refugee status is not one of the enumerated protected classes in the County Code.

One way that the County Code expands upon the Municipal code is through the establishment of a Commission on Human Rights.¹²⁴ The Commission on Human Rights provides for a complaint process for individuals when the anti-discrimination provisions of the human rights set forth in Article II of the County Code of Ordinances are alleged to have been violated.¹²⁵ There are a wide range of remedies in law and equity if the Commission finds for a complainant, including an order to “lease housing in question to the complainant”.¹²⁶

c. *Austrian Law*

The Austrian federal government plays a leading role in the administrative and legal oversight of refugees and asylum seekers in the whole country,¹²⁷ as well as for direct service provision for the initial reception of asylum seekers, support for voluntary return, and legal aid for displaced persons. The national government also funds a variety of refugee and asylum seeker support programs that are implemented by the federal states of Austria. Each federal state handles the provision of basic services for refugees and asylum seekers differently, and Vienna is the focus of this memorandum.¹²⁸

The national government handles its direct responsibilities for refugees and asylum seekers through an agency of the national Ministry of Interior called the Federal Agency for Reception and Support Services (hereinafter, the “BBU,” an acronym of the entity’s German name, *Bundesagentur für Betreuungs- und Unterstützungsleistungen*). The structure and working of the BBU is described in the first subsection below.

¹²² See Cook County, Ill., Code of Ordinances (2006), § 42-33(b).

¹²³ See *id.*, at § 42-38(b)(1).

¹²⁴ See *id.*, at § 42-34 (establishing a county human rights commission).

¹²⁵ See *id.*, at § 42-34(b)(1).

¹²⁶ *Id.*, at § 42-34(c)(1)(d).

¹²⁷ Austria has an additional category of protection for migrants called “subsidiary protection,” in which a person may be a risk in their home country but may not have an individualized fear of persecution. Subsidiary protection status in Austria provides for less benefits and a shorter period of validity before it has to be renewed than does recognized refugee status. See ASYLGESETZ 2005 [ASYLUM ACT 2005], *supra* note 18, at §§ 8-9, 67.

¹²⁸ Vienna is both a city (*Stadt Wien*) and a federal state (*Land Wien*), which are co-extensive geographically and have the same political leadership, but with slightly different governmental roles and structures. For purposes of this memorandum, Vienna is treated as a single municipal entity. See City of Vienna, “Vienna – a regional authority,” *website* (last visited 21 Apr. 2025), available at <https://www.wien.gv.at/english/administration/organisation/authority/> [<https://perma.cc/N4GY-79VE>].

Next follows a discussion of the substantive law in Austria around food and housing for refugees and asylum seekers that considers the federal law (*Österreichisches Bundesrecht*) and Viennese law (*Wiener Landesrecht*) in turn. Austria's federal system means that responsibility for oversight and support regarding food and housing for refugees and asylum seekers is split between the national government (*Bundesregierung*) and the state governments (*Landesregierungen*).

i. BBU and Reception

As mentioned, the BBU was created to have responsibility for the Austrian federal government's direct service provision to and human rights protection of refugees.¹²⁹ The BBU is tasked especially with providing legal advice and voluntary return support to refugees and asylum seekers, but also providing certain basic care needs for displaced persons when they first arrive in Austria.¹³⁰ Specifically, the BBU has three main areas of responsibility: basic care for newly-arrived asylum seekers; legal advice and representation; and return counselling and services.¹³¹ The refugee status determination process is handled by a different federal entity in Austria, Federal Office for Immigration and Asylum (*Bundesamt für Fremdenwesen und Asyl*), although, as stated before, the BBU provides legal support to asylum seekers about that process.¹³²

When migrants arrive in Austria without prior approval, such as due to family reunification, and without the ability to provide for their own subsistence,¹³³ the BBU provides temporary housing as well as food assistance according to their statutory mandate.¹³⁴ Asylum seekers are housed at first in a reception center, which Austrian authorities sometimes refer to as a “camp,” and which has a barracks-like character. The largest and most prominent of these reception centers for asylum seekers is located in the town of Traiskirchen, which is about 20 miles (30 kilometers) south of Vienna in the state of Lower Austria. While at the camp, asylum seekers receive three meals per day in addition to accommodations.¹³⁵ The BBU states that “pork is never served at any meals” in their camps, presumably to respect Muslim dietary restrictions, and also that asylum

¹²⁹ BBU-ERRICHTUNGSGESETZ [BBU ESTABLISHMENT ACT] BUNDESGESETZ [BG] BGBl I No. 53/2019, as last amended by BG BGBl I No. 134/2024, (last visited 21 Apr. 2025) available at <https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=20010683> [<https://perma.cc/ZT7K-XZCA>] (Austria).

¹³⁰ See Federal Agency for Reception and Support Services (BBU), “What we do,” *website* (last visited 21 Apr. 2025), available at <https://www.bbu.gv.at/en/what-we-do> [<https://perma.cc/X9HR-UPBQ>].

¹³¹ See BBU, “Your asylum procedure in Austria,” *brochure* (Aug. 2022) (BBU Brochure), at 5, (last visited 21 Apr. 2025) available at https://www.bbu.gv.at/wp-content/uploads/2023/11/BBU-UMF-Broschuere-2022_DE-EN.pdf [<https://perma.cc/UDZ3-JW2C>].

¹³² Although not directly relevant to food and housing support, it is worth noting that in 2023, the Austrian Constitutional Court ruled that the legal advice for asylum seekers provided by the BBU was not sufficiently independent due to the BBU's placement within the Ministry of Interior, thereby violating the right to an effective legal remedy. The court thus found the relevant provisions of the BBU law unconstitutional and gave lawmakers until July 1, 2025, to amend the law to ensure it would pass constitutional muster. The BBU was thereafter structured as an independent corporation (*GmbH*), which was found to be constitutionally compliant. See *Verfassungsgerichtshof Österreich* (Constitutional Court of Austria), “*Rechtsberatung für Asylwerber durch Betreuungsagentur ist nicht hinreichend unabhängig* (Legal advice for asylum seekers by care agencies is not sufficiently independent),” *case summary* (22 Dec. 2023), available at <https://www.vfgh.gv.at/medien/BBU.php> [<https://perma.cc/UG9Z-3KJT>].

¹³³ See GRUNDVERSORGUNGSVEREINBARUNG – ART. 15A B-VG (BUND – LÄNDER) [BASIC WELFARE AGREEMENT PURSUANT TO ART. 15A OF THE CONSTITUTION] BUNDESGESETZ [BG] BGBl I No. 3/2025, §§ 1(1), 2(1)(1), 3(1).

¹³⁴ See BBU ESTABLISHMENT ACT, *supra* note 129, at § 2(1)(1).

¹³⁵ See BBU Brochure, *supra*, note 131, at 11.

seekers should inform staff if they do not like the food served in the camp as there may be other options.¹³⁶

Reception facilities open and close primarily based on the number of asylum seeker arrivals with some consideration of other factors, such as COVID-19 distancing requirements in 2021-22.¹³⁷ Following a decrease in applications in 2019 and 2020, and due to the lack of cost adjustments for accommodation of asylum seekers in the provinces, many NGO-led accommodation centers closed during this period. Additionally, the influx of Ukrainian asylum seekers and political debates concerning refugees during regional electioneering in three states further hindered cooperation in asylum seeker accommodation in 2019-20.¹³⁸

Asylum seekers are meant to stay at a reception center only for a limited period of time while their asylum claim is processed. Once an asylum seeker receives a “white card” indicating that their asylum request is officially registered and ongoing in Austria, they move out of the reception center into other housing provided by the relevant state government where their new residence is located.¹³⁹ Refugees and asylum seekers are allocated to the various Austrian federal states according to a formula agreed between the states and the federal government based on the relative population size of each state.¹⁴⁰

In cases of high numbers of arrivals or difficulties in transferring asylum seekers to the federal states, asylum seekers may stay an additional 14 days in the federal reception center, even if eligible for transfer to state-provided basic care (*Landesgrundversorgung*). By winter 2022, the reception center system reached its housing limit as federal states were reluctant to accept transfers of “white card” holders. Consequently, the Ministry of Interior ordered new arrivals to be accommodated in tents on federally-owned land at the BBU reception centers in the regions, although this situation has eased with a reduction in new asylum seekers arriving in Austria in recent years.

ii. *Federal Law (Österreichisches Bundesrecht) Generally*

Federal law in Austria also sets forth the general provisions for basic support for recognized refugees (*Asylberechtigte*), asylum seekers (*Asylwerber*), and other persons with subsidiary protection for humanitarian reasons (*Subsidiärer Schutz*) outside of reception centers. Food assistance for displaced persons is covered by the broader Basic Welfare Support scheme (*Grundversorgung*) (GV), while most housing support is covered by the “Social Assistance” (*Sozialhilfe*). Once they are recognized as belonging to an included group, displaced persons are eligible for welfare support benefits, such as the Needs-Based Minimum Social Benefit scheme (*bedarfsorientierte Mindestsicherung*) (BMS), which is a monetary payment. The BMS payments

¹³⁶ *Id.*

¹³⁷ While 32 reception centers operated in 2017, only 11 federal centers were in use in 2019, 13 in 2020, 24 at the end of 2021, and 27 in 2022. This variation in camp numbers is due to the variation in asylum applications, as each reception center has a maximum capacity of 8,000.

¹³⁸ See *asylkoordination österreich*, “Reception conditions: Housing/Types of accommodation,” *Asylum Information Database website*, (last visited 21 Apr. 2025), available at <https://asylumineurope.org/reports/country/austria/reception-conditions/housing/types-accommodation/> [https://perma.cc/9QJK-RYLF]; and *asylkoordination österreich*, “Reception conditions: Housing/Conditions in reception facilities,” *Asylum Information Database website* (last visited 21 Apr. 2025), available at <https://asylumineurope.org/reports/country/austria/reception-conditions/housing/conditions-reception-facilities/> [https://perma.cc/285V-LRXS].

¹³⁹ See BASIC WELFARE AGREEMENT PURSUANT TO ART. 15A OF THE CONSTITUTION, *supra* note 133, § 4(1).

¹⁴⁰ See *id.*, at § 1(4).

are organized differently depending on the federal state, so that different target groups also have different levels of support.¹⁴¹ These broad, nationally-applicable frameworks around food and housing support for displaced persons are explored below,¹⁴² which is then followed by a discussion of the application these forms of food and housing support in Vienna.

Austrian federal law draws distinctions between the quantum of support received by different categories of migrants, similarly to American law. As in the U.S., recognized refugees have the most protections and receive the most support from the government, while registered asylum seekers have a lower quantum of protection and support.¹⁴³ One of the leading refugee advocacy non-governmental organizations in Austria, *asylkoordination österreich*, puts it succinctly: “[P]ersons entitled to asylum are treated equally to Austrians from the time they are granted status. This means that persons entitled to asylum and subsidiary protection can receive minimum security/social assistance from the time they are granted protection.”¹⁴⁴ Also like the U.S., asylum seekers receive less monetary assistance from the government than do recognized refugees, although they do receive basic welfare support, which covers food and housing assistance. As described above, federal law in the Social Assistance Basic Act also sets forth the extent to which refugees get housing and food support once they are recognized, which is coextensive to what Austrian citizens receive.¹⁴⁵

According to the agreement between the federal government and the state governments, asylum seekers and refugees in Austria are to be provided with “basic care” (through the GV), which includes, among other things, housing “in a suitable accommodation with respect for human dignity and family unity” and the “[p]rovision of adequate food.”¹⁴⁶ Initially, this responsibility to provide basic care (GV) for displaced persons rests with the federal government when someone initially lodges an asylum claim, as discussed previously. This is typically when an asylum seeker arrives in Austria for the first time.¹⁴⁷ This requirement is echoed in the provisions of the Basic Welfare Act – Federal 2005 that requires the states to provide the same level of basic care to

¹⁴¹ For instance, only in the states of Vienna and Tyrol can privately-housed individuals with subsidiary protection apply for an additional compensatory allowance to supplement the “Basic Welfare Support” they receive federally and increase it to the level of “Social Assistance” received by recognized refugees.

¹⁴² The Austrian federal government also provides, through the states, a minimum income (*Mindestsicherung*) for recognized refugees as part of the social support law. Although this minimum income certainly helps refugees to obtain adequate food and adequate housing, it is not specifically a food or housing intervention. Hence, it is not explored in more detail.

¹⁴³ While not explored in this memorandum, people on the move without recognized legal status in the country, such as undocumented migrants, receive substantially less support in Austria, as in the US.

¹⁴⁴ Gahleitner-Gertz, Lukas, “Debate on Minimum Income: Our FAQs (*Debatte um Mindestsicherung: Unsere FAQs*),” *asylkoordination österreich website* (11 Aug. 2024), available at <https://www.asyl.at/de/wir-informieren/dossiers/mindestsicherung-faqs/> [<https://perma.cc/5S4Y-44YT>] (original in German, translation by the research team).

¹⁴⁵ See SOZIALHILFE-GRUNDSATZGESETZ [SOCIAL ASSISTANCE BASIC ACT] BUNDESGESETZ [BG] BGBl I No. 41/2019, at § 2, as last amended by BG BGBl I No. 144/2024, (last visited 21 Apr. 2025), available at <https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=20010649> [<https://perma.cc/HPR9-Y9DB>] (Austria). Additional information about the exact amounts received is provided by the Federal Ministry of Social Affairs, Health, Care, and Consumer Protection on its website. See “Leistungen (Services),” (1 Jan. 2025), available at <https://www.sozialministerium.at/Themen/Soziales/Sozialhilfe-und-Mindestsicherung/Leistungen.html> [<https://perma.cc/3PQQ-4HJG>].

¹⁴⁶ See BASIC WELFARE AGREEMENT PURSUANT TO ART. 15A OF THE CONSTITUTION, *supra* note 133, § 6(1).

¹⁴⁷ See *id.*, at § 3(1).

asylum seekers once they arrive in a state.¹⁴⁸ Every federal state conceives of and administers their statutory obligation to provide support to refugees and asylum seekers differently. Some states provide flexible spending cards for food and other basic support that are essentially cash equivalents can be used similarly to credit or debit cards and have an IBAN account number that can be used for many types of cash transfers, including online purchases.¹⁴⁹ Other states are more restrictive regarding the operation of payment cards, such as only topping them up by small amounts and confining their use to approved stores. Some commentators find this approach to be a form of harassment of refugees and asylum seekers, which may be being used by state governments to discourage displaced persons from settling in those states.¹⁵⁰

iii. *State Law of Vienna (Wiener Landesrecht)*

Unlike some states, Vienna is one of the federal states of Austria that provides more support for refugees and asylum seekers above the core social assistance benefits that are required by the agreement between the national government and the federal states. For instance, while basic support in Vienna is means-tested, Vienna's minimum benefits law also specifically increases the amount of the housing support benefit for refugees above what is required by Austrian federal law and also explicitly includes additional support to cover home energy costs.¹⁵¹ This support is expressly provided to people "treated as equal to Austrian citizens (equal status) and meet certain additional qualifications, typically includes refugees and people with subsidiary protection."¹⁵²

In addition to qualifying for housing support, refugees also receive further basic welfare support and protection in Vienna. This Viennese state legislation provides for additional "temporary basic welfare support for vulnerable and needy foreigners" in Vienna, which also includes asylum seekers.¹⁵³ The state-enhanced basic welfare includes both accommodation and provision of

¹⁴⁸ See GRUNDVERSORGUNGSGESETZ – BUND 2005 [FEDERAL BASIC WELFARE ACT 2005] BUNDESGESETZ [BG] BGBl I No. 405/1991, at § 6(1), as last amended by BG BGBl I No. 53/2019, (last visited 21 Apr. 2025), available at <https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10005762> [https://perma.cc/L856-X9TK] (Austria).

¹⁴⁹ In Vienna, financial support for organized accommodation includes €40 per month incidentals allowance, €6.50 per day for food, and €10 per month for leisure activities. For private housing, adults receive €260 per month for food, while minors in families each get €145 and unaccompanied minors receive €260 each. Additionally, there are rent subsidies (€165 per person or €330 per family) provided in Vienna. See Langthaler, Herbert, "Payment Card: Harassment instead of Efficiency (*Bezahlkarte: Schikane statt Effizienz*)," *asylkoordination österreich, website* (last visited 21 Apr. 2025), available at <https://www.asyl.at/de/wir-informieren/dossiers/bezahlkarte-schikane-statt-effizienz/> [https://perma.cc/WKH4-Z68E] (original in German, translation by the research team).

¹⁵⁰ See *id.*

¹⁵¹ See WIENER MINDESTSICHERUNGSGESETZ [VIENNA MINIMUM SECURITY ACT] LANDESGESETZ [LG] LGBL No. 38/2010, at § 18, as last amended by LG LGBL No. 16/2024, (last visited 21 Apr. 2025), available at <https://www.jusline.at/gesetz/wmg/gesamt#:~:text=%C2%A7%2018%20WMG%20Sachleistungen,an%20dritte%20Personen%20ausgezahlt%20werden> [https://perma.cc/A494-7PGB] (Austria).

¹⁵² City of Vienna, "Vienna Housing Benefit ('Wohnbeihilfe'), *information leaflet* (und.), at 1, (last visited 21 Apr. 2025), available at <https://www.wien.gv.at/wohnen/wohnbaufoerderung/ahs-info/pdf/infoblatt-wohnbeihilfe-englisch.pdf> [https://perma.cc/657P-QM36]; see also *id.*, at § 5(3).

¹⁵³ WIENER GESETZ ÜBER MAßNAHMEN ZUR VORÜBERGEHENDEN GRUNDVERSORGUNG FÜR HILFS- UND SCHUTZBEDÜRFTIGE FREMDE [VIENNA TEMPORARY BASIC WELFARE SUPPORT FOR VULNERABLE AND NEEDY FOREIGNERS ACT] LANDESGESETZ [LG] LGBL No. 46/2004, at § 1(3), as last amended by LG LGBL No. 49/2018, (last visited 21 Apr. 2025), available at

adequate food.¹⁵⁴ Hence, while asylum seekers may not receive as much housing support in Vienna as refugees do because they do not qualify for the Vienna Housing Benefit (*Wohnbeihilfe*) mentioned previously, they do get more social benefits pursuant to the Vienna Temporary Basic Welfare Support for Vulnerable and Needy Foreigners Act (*Wiener Gesetz über Maßnahmen zur Vorübergehenden Grundversorgung für Hilfs- und Schutzbedürftige Fremde*).

<https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=LrW&Gesetzesnummer=20000258>
[<https://perma.cc/XUL9-VXGS>] (Austria).

¹⁵⁴ See *id.*, at § 3(1).

FINDINGS

The 11 Findings identified in the research are set forth in this section, and the Recommendations developed based on the Findings follow immediately in the next section.

a. Regarding the Right to Adequate Food

The analysis of the right to adequate food for refugees and asylum seekers in Chicago and Vienna were guided by the four pillars of that right laid out in international law: Availability, Accessibility, Adequacy, and Sustainability.

Finding 1: Food is generally available and accessible to refugees and asylum seekers in Chicago and Vienna.

In both Chicago and Vienna, food is generally available “in quantity and quality sufficient to satisfy the dietary needs of” refugees and asylum seekers resident in those cities as suggested by the Voluntary Guidelines.¹⁵⁵ It is also generally accessible physically from a variety of different supermarkets or other food stores located in close proximity to where refugees and asylum seekers live and work. Refugees in Vienna frequently mentioned several supermarket brands in Vienna – like Billa, Hofer, Lidl, and Penny – as well as in-house labels of those supermarkets – such as Clever, Billa and Penny’s shared house brand at a cheaper price point.¹⁵⁶ This shows the presence of these well-known and government-regulated food shops in the lives of refugees and asylum seekers in Vienna, and underlines the physical availability and accessibility of enough food.¹⁵⁷ Many of the female FGD participants in Vienna also emphasized that they go primarily to the discounted food stores like Hofer and Lidl to save money.

What is also clear from the word cloud in Figure 3 is that food in Vienna is expensive, as that word is one of the most common used by refugees and asylum seekers, along with other words about food costs, including buy, discount, pay, price, and prices. The word “cheap” also appears in the word cloud, and it was most often used in the context of needing to locate or purchase the less expensive food items possible. The Voluntary Guidelines explain that “economic accessibility for everyone, including vulnerable groups, to adequate food” is also a requirement of the right to adequate food.¹⁵⁸

Food affordability: Food costs were the most persistent concern of refugees and asylum seekers participating in the qualitative research in Vienna and Chicago. Several Key Informants in Vienna noted that, in their experiences, refugees acknowledge Austria’s relatively strong social safety net, but also highlighted gaps like stagnant social aid and higher food prices compared to countries like Germany. This situation contributed to making food less accessible than it would be otherwise in Vienna. As one FGD participant in Vienna said, “living costs have risen, food prices have risen, prices of everything have risen.” This was echoed in FGDs in Chicago; one representative comment about food was that: “Prices for everything have gone up, and it’s hard for people to afford shopping.” Despite high prices, participants in both cities acknowledged that

¹⁵⁵ Voluntary Guidelines, *supra* note 36, at 3 (Preface, para. 16).

¹⁵⁶ For more on these supermarkets, see their corporate websites: <https://www.billa.at/>, <https://www.lidl.at/>, <https://www.penny.at/>, and <https://www.hofer.at/de/homepage.html>.

¹⁵⁷ For an excellent discussion of food availability in Austria, see generally FIAN Austria, “Access to Food: Mapping and Assessing Existing Measures in Austria,” *Module 2: “Responding to Hunger: A toolkit for learning and action”* (Aug. 2022).

¹⁵⁸ Voluntary Guidelines, *supra* note 36, at 3 (Preface, para. 16).

they were able to obtain adequate food on a consistent basis, often cooking traditional dishes such as the Afghan ones mentioned by participants in a Chicago FGD of *mantu* (dumplings), *palaw* (rice pilaf), and *bolani* (flatbread). However, most FGD participants in Chicago and Vienna said that food unaffordability meant that they had to make difficult choices about whether to purchase culturally-appropriate as doing so meant less money for other household necessities like rent or utilities.

Refugees in both places receive governmental benefits to different degrees as set forth in detail in Section 5 above. In Chicago, this would be primarily SNAP and WIC (for refugee parents with children five years old or younger), while in Vienna basic care is provided including through GV support. Several FGD participants and Key Informants mentioned the importance of these support mechanisms. Unfortunately, in the U.S., SNAP benefits have been substantially reduced by Congress at the request of the current presidential administration after the conclusion of the data collection for the PRAXIS research, and it is expected that these reductions will have a strongly negative effect on refugees' access and availability to adequate food in Chicago.¹⁵⁹ It appears that most of the refugees and asylum seekers that participated in FGDs would not now qualify for SNAP benefits based on recently-passed legislation.¹⁶⁰

Situation in Vienna for food: As Austria initially houses asylum seekers arriving in the country in the BBU-administered reception centers, Key Informants and FGD participants in Vienna shared information both about the conditions with food for both those reception centers and when refugees and asylum seekers were living independently in Vienna after receiving their “white card”. Both Key Informants and FGD participants stated that where food allowances were paid and asylum seekers had the possibility to cook, the reception facilities were perceived more positively.

In Vienna, once refugees and asylum seekers were living on their own, rising food prices have significantly strained low-income households, according to FGD participants as well as NGO and governmental Key Informants. Social aid recipients, especially single parents, were also cited as a group being particularly impacted by high food prices as benefit support levels remained unchanged in recent years despite increasing inflation. As mentioned before, coping strategies for refugees and asylum seekers facing high food prices included cutting back on meat and clothing, while utilizing discount stores and food pantries.

Food pantries: Food access and availability was also supported by food pantries in both Chicago and Vienna. Chicago has a particularly robust food pantry system facilitated and to some sense overseen by the Greater Chicago Food Depository (GCFD), in which several of the refugee support NGOs about which data was collected participated.¹⁶¹ Several of the FGDs for the

¹⁵⁹ “The House-passed Republican reconciliation plan would cut nearly \$300 billion from SNAP through 2034, based on [Congressional Budget Office] CBO estimates — by far the largest cut (30%) to SNAP in history.... CBO estimates that, together, these provisions would cut 3.2 million adults off SNAP in a typical month.” Katie Bergh, Dottie Rosenbaum, and Wesley Tharpe, “House Reconciliation Bill Proposes Deepest SNAP Cut in History, Would Take Food Assistance Away From Millions of Low-Income Families,” Center on Budget and Policy Priorities *report* (28 May 2025), available at <https://www.cbpp.org/research/food-assistance/house-reconciliation-bill-proposes-deepest-snap-cut-in-history-would-take> [https://perma.cc/UF78-BFBE].

¹⁶⁰ See Katja Frommer, “Congress Further Limits Immigrants’ Access to Public Benefits,” *blog* (16 Jul. 2025), available at <https://serottelaw.com/congress-further-limits-immigrants-access-to-public-benefits/> [https://perma.cc/PF2C-GN82].

¹⁶¹ See Greater Chicago Food Depository (GCFD), *website* (last visited 17 Jul. 2025), available at <https://www.chicagosfoodbank.org/> [https://perma.cc/B85C-K6TV].

PRAxIS research were conducted in NGOs that also operated food pantries and some of the FGD participants had just picked up food supplies immediately before the FGD session. Therefore, some FGD participants may have been supportive of the work of food pantries than otherwise, but the work of the food pantries was observed by the researchers and the statements of Key Informants who were not affiliated with the GCFD in any way corroborated the strong work done in this area. In Vienna, the situation with food pantries was similar, as NGO Key Informants indicated equally that food pantries were good at providing sufficient foodstuffs, but that refugees and asylum seekers were not always able to access the fresh, local, and culturally appropriate foods that they preferred. Viennese food pantries offered inconsistent quality and limited choices according to these Key Informants.



Photo 1 - Greater Chicago Food Depository access card held by a refugee at a food pantry.

Finding 2: Refugees and asylum seekers prefer fresh, local, and culturally appropriate food, which is often lacking.

Nutritious and culturally-appropriate food is often available in Chicago and Vienna, as both cities have significant existing diaspora communities of Afghans, Iraqis, and Syrians, and to a lesser extent Rohingyas, that own stores and restaurants providing these sorts of food. While it is available, however, nutritious and culturally-appropriate food is not always accessible, affordable, or utilized by refugees and asylum seekers according to FGD participants.

Service providers and government officials see food as an important part of refugee support, but focus is on availability, such as facilitating benefits sign-ups and connecting refugees to food pantries. There is much less emphasis on healthy, locally-produced, or fresh food. An NGO Key Informant in Chicago shared that service providers “don’t focus on it as much as we should,” and gave an example that a nutritionist that had been on their staff that had previously conducted nutrition workshops for refugees and had taken refugees food shopping, “but that funding disappeared quite a long time ago.”

Specifically, organic food remains out of reach to the majority of refugees and asylum seekers in both Vienna and Chicago due to cost, reinforcing dietary inequality. An FGD participant in Vienna noted that most food consumed in Afghanistan is, at least subjectively believed to be, organic. Hence, participants suggested that Afghans in Vienna want to buy organic food, which they believe to be healthier. However, as one Vienna FGD participant stated, “in Austria, maybe organic [food] is more expensive than other brands.” Two NGO Key Informants in Vienna repeated this concern, stating that organic food was largely inaccessible to low-income refugee groups and food pantries users, due mainly to higher costs and perceived exclusivity.



Photo 2 - Fresh food distribution at the ICNA food pantry in Chicago.

Food pantries try to accommodate refugees' desire for culturally appropriate food, but they are limited by the food donations received. For instance, ICNA, an NGO in Chicago that distributes food on Devon Avenue in the heart of the city's South Asian diaspora neighborhood, carefully sorted and labelled food in its pantry to highlight nutritious food as well as showing clearly which food was *halal*, meeting Islamic religious requirements. ICNA also presented a good practice example for food pantries by providing fresh food – including meat, fruit, and vegetables. In most cases, however, refugees and asylum seekers are left to figure out where they can get nutritious or culturally appropriate food for themselves as the Research Story 1 shared in this sub-section shows.

Research Story 1: (Afghan Refugee in Chicago)

“So, our case manager told us, and then their organization ... told us that Devon is a place where you can find a lot of good foods, a lot of food. And, and then I was also searching, you know, using Google Maps, like searching for Afghan food.”

A concern for many of the refugees shopping for food was that it be religiously acceptable. To ensure that their meat purchases were *halal*, for example, several of the Afghan women in Viennese focus groups stated that they exclusively went to Turkish-owned food shops, which stocks *halal* meat for the broader Muslim community in Vienna.

Food Equity and Food Sovereignty: There has been no appreciable discussion of food equity or food sovereignty within the refugee sector in either city, even when the topics have been discussed more broadly, such as with the establishment of Chicago's Food Equity Council (FEC) by mayoral executive order in 2022 and the 2023 promulgation of Chicago's Food Equity Agenda.

As noted in Section 5(b)(iii)(2) of this report, the FEC and the executive order creating it expressly sought to promote food equity and food sovereignty for “all Chicagoans”, but there was no connection of these issues with the refugee community in the city.¹⁶² While the qualitative data collection did not have any informants working on urban farming or BIPOC owners of food businesses, two areas within the FEC’s remit, the researchers did ask participants questions about food pantries and nutrition programs. The data collected suggested that the work of the FEC or of the City of Chicago on food equity and sovereignty was not seen as influential and did not appear to be well-known in the refugee service provision sector or amongst forced migrants in Chicago.

b. Regarding the Right to Adequate Housing

The seven pillars of the right to adequate housing described in the relevant General Comment to the ICESCR – Legal Security of Tenure; Affordability; Habitability; Availability of Services, Materials, Facilities, and Infrastructure; Accessibility; Location; and Cultural Adequacy – were used to structure the analysis.¹⁶³

Finding 3: Rent for private apartments was too high for refugees without monetary support and public housing was often difficult to access.

Finding 4: Legal status determines access to services.

Both Vienna and Chicago have private housing rental markets that have gotten significantly more expensive in recent years,¹⁶⁴ making prices problematically high for refugees and asylum seekers in both cities. These affordability difficulties often result in habitability challenges for refugees, with refugee and asylum seekers sharing apartments with more people than the apartment was designed to house or having to accept apartments with insufficient services for their needs.

Adriano Gasparini, Housing Manager for the NGO RefugeeOne and a Key Informant, said in his KII: ““It starts with the fact that the affordability for housing in Chicago is insane. I would say that it's not even every year, but is every six months, prices have been changing, in the last three years. So, finding affordable housing in decent areas in Chicago for people to be able to take over rent payments later and be self-sufficient -- it's very hard.”

This situation is doubly exacerbated in Chicago as there is little financial rent support from the government or NGOs for refugees and the general unavailability of governmental housing support programs, like public housing and Section 8 subsidies. Viennese public housing is much more extensive and less expensive than in Chicago, but it can still be difficult to access for refugees and asylum seekers based on administrative and bureaucratic hurdles.

Housing costs also rose sharply in Vienna as well in recent years making affordability the key challenge. Due to limited access to the housing market, refugees often have no choice but to live in very expensive housing according to Key Informants from academia, government, and NGOs as well as refugees themselves in FGD sessions. Utility costs were particularly challenging, as

¹⁶² Chicago, Ill., Exec. Order 2022-1 (Feb. 2, 2022).

¹⁶³ See CESCR General Comment 4, *supra* note 44.

¹⁶⁴ See Benjamin O'Donnell, “Chicago’s average rent rises to \$2,200, up 46% in 10 years,” *Illinois Policy website* (15 Aug. 2024), available at <https://www.illinoispolicy.org/chicagos-average-rent-rises-to-2200-up-46-in-10-years/> [<https://perma.cc/Y6AL-9Y9E>]; and Justin Kadi, “Vienna has been declared a renters’ utopia – here’s why,” *The Guardian website* (10 Jul. 2025), available at <https://www.theguardian.com/commentisfree/2025/jul/10/housing-crisis-in-europe-vienna-renters-social-housing> [<https://perma.cc/7VFJ-A697>].

sudden assessments of annual utility bills and unclear charges frequently caused financial panic for refugees and asylum seekers in Vienna. Price hikes following the start of the Ukraine war have doubled some energy costs, making even municipal and cooperative housing unaffordable for refugees and asylum seekers.

Research Story 2: (Afghan Refugee in Vienna)

“[My wife] had an accident at work where her back and legs were injured and she now has problems going up the stairs. That's why we are looking for a [ground floor] apartment where we can live and the apartment is only 43 m² and we pay € 780 in rent. There's not enough space. We couldn't put in a bed and she has to sleep on the floor with her injury because we don't have enough space for a bed.”

The Afghan refugee who shared Research Story 2 as part of an FGD in Vienna was elderly and had family of four people. While his wife had lived in Vienna over two years, thus qualifying for municipal housing individually, the whole family had not been in Vienna that long, so it was not possible for them to utilize public housing as a family. This family found an apartment in the private rental market, but it was expensive and insufficient, as the story shows.

Situations similar to the one reflected in Research Story 2 were often faced by refugees and asylum seekers in Vienna, according to FGD participants. Shared apartments with reduced habitability and availability of infrastructure were noted by several participants. For instance, an Afghan youth who participated in an FGD stated, “you can't find a private apartment, you have to live in a shared apartment. You are forced to live in such places, and most of the time there are lots of people and it's a little apartment.” This resulted for FGD participants like this one frequently leaving apartments and trying to find new accommodations, with the cycle continually repeating itself.

Refugees and asylum seekers in Chicago faced even higher rents than in Vienna and had much less access to governmental housing support. Although they generally qualified for public housing in Chicago or subsidized apartments through Section 8, neither option is actually available to refugees due to a lack of units and a multi-year waiting list for support. Asylum seekers did not have even the possibility for governmental housing support because they did not meet the statutory qualifications for such support.¹⁶⁵ With the passage of budget legislation in July 2025 after the data collection for this research was complete, refugees' access to governmental support in housing has been further restricted or eliminated, which will only make the situation more difficult.¹⁶⁶

In Chicago, access to services and an adequate location for housing were problems for refugees without access to an automobile. In an FGD session for Afghan women in Chicago, several participants explained that they have to live in a neighborhood with public transit service because otherwise they would not be able to work or eat easily.

“*Facilitator*: How easy is it for you to move if you wanted to?”

¹⁶⁵ See, e.g., Housing and Community Development Act of 1980, *supra* note 72 (stating that asylum seekers do not qualify for Section 8 support). See generally Maggie McCarty and Abigail F. Kolker, “Noncitizen Eligibility for Federal Housing Programs,” Congressional Research Service (23 Jan. 2023), available at <https://sgp.fas.org/crs/misc/R46462.pdf> [<https://perma.cc/4AEV-EVPZ>] (setting forth a detailed explanation of refugee and asylum seeker eligibility for housing support in the U.S.).

¹⁶⁶ See Frommer, *supra* note 160.

“Participant 1: We don’t have a car and must walk a long distance to shop. We need a bus card. When we use Uber, it costs \$70 round trip, which is very expensive.

“Participant 2: We don’t know how to drive. This is a big problem.

“Participant 3: We have to buy a car ourselves. The government doesn’t help.”

Other FGD participants explained the bureaucratic difficulties in obtaining housing benefits, even when they would otherwise qualify. “I applied for municipal housing once, but it was turned down... they asked for other documents, I threw everything together and brought it there. That’s all I could do and then I never went back.” This was relayed by elderly male FGD participant from Afghanistan who was in a financially precarious private housing situation at the time of data collection. Such examples showed the lack of existing case management and knowledge of governmental requirements, especially amongst older refugees.

Vulnerable groups: Similar experiences for elderly people, people with disabilities (PWDs), and youth were noted throughout the data collection regarding housing issues. These refugees and asylum seekers were more vulnerable and many times in very insecure housing situations, even compared to other refugees and asylum seekers. This was especially true for housing as compared to food and was largely due to their difficulty in accessing existing services and benefits. Administrative and bureaucratic challenges created a significant portion of the difficulty in accessing services and benefits.

Numerous FGD participants in Vienna relayed that Afghan families with many children, elderly people, and young adults were especially impacted by overcrowding and inadequate housing spaces. These conditions were frequently accompanied by weak security of tenure, high potential of conflicts with neighbors, and negative effects on health, well-being, and the school success of children. Refugee youths without private spaces in their housing were pushed into public spaces, where they were socially stigmatized by other segments of society. While youth services existed, vulnerable youth often lacked access to them said NGO Key Informants, leaving them in unsupervised spaces and worsening their social exclusion.

Housing as part of Chicago resettlement: A situation where certain refugees received additional housing support was when resettled refugees get cash and casework assistance as part of their initial arrival in the U.S. This is only available as part of the resettlement process,¹⁶⁷ so it is not accessible for migrants with legal protection who obtained their statuses using different mechanisms. Thus, there was no financial or integration support of this type provided for TPS or SIV holders, or for refugees approved through different programs. Even this resettlement housing support was quite limited, however. Resettlement NGOs tend to provide three to four months of rental support for newly-arriving resettled refugees according to several Key Informants in Chicago. One KII participant noted, however, that the total amount of monetary support received is \$1,625 per refugee, which is a one-time grant to cover not just housing but all of their initial needs about resettlement in the U.S. This is not typically sufficient to cover a refugee’s needs, even for the 30- to 90-day period it is intended to support them. It must also be noted that with

¹⁶⁷ See HHS ORR Fact Sheet, *supra* note 53.

the extensive curtailment of the refugee resettlement program by the current presidential administration, this sort of support is even less available at present.¹⁶⁸

Impact of movement to Vienna: Another issue with housing costs was shared by significant number of FGD participants in Vienna who had previously lived outside of the Austrian capital. Due to the residential assignment system of the federal government, many refugees and asylum seekers live in other Austrian federal states after receiving their initial asylum seeker status and moving out of a BBU-managed reception facility, which must be done after four months.¹⁶⁹ However, as Vienna housed more than double (211%) of its assigned level of asylum seekers, refugees and asylum seekers have been drawn towards Vienna according to academic and NGO Key Informants. In KIIIs, several reasons for this movement were suggested: (1) opportunities for work and education; (2) good public transport infrastructure; (3) health and specialized services provided in refugees' native language; (4) strong social networks and communities; (5) perceived safety and stability for refugees as compared to insecurity and discomfort many refugees felt in rural areas; and (6) access to activities leading to better lifestyle. These circumstances were exacerbated as other Austrian federal states provided fewer essential integration services than did Vienna, said the Key Informants. Vienna's recent population increase, of which refugees and asylum seekers were a part, burdened the city's education, health, and social systems, and fueled political friction.

FGD participants noted the considerable administrative burdens in maintaining housing assistance upon moving to Vienna. These were purposeful from the Austrian government as it sought to integrate refugees and asylum seekers in places other than Vienna. One FGD participant describing a refugee trying to move to Vienna said, "with all the waiting time and re-registration, which takes two to three months, when [a refugee] gets no social financial support. Private apartments are very expensive and municipal apartments are not available to them, because they have not lived long enough in Vienna." This places burdens on refugees' and asylum seekers' freedom of movement, and implicates negatively the accessibility and location pillars of the rights to adequate housing.

Finding 5: It was very difficult for refugees and asylum seekers without credit or work histories to find adequate housing, which was amplified by discrimination.

Despite purporting to protect refugees and asylum seekers in the state from housing discrimination, the Illinois Immigrant Tenant Protection Act expressly permits landlords to request "information or documentation necessary to determine or verify the financial qualifications of a prospective tenant."¹⁷⁰ For this reason, that law does nothing to curtail one of the most significant problems for refugees trying to find adequate housing in Chicago: that landlords frequently rejected prospective refugee tenants out of hand for a lack of "financial qualifications". While many of the landlords' concerns involved the ability of refugees to pay their rent, some were likely also pretextual and based on discrimination or animus. An NGO Key Informant in Chicago who worked on housing for refugees explained that it was very difficult "to convince landlords and management

¹⁶⁸ Church World Service (CWS), "Daily State of Play: Trump's Indefinite Refugee Ban and Funding Halt," *blog* (17 July 2025), available at <https://cwsglobal.org/blog/daily-state-of-play-trumps-indefinite-refugee-ban-and-funding-halt/> [<https://perma.cc/7PMR-8AJ9>].

¹⁶⁹ See BASIC WELFARE AGREEMENT PURSUANT TO ART. 15A OF THE CONSTITUTION, *supra* note 133, §§ 1(4), 4(1).

¹⁷⁰ Immigrant Tenant Protection Act, *supra* note 89, at § 10(b)

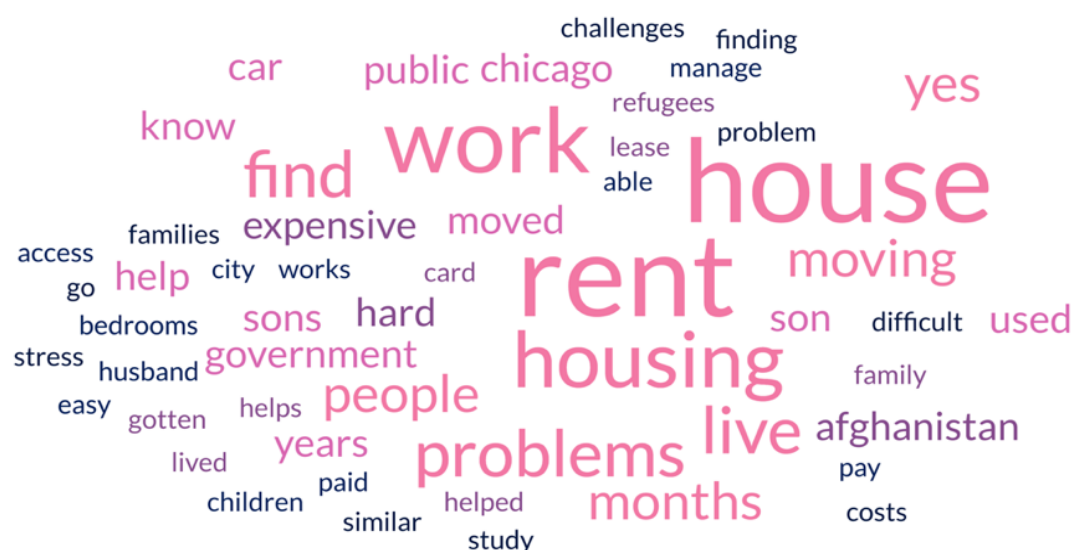
groups of apartments that are somehow affordable to take a chance with people who don't have any credit history, at least not a long credit history.”

Shannon Ericson of the Jewish Child and Family Services (JCFS), who has worked on these issues as a caseworker and manager for years put the problem succinctly: “Technically every landlord in the city could decline us. They are legally within their rights to decline housing to every single one of our clients.” Especially in competitive housing markets, like the one found in Chicago at present, this state of the law made it far more difficult for refugees to find adequate housing in convenient locations. It also placed refugees at risk for rent gouging as they had limited options.

Refugees, especially Afghan men and visibly religious women, faced informal exclusion in Vienna based on the qualitative data collected. Structural racism, income status disparities, and national origin played key roles in housing difficulties for refugees and asylum seekers said an academic Key Informant. Many FGD participants in Vienna saw no possibility in competing with non-refugees in the private housing market due to racism and discrimination. With these perceived limited opportunities in the private housing market, refugees were left highly vulnerable to the types of fraud and exploitation that are described in more detail in the discussion of the next two Findings.

Additionally, in the Chicago context, the aggressive immigration enforcement actions being conducted by U.S. federal government have started, as of July 2025, to include the issuance of administrative subpoenas to landlords “demanding that landlords turn over their tenants’ personal information including leases, rental applications, and forwarding addresses.”¹⁷¹ While this occurred after the conclusion of data collection by the PRAXIS project, and therefore was not addressed in any of the KIIs or FGDs, it is possible that such acts by U.S. federal immigration agencies may serve as a further deterrent for landlords to rent apartments to refugees and asylum seekers.

Figure 3:
Chicago Housing Word Cloud from FGD with Women



¹⁷¹ CWS, *supra* note 168.

Finding 6: Limited support for refugees to “know your (tenant) rights”.

Finding 7: Legal security of tenure was precarious for many refugees and asylum seekers.

Some communities, service providers, and local government entities have rolled out “know your rights” resources for refugees and asylum seekers. These “know your rights” interventions have focused on the human rights of all migrants when interacting with law enforcement or immigration officers, with the goal to avoid illegal detention and deportation.¹⁷² Very little such support exists for refugees and asylum seekers to know their rights as tenants and regarding adequate housing generally, however. The research showed that there was real lack of knowledge amongst refugees and asylum seekers on housing issues that was not addressed by services provided.

Most FGD participants relied on anecdotal and second-hand information when making their housing decisions. They also had to use various creative methods to convince landlords to rent to them, such as described in Research Story 3.

Research Story 3: (Syrian Refugee in Vienna)

“On Facebook, I entered a group called *WG Zimmer* [(Apartment Share)]. I searched and I found that every room has its own rental contact. When I asked them if I could live there, the woman who owns it asked me, ‘what do you do in general?’ I told them I come from [another Austrian state] Tyrol and I am looking for a job. I showed them a video on YouTube when back then in Tyrol I was interviewed with the [Austrian public broadcaster] ORF. It shows that I was working and I am well-integrated. Then the landlord accepted me.”

Many refugees in Vienna lived in sublet or informal housing without rental contracts, a situation that left them vulnerable to exploitation, rapid eviction, and legal uncertainty. This legal limbo often persisted for years according to FGD participants and NGO Key Informants until stable – often municipal – housing was secured. Due to lack of alternatives, refugees and asylum seekers were highly vulnerable to fraud and overcrowding facilitated by irregular tenancy agreements, often facing scams involving illegal commissions, cash-only payments without contracts, and false rental promises. This state of affairs is shown by Research Story 4, which demonstrates how without additional support refugees could be exploited and their right to adequate housing undermined.

Research Story 4: (Afghan Refugee in Vienna)

“I found an apartment [in Vienna] through an Afghan acquaintance. My last apartment in Neunkirchen [a small city south of Vienna] had already expired. So, we had to move out, then we found the [Vienna] apartment under stress and had to pay an € 3,500 commission.”

Although it is unclear what sort of commission fee the FGD participant in Research Story 4 had paid, it is clear that there is no fee that he should have paid as a new renter, especially not such

¹⁷² See, e.g., City of Chicago Office of Immigrant, Migrant, and Refugee Rights, “Know Your Rights & Resources: Upholding Justice and Rights for Every Chicagoan,” (23 Jan. 2025), available at <https://www.chicago.gov/content/dam/city/depts/mayor/Office%20of%20New%20Americans/PDFs/ShortenedResourceGuide-English.pdf> [<https://perma.cc/BQ24-NRXE>].

a large amount. Most fees for new tenants have been eliminated in Austria,¹⁷³ and a security deposit should have been equivalent to one month's rent, which would have been less money than what this refugee paid.

While NGOs and government agencies have provided resource guides relating to housing rights, such as the toolkit that explains how to access CBRAP support in Illinois,¹⁷⁴ it was clear from the FGDs that most refugees and asylum seekers were not aware of these publications. Additionally, FGD participants indicate that they are not aware of existing housing support programs for which they may be eligible, as the exchange below from a Chicago FGD with Afghan women showed:

“Facilitator: There are government programs called Section 8 and Public Housing that can help refugees with housing. Are you aware of these programs? If yes, why haven't you used them?

“Participant 1: I don't know.

“Participant 2: I don't know.”

c. Related to Service Providers

Finding 8: The non-governmental sector in both Chicago and Vienna deliver the vast majority of services to refugees and asylum seekers well, but are constrained by funding limitations and lack of capacity to plan strategically.

Finding 9: Fractured service provision by program and agency decreases effectiveness.

While most of the benefits received by refugees were derived from government, they were facilitated and implemented by the non-profit sector. NGOs, CSOs, and other non-governmental entities, like unincorporated community groups and religious organizations, assisted particularly strongly with housing, often offering partial rent or subleases, to facilitate an easier entry into the private rental markets of Chicago and Vienna. They also liaised with landlords or rental agencies to find housing for refugees and asylum seekers and convince these private sector actors to “take a chance” on renting to forced migrants. Caseworkers handled heavy caseloads, but often found ways to obtain support for their refugee clients, particularly through referral to other service providers or assisting in obtaining governmental benefits. While support around food was less robust, NGOs and CSOs offered support to refugees and asylum seekers with basic food needs, and several NGOs observed as part of this research operated food pantries that targeted refugees and asylum seekers.

Across the qualitative data collection, distinctions between non-governmental organizations by size in both Chicago and Vienna became clear. Namely, bigger NGOs have reach and expertise, but were usually dependent on and/or constrained by government funding, as well as being mostly projectized in their funding. Smaller and grassroots organizations, including most faith-based ones, were usually creative, independent, and filled gaps; but these smaller organizations were often isolated from and not always well-coordinated with refugee support providers in either city.

A significant issue for NGO and CSO service provision to refugees and asylum seekers is that support was fractured across a multiplicity of providers in Chicago and Vienna. This is less the fault of the organizations themselves and more from how governmental funders in both countries

¹⁷³ Tirol Real Estate, “Tenants no longer pay estate agent commission since July 2023,” *blog* (3 Jul. 2023), available at <https://www.tirolrealestate.com/en/blog/detail/tenants-will-pay-no-broker-commission-from-2023> [https://perma.cc/FG84-ZAAP].

¹⁷⁴ See Illinois Court-Based Rental Assistance Program Toolkit, *supra* note 98.

structured the refugee support systems. Public benefits for forced migrants were purposefully diffused and decentralized, which enabled a degree of innovation and contextualization but also decreased service provision effectiveness. This was reflected in the many comments heard in FGDs in both Chicago and Vienna regarding difficulties identifying and accessing food and housing services due to multiple, confusing options.

Finding 10: Coordination by the government is generally weak, although stronger in certain, specific areas like with refugee resettlement agencies.

Despite the need for coordination created by the fractured system of service and benefits provision for refugees and asylum seekers in Vienna and Chicago, governments did not mandate or organize coordination mechanisms covering all of the relevant actors, including for refugee housing and food rights sub-sectors. A major exception was in the refugee resettlement due to U.S. federal grant conditions for resettlement agencies and requirements set forth in U.S. federal law.¹⁷⁵ These federal coordination requirements were further strengthened in Illinois as the state government designated the Jewish Federation of Chicago/Jewish United Fund to run the coordination mechanisms for resettlement agencies across the state, including Chicago. According to multiple resettlement sub-sector Key Informants, the Jewish Federation operates multiple spaces for coordination, including an Executive Council of HHS ORR-funded implementers to discuss high-level matters every other month and several Communities of Practice that meet on a quarterly basis for, according to Alison Bell, Assistant Vice President, Refugee Services for the Jewish Federation, “technical assistance, for peer learning, and to help ensure that the team at the Jewish Federation is hearing directly from those implementing the programs in Illinois.” Key Informants working on resettlement universally agreed that coordination of resettlement agencies was well-attended and resulted in fulsome information sharing leading to more effective service delivery to resettled refugees.

The effectiveness of the resettlement coordination demonstrates the utility of government-directed coordination. It also highlights the impact of the absence of that government direction in other parts of the refugee support sector. Despite having the convening authority to bring various agencies together, no government entity at any level organized or led a broad-based coordination mechanism related to refugees or asylum seekers. There were government supported coordination initiatives in the past based on KIIs, such as with the City of Chicago’s response to migrants being bused to the city from Texas in 2022-23, but those have largely wound down at the time of the research.

There were instances in which government financial support was used for coordination, but the government did not run or participate in the coordination mechanisms. For example, Illinois Coalition for Immigrant and Refugee Rights (ICIRR) had quarterly meetings for their programmatic sub-grantees based on KIIs, which was supported by State of Illinois funding, but was not organized or participated in by the state government. There exist a variety of non-governmental coordination mechanisms in both Chicago and Vienna, particularly the Refugee Action Network (RAN) in Chicago.¹⁷⁶ The work that RAN and other non-government entities did in coordination served to bring together willing partners to discuss and fill gaps to the extent possible.

¹⁷⁵ See HHS ORR Fact Sheet, *supra* note 53, *passim*.

¹⁷⁶ See RAN, “About Us,” *website* (2023), available at <https://www.refugeeactionnetwork.org/about> [<https://perma.cc/3WW3-D55X>]. Due to scheduling and time limitations, no representative of RAN was part of the qualitative data collection, although some Key Informants shared information about its work.

The lack of a coordinating function led by government for refugee support in Vienna and Chicago is very different than what occurs in other contexts of service provision. This can be seen clearly in the international humanitarian response cluster system approach, which is led by United Nations agencies under the auspices of the U.N. and frequently co-chaired with national governments and NGOs.¹⁷⁷ While not always a well-functioning system, clusters usually serve to enhance accountability, coordination, and effectiveness in disaster response internationally, and they would not be possible without the authority of governmental structures and funding. Without this type of governmental leadership, refugee support systems will likely remain diffuse and less effective than they could be.

d. Human Rights as a Lens for Refugee Food and Housing



Figure 5: GCFD T-Shirt

Finding 11: Food and housing increasingly understood using human rights language.

Historically, economic, social, and cultural rights such as the rights to adequate housing and adequate food have not been well-understood in domestic contexts, as discussed in Section 5(a)(i) above. The U.S. federal government has not ratified the ICESCR, as mentioned, and the domestic uses of the rights in the covenant have not been often recognized.¹⁷⁸ Nonetheless, the understanding of adequate housing and adequate food as human rights is increasing. GCFD, for one, uses food as a human right on its merchandise that it sells to raise funds, which can be seen

in the GCFD t-shirt featured in Figure 5.¹⁷⁹ This growing understanding of housing and food rights would enable the use of the right to adequate housing and the right to adequate food as a framework for understanding housing and food issues in refugee support.

Describing the use of the right to adequate housing as a structure to understand housing for refugees and asylum seekers, one academic Key Informant said: “It’s a useful framing for a discussion about what policies are needed.” The 1969 Vienna Convention on the Law of Treaties (VCLT) provided additional support for the idea that the protection of the rights to adequate

¹⁷⁷ See UNHCR, “Cluster Approach,” *Emergency Handbook* (20 Nov. 2023), available at <https://emergency.unhcr.org/coordination-and-communication/cluster-system/cluster-approach> [https://perma.cc/7Q8D-J9K3].

¹⁷⁸ See Busby, *supra* note 31

¹⁷⁹ See GCFD, *supra* note 161.

housing and adequate food has broader applicability even in countries that have not ratified the ICESCR.¹⁸⁰

Scott Busby, a Key Informant who is a former Deputy Assistant Secretary of State in the Bureau of Democracy, Human Rights, and Labor (DRL), noted that “it is interesting that the US human rights movement has also evolved in its thinking” regarding economic, social, and cultural rights, as many NGOs have moved away from an outright rejection of working on those as human rights issues to focus instead on civil and political rights. NGOs are starting to see the right to adequate food and the right to adequate housing, among other economic and social rights, as important areas for protection and advocacy. Busby also said in his KII “that trajectory is a significant one in combination with the evolution of the U.S. government's own thinking on these issues.”

An academic Key Informant stated the options for municipalities in this way: “It's important for cities like Chicago to help create an understanding of the human rights framing as part of that moral and even regulatory discussion, because they can use it. Nothing stops them from being more human rights friendly than the national government.” Another practitioner Key Informant gave an example by pointing to how some U.S. cities sought to align their municipal policies with the Sustainable Development Goals (SDGs) as a way to improve development and sustainability, and as way to structure their engagement with human rights.¹⁸¹

¹⁸⁰ See Anthony Aust and Oliver Dörr, “Vienna Convention on the Law of Treaties (1969),” *encyclopedia entry*, Max Planck Encyclopedias of International Law [MPIL] (Mar. 2023), available at <https://opil.ouplaw.com/display/10.1093/law:epil/9780199231690/law-9780199231690-e1498> [<https://perma.cc/X93C-XBL3>], at 19-20.

¹⁸¹ See, e.g., Sarah E. Mendelson, “The ‘SDG Effect’: The emerging Pittsburgh platform to deliver the global goals locally,” *commentary* (30 Jan. 2020), available at <https://www.brookings.edu/articles/the-sdg-effect-the-emerging-pittsburgh-platform-to-deliver-the-global-goals-locally/> [<https://perma.cc/F2L8-5GL5>].

RECOMMENDATIONS

It is hoped that practitioners and policy-makers in Chicago and Vienna, as well those in other similarly-situated cities, will be able to benefit from the 10 Recommendations shared below, which grow from the Findings of the PRAXIS research. The Recommendations start with a general proposal and are followed in every case with specific suggested actions. These suggested actions are not fully fleshed out proposals ready for immediate implementation; rather, they build upon the research Findings with examples how they could be addressed and the rights to adequate food and adequate housing brought into closer alignment with international human rights law. Stakeholders will have to develop interventions appropriate to their contexts, and the Recommendations point to practical activities to be tried.

The researchers recognize that the political moment does not appear to support expansion of the protection of refugee human rights, and that the proposed Recommendations may seem unachievable. However, failure to challenge the status quo and educate the public on the right to adequate housing and the right to adequate food for refugees and asylum seekers is an abdication of responsibility. Political will needs to be created, and advocates of refugees and their human rights cannot wait until attitudes change on their own. The best way to widen the Overton Window is through advocacy and action to protect refugees' housing and food rights.¹⁸²

Strengthening protection of the right to adequate food

- **Recommendation 1: government, NGOs/CSOs, and refugee communities need to raise the salience of diverse, culturally-appropriate, and nutritious food.** For instance, government should make food benefits that emphasize and promote nutrition more readily accessible. For instance, as WIC is the primary U.S. program supporting nutritious food, WIC food item eligibility could be made less complicated or made more inclusive, as it is often unclear to users which foods are WIC-eligible and it only applies at present to families with children under five years old. WIC can also be practically connected to SNAP, like by enabling WIC usage on the Illinois Link card,¹⁸³ which would encourage the purchase healthy food.

Nutrition-directed incentives for other benefit programs, like SNAP's currently limited two-for-one credit for fruit and vegetables,¹⁸⁴ should be expanded or initiated through government action. Assessment of food pantries by the NGO operators for culturally-appropriate food should be undertaken, as should strategizing on how to reduce dependence on donations to increase availability of nutritious, healthy, and culturally appropriate food.

While the examples above reference the American context, both of these approaches apply equally to Vienna and Chicago. Increasing access to food cooperatives in Vienna for refugees by ensuring that GV and other benefits could be used there easily is one way that

¹⁸² See Mackinac Center for Public Policy, "The Overton Window," *website* (2019), available at <https://www.mackinac.org/OvertonWindow> [<https://perma.cc/V3JB-NRZU>] (explaining the Overton Window concept and its application).

¹⁸³ See IDHS, "Illinois Link Card," *website* (2023), available at <https://www.dhs.state.il.us/page.aspx?item=30371> [<https://perma.cc/PP8Y-GX3G>] (showing how the Link card is used with SNAP to purchase food but cannot be used for WIC).

¹⁸⁴ See Fair Food Network, "Double Up Food Bucks," *website* (2021), available at <https://doubleupamerica.org/> [<https://perma.cc/KJR5-RBDW>].

this Recommendation could increase affordability and refugees' access to diverse, culturally-appropriate, and nutritious food.

Capacity development, building upon the nutrition posters at food distribution sites that already exist in both countries, would be beneficial as well. This could include informing food pantry staff members about nutritious options and how to best highlight those foods in the pantry. Additionally, awareness-raising campaigns on the availability of diverse, culturally-appropriate, and nutritious food options directed at refugee communities should be conducted by civil society and government. See Findings 1-2.

- **Recommendation 2:** *government promulgation as well as NGO/CSO advocacy and programmatic creativity to administratively ease uptake of food benefit programs.* Laws and/or regulations should be amended in a variety of ways to make it easier to access food benefits programs. To create the conditions for such legal change, other stakeholders should increase their advocacy to promote administrative simplification, particularly those steps that could be done for little or no cost such as adding WIC to the Illinois Link card as previously mentioned. While most benefits in the U.S. and Austria are federally-funded, the practical implementation of those benefits is primarily left to the states, which have significant leeway to make application and use processes simpler. Amenable state governments, and based on their current administrations this should include Illinois and Vienna, can take a number of steps on their own to ease bureaucratic burdens for refugee benefits recipients. Close civil society partners of those state governments would have strong standing to advocate for these sorts of changes, especially those partners already implementing refugee programming on behalf of states.

Substantive legal changes at the federal levels will be difficult to achieve in the short term as both American and Austrian federal governments are actively moving the other direction by increasing burdens on refugee and asylum seeker benefit provision. Nevertheless, demonstrable factual evidence shows that more effective and efficient service provision is possible with some small changes to current law. For instance, refugees being resettled in the U.S. should be allowed to apply for SNAP and WIC while overseas so they can start using it immediately upon arrival in the U.S. Fraud and abuse due to such a change would be negligible considering the intensive engagement of refugees being resettled with government agencies, which could easily facilitate SNAP and WIC sign-up as part of the extensive paperwork already being done as part of the resettlement process. Another example of an administrative simplification in the U.S. context would be an exception that made refugees per se eligible for SNAP and WIC and automatically enroll them in those programs for their first two years as a recognized refugee regardless of their income or work status. As their eligibility would be tied to their refugee status, which could be readily confirmed, fraud or abuse would also be almost impossible, bureaucratic burdens on the recipients and the state would be substantially reduced, and the uptake of food benefits would be more easily accessed. So long as certain politicians demonize refugees and seek to punish them through punitive administrative schemes, these sorts of common-sense reforms will be impossible, but that does not obviate their efficacy.

In lieu of legal changes, NGOs and other service provider stakeholders could try to extend creative programs that seek to help refugees overcome administrative hurdles to receiving food support. Having specialized case workers for food and nutrition, similar to the specialized housing staff that some NGOs already have, would develop an in-house expertise on food issues inclusive of how to best navigate complex requirements to obtain food benefits. Recognizing the expense additional staff would involve, a food specialist could

be shared between several NGOs to reduce costs per NGO and expand the reach of the specialist. Sitting such a food specialist in a “one-stop shop” for refugee service provision shared between implementing agencies would be another way to share costs and benefits, as well as more efficiently provide services to refugees in one place. See Findings 1-2 and 4.

Strengthening protection of the right to adequate housing

- **Recommendation 3:** *government and NGO/CSO stakeholders in close collaboration with refugee communities develop a refugee and housing integration strategy.* In both Vienna and Chicago, strengthening refugees’ rights to adequate housing would benefit from a written strategy embraced by key stakeholders and developed through a participatory approach including the affected communities. Housing support for refugees and asylum seekers currently lacks such an overall plan to protecting their housing rights in each city that treats housing as a foundation for integration. Development of a housing integration strategy would inform refugees of what they could expect in terms of support to secure access to affordable, habitable, and well-located housing. It would additionally provide guidance to service providers as to the local government’s aims, as well as guide duty-bearers regarding their responsibilities towards refugees and housing. Proper planning should also make housing support less dependent on legal status and more consistent. A formal strategy would also give stakeholders with the opportunity to incorporate international human rights law analysis into the city’s planning by utilizing the pillars of the right to adequate housing in General Comments to the ICESCR: Legal Security of Tenure; Affordability; Habitability; Availability of Services, Materials, Facilities, and Infrastructure; Accessibility; Location; and Cultural Adequacy. The pillars of the right to adequate housing would thereby provide a framework for the strategy and a justification for the actions proposed therein.

Housing policy development needs to be participatory, involving refugees and asylum seekers in design and decision-making. Host communities also need to be included in the planning and implementation process for the strategy to work to undermine resentments and build solidarity between long-time residents and refugees. This inclusive approach will also highlight the needs of the host communities, which should be accounted for in the strategy, and which will also provide evidence for housing support within the host community more broadly. Participation of the impacted communities can take a number of different shapes and should include, at a minimum, well-publicized open meetings held conveniently in the community for feedback, smaller group planning workshops, site visits, and validation exercises also conducted in the community.

Strategic planning must not be only a statement of principles, but must include concrete steps to promote housing rights for refugees. This should encompass practical activities set forth in a detailed Action Plan with assigned focal points and responsible parties as well as a designated monitoring system that would measure ongoing progress. Community members could be included throughout this monitoring, with feedback mechanisms (such as dedicated websites, telephone hotlines, and the link) developed to enable community input.

A local strategic plan for refugee housing rights would not be able to fix all of the housing problems refugees face because of the larger issue of the lack of access to affordable housing that is felt across Vienna and Chicago. It would, however, serve to focus minds on the issue as well as identify areas where local administrations could act immediately and what would require interventions at the federal or state level. Recognizing the latter would

also enable local stakeholders to conduct directed, effective advocacy to promote the right to adequate housing for refugees. See Findings 3-7 and 11.

- **Recommendation 4: *government working with NGO/CSO stakeholders increase housing supply and housing subsidies.*** Housing availability and affordability is a problem for most people in Chicago and Vienna, not just refugees, which is driven by a general lack of societal and governmental commitment to providing adequate housing for all. Thus, this Recommendation has to be seen in that context, with local stakeholders taking whatever innovative steps are possible in such an environment to increase housing supply and subsidies, and to conduct assertive advocacy to change policy where innovation cannot address all needs. All of this should be done within the framework of the pillars of the right to adequate housing laid out in international human rights, particularly as more housing supply and housing subsidies would promote the Legal Security of Tenure; Affordability, and Accessibility for refugees and asylum seekers.

One specific way to address housing supply and subsidies for refugees that combines innovation and advocacy would be to seek to increase accessibility to subsidized housing options for refugees and asylum seekers, such as Section 8 in the U.S. and public municipal housing, which are currently limited in both cities. Vienna's public housing program (*Gemeindebau*) is celebrated globally as a best practice example for municipally-owned housing, but it remains difficult to access for refugees and more units overall will be needed as Vienna's population continues to grow. Thus, housing access could be improved through simplifying complicated application processes and bettering communication with refugees about their options, but absolute housing supply will have to be increased in Chicago and Vienna as well. Increasing housing supply would benefit the entire community, not just refugees, and would have to be done over the long-term. A public-private approach would be needed to, among other things, encourage new private construction and adaptive reuse of existing buildings for residential living; expand the number of units available under Section 8; build additional public housing; and amend zoning and planning rules to promote the development of housing, such as by permitting accessory units as of right citywide, removing housing density restrictions, and eliminating parking space requirements for new apartment complexes. These suggestions merely scratch the surface of what is possible to give an idea of the sorts of efforts that are required.

Other innovative solutions to increase housing supply will also be needed. One idea that some Key Informants mentioned was NGO-owned, dedicated transitional housing for refugees with full kitchens and multiple bedroom options with fixed terms of stay. Management should be independent of other NGO service provision to avoid conflicts of interest, and a one-stop shop for services could be on the ground floor of the housing. This would take significant funding and may be logistically complicated, but is another example of the types of approaches that should be considered. See Findings 3-8 and 11.

- **Recommendation 5: *government promulgation and NGO/CSO advocacy to prohibit considering a recognized refugee credit scores and disallowing “risk fees” or security deposits more than one month of rent.*** Refugees and asylum seekers face de facto discrimination in both Chicago and Vienna based on their legal status as they are frequently charged extra fees or landlords refuse to rent to them due to their limited work history in the country. Enforceable anti-discrimination provisions are needed to strengthen existing laws protecting refugee housing rights, like the Illinois Immigrant Tenant Protection Act, that apply to landlords to open the housing market more fully to refugees. Stopping landlords from considering of refugee credit scores in the Chicago context, perhaps for a limited period like

the refugee's first two years in the U.S. and extended initially to recognized refugees, is an example of the sort of legal protections that would more effectively combat pretextual discrimination against refugees. The restrictions in time and legal status covered would protect landlords by ensuring that the law was narrowly-tailored.

"Risk fees" and unreasonable security deposits also disproportionately impact refugee tenants in both Chicago and Vienna. These are a form of price gouging that should be banned in both cities. Also, requiring co-signing before renting to refugees should not be allowed as it is also unfairly used to discriminate against refugee families. Such laws should be personally enforceable by individual refugees or through class actions to encourage compliance among landlords. See Findings 3 and 5-6.

Simplify and streamline refugee housing and food assistance

- **Recommendation 6: government promulgation and NGO/CSO advocacy to generally reduce administrative and bureaucratic barriers for refugee food and housing support.** While mentioned specifically in previous Recommendations, access to refugee food and housing support must be simplified and rationalized across the board in both the Vienna and Chicago contexts. This speaks to the Accessibility pillars of both the right to adequate housing and the right to adequate food as described in international law. Even when food and housing benefits exist in law, too often that support does not reach the intended refugee beneficiaries due to complicated administrative and bureaucratic hurdles. Refugee and asylum seeker newcomers to Vienna and Chicago who frequently do not speak German or English to a high level and who typically do not understand the requirements of benefit programs, all of which impede access to food and housing support for those who qualify for those benefits.¹⁸⁵

There are too many different status types and distinctions, and they should be merged and streamlined. It is too difficult and complicated to apply for benefit programs and the documentation required is burdensome, especially for work and income requirements. Conditional support should be replaced, to the extent possible with direct subsidies and cash-based support, which work better to meet refugees' needs and have less administration costs. A comprehensive solution in this regard would require action at the federal levels in Austria and the U.S., as the vast majority of food and housing benefits are funded and authorized at the national level. This may seem wholly unachievable in the present political context when laws are being passed to restrict benefits for refugees and asylum seekers more and more, but the evidence argues for simplification, and refugee support stakeholders need to argue to reduce barriers not raise them particularly in the face of bad faith demagoguing about forced migrants by politicians.

At the state and local level, cooperative governmental actors and service providers can mitigate the impact of complex rules around food and housing benefits for refugees through targeted activities. As will be discussed in the next Recommendation, one-stop shops ease administrative burdens but enabling refugees to apply for different types of support in the same location and usually with assistance from NGOs. Along the same lines, increased

¹⁸⁵ Food and housing benefits are generally conditioned on legal status in the U.S. and Austria, with recognized refugees generally receiving more support than asylum seekers and citizens received more support than either, as discussed in the Legal Context section above. This Recommendation is focused not on the extent of particular benefits, but instead on the accessibility of the benefits available to the relevant individuals by law. The Accessibility pillars of the rights to adequate housing and adequate food under the ICESCR apply equally no matter the legal status involved.

casework assistance can help refugees access benefits, as can capacity development for refugees and asylum seekers as to what sort of assistance to which they are entitled and how to apply for them. See Findings 4, 9, and 11.

- **Recommendation 7:** *government support with NGO/CSO staffing and implementation to increase one-stop shops for refugee benefits staffed by multiple agencies.* Facilitating refugee and asylum seeker access to services includes placing support to apply and use those services available in the same location. This is already being done by a number of service providers according to the qualitative data collection – examples including, in Chicago, the Illinois Welcoming Centers supported by IDHS and, in Vienna, a city government center for all youths under 25, not only refugee youths – and this should be expanded to the extent possible with additional one-stop shops in both Vienna and Chicago.¹⁸⁶ In such aggregated locations, refugees would be able to apply, access, and troubleshoot issues with food and housing benefits more easily. This would encourage use of these benefits and help those in need receive necessary support. See Findings 8-10.

Improve coordination of service providers

- **Recommendation 8:** *government and service providers work together to establish inclusive, comprehensive coordination mechanisms for food and housing rights of refugees.* Local government, in close cooperation with implementers of refugee support programming, need to jointly develop appropriate coordination mechanisms for refugee food and housing rights. This need for better coordination is felt in both Chicago and Vienna, and municipal government-led coordination mechanisms are needed in both cities.

Such coordination mechanisms would need governmental buy-in and support as a convener, and ideally as co-leaders and co-chairs, to be effective bringing the various stakeholders together and convincing them that it would be beneficial to all to work together. In Chicago, this could be done, for example, through the office of the Deputy Mayor for Immigrant, Migrant, and Refugee Rights, which is well-placed to oversee such efforts, and could be integrated with existing Jewish Federation and RAN coordination groups. In Vienna, several city agencies could host such a group, such as the Municipal Department 35 for immigration and residence or the Municipal Department 40 covering social affairs, social law, and health law. Having one comprehensive coordination mechanism within the city for the refugee support sector, which includes different topical or practical sub-groups, would streamline and strengthen coordination, which would concomitantly strengthen the protection of refugee rights. See Findings 8-10.

Conduct supportive capacity development

- **Recommendation 9:** *NGOs and CSOs should develop and deliver capacity development for refugees and asylum seekers to facilitate their housing and food support.* Selected capacity development programming would enhance refugees' and asylum seekers' understanding of their housing and food rights, as well as the services and benefits to which they are entitled. Previous Recommendations discussed specific types of capacity development that could be done, including on nutrition generally and providing information

¹⁸⁶ See *supra* IDHS, note 106 (regarding Illinois Welcoming Centers); and Stadt Wien, "U25 unterstützt Jugendliche bei Arbeit, Bildung und Sozialem (U25 supports young people with work, education and social issues)," *website* (2025), available at <https://www.wien.gv.at/kontakte/ma40/u25-jugendunterstuetzung.html> [https://perma.cc/66BK-64N2].

on public benefits for which refugees qualify. These and other areas of specific need should be identified with the participation of refugee communities.

One example that came up several times during data collection was that refugees' digital literacy is low, which hampers their receipt of services, as they need to be accessed through online means, such as the ABE website (<https://abe.illinois.gov/access>) for refugees and asylum seekers in Chicago. This is difficult as many refugees, more prominently older ones, do not know how to use such services and often do not even have email addresses. Presently, according to Key Informants, enterprising caseworkers at NGOs sometimes take the initiative on their own to assist refugees to sign up for ABE, and this sort of assistance should be promoted institutionally and mainstreamed. Standard Operating Procedures (SOPs) for helping refugees and asylum seekers with digital literacy could be created and disseminated, such as through coordination mechanisms mentioned in the preceding Recommendation.

For nutrition capacity development, in-person training sessions could be held at food pantries immediately after food distribution, so at a time when numerous refugees would already be present. Such trainings could be utilized to, among other things, explain nutritious preparation using the sorts of foods received in the distribution. This would be useful as Key Informants indicated that many times refugees and asylum seekers did not understand how to use food obtained at a pantry because it was packaged differently than in their country of origin or not available there and unknown to them. See Findings 1-8.

- **Recommendation 10: government and NGOs/CSOs develop “know your housing rights” outreach and awareness-raising.** Awareness-raising and capacity development are conceptually different interventions: “Awareness-raising efforts aim to generate and stimulate sensitivity to [relevant] issues ..., while ... capacity building aims to strengthen people’s knowledge and skills to engage with [those issues].”¹⁸⁷ Therefore, both methods should be employed in complementary ways, and this distinction is useful in the refugee sector as refugees need their sensitivity to their housing rights raised in both Vienna and Chicago as a predicate to exercising those rights. Qualitative data collection showed that refugees did not even know which housing rights they had, so they never knew to use them. An example of this regards the Habitability pillar of the right to adequate house as defined in international law, as several FGD participants mentioned that utilities in their apartments did not work but they did not realize that landlords are required to repair fixtures in the residence to ensure access to utilities. What is more, landlord-tenant legal aid already exists, as do support programs for housing rights, like the CBRAP in Chicago, but refugees and asylum seekers often do not know about them or how to access them.

Thus, targeted awareness-raising activities, particularly outreach and campaigns in the relevant refugee communities of Chicago and Vienna, would serve to increase the protection of the right to adequate housing for them. This could use as a model the “know your rights” campaigns that already exist for refugees and asylum seekers related to their legal status and interactions with law enforcement. Posters and brochures in multiple languages could be located in areas frequented by refugees discussing housing rights and ways to access resources on housing. Caseworkers and other service providers should also have these materials ready to share. Community meetings can be held on the right to adequate housing,

¹⁸⁷ European Institute for Gender Equality, “Gender Equality in Academia and Research – GEAR tool, Training: awareness-raising and capacity building,” (2025), available at https://eige.europa.eu/gender-mainstreaming/toolkits/gear/training?language_content_entity=en [<https://perma.cc/CL47-Y8UJ>].

with service providers in attendance to share what sorts of assistance are available. A combination of approaches that are contextually-appropriate would expand the reach of any awareness-raising campaign. See Findings 5, 6 and 11.

CLOSING THOUGHTS

What is to be done by stakeholders in Vienna and Chicago to strengthen the protection of refugee food and housing rights? This question takes on added importance in a context where the politics in both Austria and the United States, indeed throughout many places across the world, seem to be moving inexorably towards restricting the human rights of refugees and asylum seekers, to the point of rejecting their humanity altogether.

Moreover, food and housing are a part of a larger refugee and asylum seeker benefits context that is vastly under-resourced and which includes health, legal aid, job support, language support, case management, as well as other social services. There are simply not enough resources for the needs and the situation is worsening – again, what to do in this context?

It is precisely within such a challenging context for human rights that sub-national jurisdictions can take the lead, and the Findings, Conclusions, and Recommendation of the PRAXIS research project in this Final Report aim to provide a road map for this approach for Chicago and Vienna. Illinois and Vienna are welcoming to refugees and asylum seekers compared to other American and Austrian states, respectively, and they both have existing state programs that strengthen refugee rights. Further, the local governments of the City of Chicago, Cook County, and Vienna (in its dual role as a municipality) offer additional services above the federally-provided minimum level and proudly proclaim that this welcome refugees and asylum seekers as New Chicagoans and Viennese. What is more, the voting publics in Chicago and Vienna largely support this inclusive, rights-respecting approach.

As argued in the recommendations section, advocates must work to open the Overton Window wider and not be content with defensive retrenchment. Vienna and Chicago are exactly the places – diverse, evidence-based, openminded – where this approach can work, where it must be taken forward. Understanding the relevant legal and policy frameworks, particularly guidance that using the international law of housing and food rights as set forth in ICESCR as a lens can provide, to find effective ways to work to strengthen those rights on the local level in Vienna and Chicago.

In his September 1996 letter responding to Pawkowicz, the FPÖ's Vienna leader who disparaged Chicago as dangerously full of immigrants, Mayor Richard Daley demanded an apology – and a recognition of all that migrants add to a city and a country. “Chicago, like all American cities, owes its personality and its strength to the people who came here from around the world. These people came to live, work and escape a dead past and find a living future.”¹⁸⁸ This is as true today as it was when Mayor Daley wrote it in 1996, we need to proclaim it as loudly as he did, and we must redouble our efforts to protect the rights of those to whom our cities – to whom Chicago and Vienna – owe their personality and strength.

¹⁸⁸ UPI, *supra* note 2.

ANNEXES

Annex A: List of KIs

<u>Name</u>	<u>Company</u>	<u>Title</u>
Aigner, Marius	Food Point	Chairperson
Alami, Freshta	Afghan community representative	-
Andrews, Abigail	University of California San Diego	Professor, Urban Studies and Planning; Director, Center for Comparative Immigration Studies
Atassi, Maya	Syrian Community Network	Executive Director
Bell, Alison	Jewish Federation of Chicago	Assistant Vice President, Refugee Services
Boehner, Nicole	UNHCR	Assistant Protection Officer
Busby, Scott	U.S. Department of State, Bureau of Democracy, Human Rights, and Labor (DRL)	Fmr. Deputy Assistant Secretary of State
Daschütz, Ella-Maria	Volkshilfe/Akompano	Location Manager
Del Toro, Jesús	City of Chicago, Mayor's Office of Immigrant, Migrant, and Refugee Rights	Director of Policy & Strategic Initiatives
Diaz, Dan	RefugeeOne	Manager, Adjustment Program
Ericson, Shannon	JCFS	HIAS Director
Fayez, Fazlulhaq	Forging Opportunities for Refugees in America (FORA)	Deputy Head, Family School Partnerships
Flores Guzmán, Idalia	Illinois Coalition for Immigrant and Refugee Rights (ICIRR)	Director of Programs Administration
Gasparini, Adriano	RefugeeOne	Manager, Housing Department
Gugerell, Christina	Caritas	Environmental Management & Project Officer
Howland, Todd	Vermont Law & Graduate School / UN Office of the High Commissioner for Human Rights (OHCHR)	Visiting Professor / Fmr. Chief of Branch, Development, Economic, Social Rights
Huster, Selin	Volkshilfe/Akompano	Head of men's counselling, team leader for social counselling
Jost, Elisabeth	FIAN Austria	Project Officer

Krenn, Christina	Tralalobe	Head Basic Care Facility House Josefstadt
Lopez, Karina	Illinois Department of Human Services (IDHS)	Associate Director, Office of Welcoming Centers for Refugee and Immigrant Services
Malekzadah, Farshad	Tralalobe	Administrative Assistant and fmr. client
Mautner, Connor	Chicago Refugee Coalition	Founder and Strategy Director
Plovovits, Martina	Fonds Social Vienna	Head, Department Assisted Living (Basic Provision & Homelessness Services)
Pytel, Dorothy	Hyde Park Refugee Project	Executive Director
Quraishi, Sima	Muslim Women Resource Center	Executive Director
Reckinger, Gilles	FH St. Pölten	Stiftungsprofessor für Migration, interne Grenzregime und Bürokratie
Reinprecht, Christoph	University of Vienna	Housing Researcher, member of Integration City Council
Riebe, Maren	Ute Bock Foundation	Head of Communication
Safi, Ali Ahmad	Vienna Institute for International Dialogue and Cooperation (VIDC)	Afghan Diaspora Researcher
Schaidinger, Susanne	Interface	Project Manager
Singh, Maryam	Migrant.at - Counseling Center for Migrants	Expert Citizenship, Member of the Equal Opportunities Council
Solier, Sabrina	Austrian Red Cross	Social Worker MOBEWO
Soto, Sendy	City of Chicago	Chief Homelessness Officer
Stanzl, Peter	City of Vienna (<i>Stadt Wien</i>), MA40	Social Planner, Head of Department reporting, strategy, communications
Sweitzer, Helen	RefugeeOne	Director of Resettlement
Temper, Shirin	Austrian Red Cross	Social Housing Management

Additionally, although not interviewed separately in a KII, Charlotte Long (DMC PIR), Ramya Ramanath (School of School of Public Service), and Marcos Corona (Rinn Law Library) from DePaul University; Alia Mnayer from FORA; Hope Wetlesen and Yanina Vysotska from World Relief Chicago; Nina Sedeño from the Latino Policy Institute; Ekram Hanna from Middle Eastern Immigrant and Refugee Alliance (MIRA); Lisa Jenschke and Claire Bentley from Hyde Park Refugee Project; and Anuj Nagpal from Apna Ghar all provided input and guidance incorporated into this Final Report as part of the Participatory Workshop that they all attended in person.

Annex B: List of FGDs Conducted

Aggregated, anonymized information on the participants the participated in the PRAXIS research project FGDs is below.

<u>Location (Site, if appropriate)</u>	<u>Participant Type</u>	<u>Number of Participants</u>
Chicago (Muslim Women Resource Center office)	Women, Afghan	12
Chicago (ICNA office)	Women, Afghan and Rohingya	28
Chicago (ICNA office)	Men, Afghan	10
Vienna (AKIS facility)	Men, Afghan	12
Vienna (AKIS facility)	Women, Afghan	7
Vienna	Men, Syrian	2
Vienna	Women, Afghan	10
Vienna	Women, Afghan	10