#### Testimony of Dan Steinberg, Director of the Mayor's Office of Operations, Before the Committee on Governmental Operations March 1, 2024

Good afternoon, Chair Restler and members of the Committee on Governmental Operations. My name is Dan Steinberg. I am Director of the Mayor's Office of Operations. I am joined today by Lauren Quinones, the First Deputy Director of the Mayor's Office of Operations, who oversees the preparation and publication of both the Preliminary Mayor's Management Report (or PMMR) and the Mayor's Management Report (or MMR). Thank you for the opportunity to testify before you today.

The MMR stands as a pioneering example of radical transparency and accountability since its origin and my office has taken a number of crucial steps to modernize the MMR in form and substance. In the wake of the fiscal crisis of the late 1970s, the city pledged to more scientifically manage its operations by deploying data. Instead of "management by crisis," the city would measure agency performance and proactively address issues that arise. It began as a pilot program run by the Fire and Highways Departments and evolved in July 1976 to "Management by Objectives," which for the first time compelled City managers to articulate and quantify their performance goals as a baseline for evaluation. In 1977, the MMR and PMMR were codified in the City Charter and have been published bi-annually ever since. The PMMR offers an early evaluation of City performance in the first four months of the fiscal year, while the MMR, released in September, provides analysis of the full fiscal year.

Each report details agency goals and performance in clear terms, allowing stakeholders to closely monitor government performance. The MMR and PMMR track approximately 2,200 performance indicators across 46 city agencies. Each agency provides explanations and context for their performance, documenting successes and accounting for shortfalls. No other city government comes close to this level of accountability to its constituents and itself.

This administration has aggressively worked to usher the PMMR and MMR into the 21<sup>st</sup> century through digital enhancements and new performance indicators. Last year we launched and codified the Dynamic Mayor's Management Report (or DMMR), a digital, interactive platform that allows users to compare indicators across agencies and time, with user-friendly data visualization for each indicator. Furthermore, the DMMR provides monthly updates for nearly 1,200 performance indicators, allowing all stakeholders to monitor City performance more closely and meaningfully.

The DMMR has greatly improved the usability of the agency performance data, making it easy to explore historical trends, compare indicators in through data visualizations, and download the data for their own research. In January 2023, Operations further increased access to the MMR data by publishing an expanded performance indicator dataset on the Open Data Portal. This dataset is updated monthly and synchronized with updates to the DMMR. Previously, the portal only contained static datasets for each individual publication, severely limiting longitudinal analysis.

More recently, the Mayor's Office of Operations made several accessibility-related improvements to the DMMR, including improved keyboard accessibility, the ability to translate the site's content into 8 languages other than English, and an accessibility statement page where the public can leave feedback. We will continue to improve the DMMR with new features, such as a data stories section that will highlight important data trends across agencies, showcasing how the public and other stakeholders can leverage the DMMR to conduct analysis.

Following the launch of the DMMR, our office held two trainings for City Council staff and another training for stakeholder organizations on how to utilize the platform. Our office would be happy to host additional trainings for Council staff to help you better service your constituents.

The Mayor's Office of Operations also works collaboratively with all stakeholders – inside and outside government – to improve the PMMR and MMR. For instance, the Mayor's Office of Operations recently institutionalized a process to consider, track, and implement new indicator recommendations from the city council. So far, this administration has added around 65 indicators recommended by the City Council, such as the number of newly constructed schools by the School Construction Authority the number of stop work orders issued by the Department of Buildings, the number of litter baskets serviced by the Department of Sanitation, the number of active and close investigations by the Department of Investigation, and the proportion of New Yorkers who have the management over their diabetes as reported by the Department of Health and Mental Hygiene, among many others.

Under the current administration, the Mayor's Office of Operations has also proactively added customer-centric indicators to better track how the city serves its residents. There are over 600 indicators in the MMR considered customer-centric, with nearly 150 added over the past several reporting cycles. Recent additions include the average time it takes the Department of Transportation to repair a pothole, the proportion of rate complaints addressed by the New York City Housing Authority (NYCHA) within two days, and the median time turnaround for DNA analysis on gun crime cases by the Office Chief Medical Examiner.

The Mayor's Office of Operations continuously meets with our agency partners to reassess the applicability, transparency, and accuracy of the indicators within their MMR chapters. Our Office has led agencies through a guided self-review process to realign MMR chapters with agency missions and services; revising where needed goals, services, and indicators, and updating performance targets. This effort has yielded a net of 7 of new agency service areas, over 20 new agency goals, and over 200 new MMR indicators.

The Mayor's Office of Operations also continues to take steps to improve the quality of the reports. This includes recently ensuring consistency in the formatting and clarity of indicator names and establishing a more regular and prompted revisiting of program targets. Ahead of the fiscal 2024 MMR, we will be ensuring indicator definitions have more depth and clarity in support of the public's understanding of what is being measured.

One of the central aims of the MMR is to increase transparency into how local government functions, and that includes showing inequities where they exist. Operations continues to expand the universe of indicators that can be disaggregated by relevant geography, such as precincts,

school districts and community boards. In partnership with other Mayoral units, we aim to expand the disaggregation of performance data, geographically and demographically, to better understand the inequities in services and outcomes that exist across constituencies in this city and their neighborhoods they live in. There are over 30 indicators labeled as equity indicators in the MMR, indicating that they are disaggregated and reported in the city's annual Social Indicators and Equity Report, which lives online as EquityNYC. Additionally, each agency's MMR chapter includes a description of how their agencies focus on advancing equity through their work.

While the PMMR and MMR are each published annually, the administration heavily relies upon performance data as a management tool year-round and continues to establish internal systems of results-based accountability. The mayor is a strong proponent of active performance measurement and management, and the Mayor's Office of Operations has a series of monthly meetings with City Hall leadership focused on agency performance issues. In recognition of these systems and processes, New York City was recently awarded a platinum designation by What Works Cities, making us one of three cities in the world to achieve this high a rank for data-driven management practices.

However, our principal, charter mandated deliverable, is the MMR and PMMR. These reports require a lot of work and attention across all agencies involved. The process to produce themes often stretches over several months after the close of a particular reporting period. The Mayor's Office of Operations oversees a detailed schedule with many steps that include finalizing any changes, ensuring timely complete submission of data, drafting, and editing narratives to accompany the performance metrics, updating targets as needed, and facilitating internal reviews and approvals.

Through the MMR and PMMR, for nearly 50 years, the Mayor's Office of Operations has strived to promote transparency and accountability regarding the performance of New York City agencies. My Office will continue to steward this responsibility and appreciates its partnership with the New York City Council to ensure these reports are the most comprehensive insight into the quality and level of service delivery. We thank you for calling today's hearing and look forward to a sustained dialogue with the City Council focused on what we measure, what we're missing, and how performance data can be deployed to strengthen accountability and deepen our democracy.



### TESTIMONY OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS TO THE NEW YORK CITY COUNCIL COMMITTEE ON GOVERNMENT OPERATIONS, STATE AND FEDERAL LEGISLATION

Good morning,

My name is Jumaane D. Williams, and I am the Public Advocate for the City of New York. I thank Chair Restler and the members of the Committee on Government Operations, State and Federal Legislation for holding this hearing today.

The recent Mayor's Management Report is cause for concern. According to recent reporting from Robin Hood and Columbia University's Center on Poverty and Social Policy, over half of New York City – 56% of the population lives in poverty. When broken down demographically, the disparity is stark with Black, Latino and Asian New Yorkers twice as likely to live in poverty.<sup>1</sup> Additionally, the report found that one in four children in New York City live in poverty, a sharp reversal from 2021 when expansion of the federal child tax credit program cut child poverty rates by 30%.<sup>2</sup>

This reality makes the slow processing of cash assistance and SNAP applications all the more poignant and shameful. In the first four months of Fiscal Year (FY) 2024, timely processing of cash assistance was down nearly 41% points compared to the same period in FY 2023.<sup>3</sup> Processing of SNAP benefits remained relatively stable between July and October at a rate of 41.6% but that figure too is a decline from the previous year's rate of 60.1%.<sup>4</sup> Furthermore, application denials have also doubled.

The ongoing impact of COVID-19 cannot be overstated. But instead of easing burdens, this administration has added layers of upheaval to the lives of daily New Yorkers - from abandoning plans for a 3-K universal program to pursuing dangerous and debilitating cuts to social services.

<sup>&</sup>lt;sup>1</sup> Chen, Stefanos. "Poverty Has Soared in New York, With Children Bearing the Brunt." *New York Times.* Feb 2024. <u>https://www.nytimes.com/2024/02/21/nyregion/nyc-poverty.html</u> <sup>2</sup> Ibid.

<sup>&</sup>lt;sup>3</sup> Donaldson, Sahalie. "Report: New Yorkers are waiting longer for cash assistance". *City and State*. Jan 2024. <u>cityandstateny.com/policy/2024/01/report-new-yorkers-are-waiting-longer-cash-assistance/393775/</u> <sup>4</sup> Ibid.



While there's been some improvements with declining average wait times for fire alarm inspections and a drop in major crimes, the situation feels tenuous and dire for New Yorkers living under the combined impact of a housing crisis, an affordability crisis, and a child care crisis. These factors drive families and individuals from our city and the state at large. The Census Bureau estimates that since 2020, New York has lost 884,000 residents to other states, the largest net migration loss of any state in 2022.<sup>5</sup>

We must do better and I look forward to working with this new Council to deliver the support that New Yorkers so desperately need in these critical times. Thank you.

<sup>&</sup>lt;sup>5</sup> McMahon, E.J. "NY's population loss slowed a bit in '23, but loss still worst in U.S". *Empire Center*. https://www.empirecenter.org/publications/nys-post-pandemic-population-loss-slowed-a-bit-last-year-but-s till-worst-in-u-s/#:~:text=Since%202020%2C%20the%20Census%20Bureau.net%20outflow%20of%2033 8%2C371%20people.

# Testimony of Michael DeMarco President of Local 1455, DC 37 Before the Committee on Governmental Operations and State & Federal Legislation March 1, 2024

Good afternoon Chair Restler and fellow members of the Committee. My name is Michael DeMarco and I am President of Local 1455, DC 37. Local 1455 represents NYC traffic employees who work in the Department of Transportation in the following titles: City Parking Equipment Service Workers, Supervisor City Parking Equipment Service Workers, and Traffic Device Maintainers. Not only do my members ensure the safety of the public through maintaining traffic devices and street signage, but they are also a revenue generating title for the city. My members collect the revenue from parking meters (Muni Meters) and ensure the meters are functioning and working properly. This is a big source of income for the City of New York. Furthermore, my members who install and hang signs ensure that streets are labeled properly, which allows the traffic enforcement agents to properly issue tickets for parking violations.

Currently, my membership is down by at least 60 members and, as a result, this is impacting revenue collection by the city since they are in a revenue generating title category. I am sure the public is not complaining that there are lesser people to repair parking meters, but the city does suffer by not being able to collect revenue.

Furthermore, the city announced that they will begin to backfill vacant positions at a rate of 2 for 1, meaning for every two positions that are vacant, they will hire one person. Even though this is good news that the city is hiring again, this will impact revenue collection in the long term since they are hiring less people to fill the vacant positions.

We urge the administration to backfill <u>all</u> vacant positions in order for proper revenue collection to occur. The city is losing millions of dollars by not backfilling positions.

Thank you for holding this important hearing and I will take any questions you may have.

# THE LEGAL AID SOCIETY CIVIL

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#### Testimony of The Legal Aid Society Before the New York City Council Committee on Governmental Operations, State & Federal Legislation

**Oversight Hearing Examining the Preliminary Mayor's Management Report** 

March 1, 2024

Justice in Every Borough.

The Legal Aid Society appreciates this opportunity to submit testimony to the New York City Council Committee on Governmental Operations, State & Federal Legislation and Chair Restler for today's hearing examining the Preliminary Mayor's Management Report and the opportunity to testify.

#### Background

The Legal Aid Society (LAS), the nation's oldest and largest not-for-profit legal services organization, is more than a law firm for clients who cannot afford to pay for counsel. It is an indispensable component of the legal, social, and economic fabric of New York City – passionately advocating for low-income individuals and families across a variety of civil, criminal, and juvenile rights matters, while also fighting for legal reform.

In particular, our Government Benefits Practice assists the neediest New York City residents to obtain and maintain subsistence Cash Assistance and Supplemental Nutrition Assistance (or "SNAP") benefits issued by the Human Resources Administration ("HRA") as well as disability benefits issued by the Social Security Administration. Moreover, while our work spans meeting the urgent needs of individual clients for cash, food, health care, disability benefits, and housing benefits, we also engage in impact litigation, and conduct legislative and administrative advocacy at the city, state, and federal levels. In so doing, we aim to meet client needs, improve social welfare systems that prevent clients from reaching their goals of economic security, and defend against adverse changes in law and policy.

# The Crisis in Access Needs to Be Addressed

Relevant to today's hearing, The Legal Aid Society represents individual clients in all five boroughs whose Cash Assistance and SNAP benefits have been erroneously delayed, denied or terminated by HRA. Although HRA is charged by law with, among other things, the provision of these crucial subsistence benefits, by HRA's own admission, they are failing to meet their obligations. For instance, HRA is required by state and federal law to process cash assistance and SNAP applications within 30 days of the date the application is filed. This "timeliness" requirement exists in recognition of the urgent need of people seeking assistance. Nevertheless, vast numbers of the eligible, low-income New Yorkers we serve go without the SNAP and Cash Assistance benefits to which they are entitled because HRA fails to process applications and recertifications for SNAP and Cash Assistance within the mandated legal timeframes.

### **Application Processing Delays**

The Preliminary Mayor's Management Report ("MMR") documents the crisis. Concerning HRA's performance with respect to the goal to "provide access to cash assistance benefits for all eligible children and adults," HRA reports that its Cash Assistance timeliness rates were abysmal: in FY 23 were 28.8% and in FY24 14.3%. MMR, p.197. The agency is also failing to meet its goal to "provide access to Supplemental Nutrition Assistance Program benefits for all eligible children and adults." HRA's reported SNAP application timeliness rates are a failed 40% for FY23 and FY 24. MMR, p. 197. Put in terms of the life of New Yorkers, imagine a classroom of first grade students in Morrisania or Brownsville or the Lower East Side, in which 20 of them are eligible for CA/SNAP in FY 24: according to HRA's data, fewer than 3 of those 20 students' families would have had their applications for CA timely processed, and only 8 of them would have had their SNAP applications timely. Hunger and economic instability are equity issues that negatively impact health, educational outcomes, and housing. HRA's failures thus threaten the wellbeing of the neediest New York City residents and as such, our whole City.

Not only does the City fail to timely process applications, they are not responding to emergencies timely. Households who in a food emergency are entitled to Expedited SNAP benefits within seven days of applying, and those who have no cash to meet their basic needs, are eligible for same day Immediate Needs Grants. Between October 2022 and September 2023 HRA failed to timely process at least 40% of Expedited SNAP cases, meaning that nearly half of the households who applied and were eligible did not receive timely emergency benefits despite having a food emergency.<sup>1</sup> The Legal Aid Society and NYLAG returned to Court to enforce a 2005 judgment in *Reynolds v. Giuliani* to force HRA to make improvements in the timely provision of ESNAP benefits.<sup>2</sup>

# **Recertification Delays**

Application processing delays are not the only deficit in HRA's performance. Once an applicant for CA and SNAP is approved, they are required to "recertify" their eligibility for those benefits periodically. HRA is failing in its legal obligations to process these "recertifications" timely and without issuing wrongful denials. Notably, the Preliminary Mayor's Management Report does not include any information on HRA's timeliness rates for processing recertifications. In response, The Legal Aid Society along with NYLAG and Dechert LLP brought a lawsuit against HRA in January 2023.<sup>3</sup> As a result of that lawsuit, HRA is under a Court Order to eliminate its processing backlog for applications and recertifications for ongoing cash assistance and SNAP benefits. As required by this Court

<sup>&</sup>lt;sup>1</sup> See Motion for Contempt and Reply filed by Plaintiffs in *Reynolds, et al., v. Giuliani, et al.,* 98 Civ. 8877 (LJL).

<sup>&</sup>lt;sup>2</sup> See Motion for Contempt and Reply filed by Plaintiffs in Reynolds, et al. v. Giuliani, et al., 98 Civ. 8877 (LJL)

<sup>&</sup>lt;sup>3</sup> See Forest, et al., v. City of New York, et al., 23-cv-000745 (JHR).

Order, HRA has taken steps to eliminate its backlog of pending applications and recertifications, however, systemic problems persist.

For background, applying or recertifying for Cash Assistance and SNAP benefits is a multi-step process. A New Yorker must complete the appropriate form, submit documents, and be interviewed. They fill out the form online through HRA's portal on AccessHRA or go in person to the appropriate HRA Benefits Access or SNAP Center where they will still sit at a kiosk and complete the application online. They must then "upload" documents online or go in person to a Center where they will be directed to a scanner. Finally, interviews are conducted by telephone, whether or not a person appears in-person at a Center.

# Systemic Barriers Causing Application and Recertification Delays

There are ongoing systemic barriers to completing each of these steps which underlie HRA's failed performance.

# <u>Forms</u>

Many Households cannot complete the online application and recertification forms – HRA fails to provide real alternatives to ACCESS HRA. Even those who appear in person at HRA must apply online. Households are expected to use the online system, ACCESS HRA, to apply and recertify and are often impeded by the complex system and in many cases, even blocked by the ACCESS HRA system.

# Phone Interviews

Many households are denied or cut off because they cannot reach HRA by phone to participate in their mandatory phone interviews. In the Preliminary Mayor's Management Report (p.195), HRA offers that the "eligibility rates remained lower for Cash Assistance applicants partially because the "convenience" of the online portal "encouraged" more ineligible people to apply. This stunningingly rosy view of why HRA is denying more applications than before the pandemic is belied by the fact that where HRA has reduced a backlog in applications and recertifications there is a concomitant dramatic increase in applications that are denied due to failure to complete an eligibility interview.<sup>4</sup> The City Council passed a local law that requires HRA to publish quarterly data on CA and SNAP

<sup>&</sup>lt;sup>4</sup> See data produced pursuant to Local Laws 168 and 170 on the number of applications rejected during FY 24.1, <u>https://www.nyc.gov/assets/hra/downloads/pdf/news/ll168-170/fy24q1/2023-Jul-Sep-CA-4-Case-Rejections-By-Reject-Code-Age.pdf.</u>

cases. According to the local law data for the first quarter of FY 2024, the number of Cash Assistance Applications rejected for failure to keep or complete an interview was 43,000, a dramatic increase of 20,000 from the previous quarter.<sup>5</sup> Similarly 6,000 cases closed at recertification for failure to complete the recertification interview.<sup>6</sup>

For all cases, applicants must complete their mandatory interviews by calling HRA's On Demand line. Despite its name, the "On Demand" system involves long waits. Applicants regularly wait more than two and half hours on the line or for a return call ("call-back") from an HRA representative to complete the interview. In some instances, they never receive the return call. Participants are not warned about the long wait times, and HRA has provided no guidance to applicants about what happens if they do miss the call-back. If the household misses the call-back, they risk having their case erroneously denied or closed for failing to participate in a required phone interview.

### **Documents**

Many households are denied or cut off because the required documents they submit to HRA are lost or ignored and HRA fails to check its own records. Applicants are often required to submit the same documents multiple times and are repeatedly told that the agency does not have the documents they submitted.

# **Crucial Solutions**

The City Council is a critical partner in ensuring the success of the efforts The Legal Aid Society and our partners are pursuing in the courts. Through its oversight role, the Council can ensure that what will hopefully be improvements and/or failure of the agency to meets its mandated goals is transparent for all branches of government. We offer the specific suggestions below.

# 1. REPORT ON DELAYS AND STAFFING SHORTAGES

#### <u>Report on Application and Recertification Processing Delays for each month and</u> <u>Corrective Action Plans When They Fall Below 95% Timeliness.</u> HRA should be

# Justice in Every Borough.

<sup>&</sup>lt;sup>5</sup> Local Laws 168 and 170 require reports on instances in which Cash Assistance or Supplemental Nutrition Assistance Program benefits were terminated or denied. See data for Cases Rejected during FY 24.1, <u>https://www.nyc.gov/assets/hra/downloads/pdf/news/ll168-170/fy24q1/2023-Jul-Sep-CA-4-Case-Rejections-By-Reject-Code-Age.pdf</u>.

<sup>&</sup>lt;sup>6</sup> See data for Cases Closed during FY24.1, <u>https://www.nyc.gov/assets/hra/downloads/pdf/news/ll168-170/fy24q1/2023-Jul-Sep-CA-1-Cases-Closed-By-Closing-Code-Age.pdf</u>.

required to report and post on its website: the number of applications and recertifications for each month and the number and percentage decided within statutory deadline of 30 days; and those which are delayed beyond 30 days, 31-60 days, and 61-90 days. The data should also report on those eligible for expedited processing for SNAP benefits because of very low income and resources. HRA's timeliness in responding within the seven-day period required by law, and the timeliness for immediate needs grants which must be processed the same day are meant to address the dire needs of New Yorkers, but they must be timely to do so. HRA should also report on any projected delays for the next six months. Moreover, when timeliness for applications and recertifications falls below 95%, HRA should be required to publish a corrective action plan detailing how it will achieve timeliness within 90 days and publish interim progress reports.

- <u>Report on Staffing Shortages and How they will be Addressed to Eliminate</u> <u>Application and Recertification Backlogs.</u> HRA should also be required to report and post on its website: the agency's staffing numbers, staff retention, worker caseload ratios, average amount of time required to process applications and recertifications, and salary data. HRA should be required to specify the number of staff positions needed to eliminate current processing delays for applications and recertifications – and without negatively impacting other HRA benefits including Medicaid. HRA should detail its plans to address the staffing shortages identified.
- <u>Report all Program Waivers the Agency has Requested and Received from the</u> <u>Federal Government and OTDA</u>. HRA should be required to maintain and publish a waiver database listing all program waivers they have requested and received from the state and federal government. This will ensure that the operational rules for each benefit program are transparent.

# 2. MANDATE THAT THE AGENCY TO TAKE STEPS NEEDED TO ADDRESS SYSTEMIC PROBLEMS

Addressing systemic problems is essential to ensuring that SNAP and Cash Assistance households are able to submit applications and recertifications for these benefits. HRA should be required to:

• <u>Suspend HRA plans to resume work requirements until the application and</u> recertification delays are addressed.

Despite ongoing problems related to processing applications and recertifications, HRA has restarted mandatory work call-ins. This change will not only have a huge impact on HRA clients, it will increase HRA staff workload and decrease the agency's ability to address current staggering backlogs in application and recertification processing. HRA should suspend mandatory work requirements until it has resolved existing backlogs in application and recertifications.

# • Address HRA staffing shortages & Reform the Self-Service Model.

HRA must address staffing shortages which are preventing the agency from meeting legal deadlines. They must process applications and recertifications and provide benefits within the time frames mandated by law. Moreover, HRA should be required to report on the number of staff needed at each of its centers to provide in-person assistance to HRA clients, and HRA should be required to reform its current self-service model so that clients who appear in person are able to receive help from the agency during their visit.

# • Ensure Real-Time Help is Provided to Users of ACCESS HRA.

HRA operations are now premised on households using its online system – ACCESS HRA, to apply and recertify for benefits and to get information about their cases. HRA recently announced that it would be implementing an Access HRA Application Call Center that connects applicants with staff at a Community Based Organizations ("CBOs") who can assist them with Access HRA questions in real time. This promises to be a huge improvement and HRA should ensure the success of this new program by adequately funding and supporting the CBOs who will staff this program.

# Provide Realistic Alternatives to Applying Online.

HRA should be required to: a) make paper applications widely available; b) provide widespread information about the availability of phone applications and train HRA staff on this option and ensure adequate staffing to take phone applications; and c) create community partnerships with nonprofit organizations to help New Yorkers apply and recertify for benefits.

# • <u>Provide Guidance for Households on How to Best Use the On Demand Phone</u> <u>System.</u>

HRA should publish guidelines about wait times, how to use the call-back feature, and what to do if you miss a call-back to ensure that households can connect with an HRA worker to complete their interview.

# • Fix HRA Infoline/"One Number" Without Delay and Staff it Adequately.

HRA's central phone line system is a disaster. The system lacks adequate capacity to meet client needs. HRA replaced the old Infoline system with a single phone number that is not adequately staffed and is difficult to use. There is no escaping it because it is the ONLY number New Yorkers can use to get in touch with the agency. HRA has eliminated all of its other phone numbers. This means New Yorkers cannot get in touch with HRA by phone and cannot even complain about it because there is no separate complaint number to call. S sends New Yorkers to this Infoline/OneNumber if they want to complain about Infoline/OneNumber the agency. As COVID infection numbers surge again, New Yorkers must be able to contact HRA by phone now – to access benefits, avoid in-person visits to crowded HRA centers, and reduce the spread of the virus.

- Reform and audit its systems of verifying documents and provide real-time receipts. Many households are denied or cut off because the required documents they submit to HRA are lost or ignored and HRA fails to check its own records. HRA acknowledges that the agency is failing to timely index documents and that it does not provide receipts to those who submit documents at centers. HRA should be required to a) retrain staff to only require document submission after HRA has confirmed that it lacks the documents in its systems and that the document is indeed required; b) provide receipts for documents at the time they are submitted; and c) eliminate all backlogs in indexing documents -- in addition to posting application and recertification delays, the agency should be required to post each month the number of days the agency is behind in indexing documents.
- Seek waivers to speed processing and post the waivers requested and granted on <u>HRA's website</u>. HRA should seek waivers of federal and state rules for Cash Assistance and SNAP benefits to speed processing of applications and recertifications. Such waivers requested should include at a minimum, waiving the interview requirement wherever possible and extending certification periods. HRA should be required to post on its website all waivers requested along with responses to those waivers.

# 3. STOP KEEPING NEW YORKERS FROM REACHING HRA: INSTRUCT 311 TO TAKE INQUIRIES AND COMPLAINTS ABOUT HRA.

New Yorkers should be able to reach out to HRA to get information on their cases and request disability help. Currently, HRA instructs individuals on their website to contact the HRA Office of Constituent Services to do so. But the phone number posted is the same Infoline/One Number line that has long hold times and prevents clients from getting through to HRA. And 311 does not take HRA complaints – they refer callers to Infoline/One Number. HRA is effectively, hiding the complaint box. HRA should be required to provide an alternate phone number and the City should also require the 311 system to take requests for disability help as well as inquiries and complaints about HRA. All callers should be provided with a confirmation and tracking number to enable clients to track their calls and ensure that HRA resolves outstanding issues.

# **Conclusion**

We thank the Council for the opportunity to provide written testimony. We look forward to further collaboration to ensure that HRA eliminates backlogs and processing delays so that all New Yorkers are able to access the SNAP, Cash Assistance and Rental Arrears benefits to which they are lawfully entitled.

Respectfully Submitted,

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# About The Legal Aid Society

The Legal Aid Society (LAS), the nation's oldest and largest not-for-profit legal services organization, is more than a law firm for clients who cannot afford to pay for counsel. It is an indispensable component of the legal, social, and economic fabric of New York City – passionately advocating for low-income individuals and families across a variety of civil, criminal, and juvenile rights matters, while also fighting for legal reform.

The Legal Aid Society has performed this role in City, State, and federal courts since 1876. It does so by capitalizing on the diverse expertise, experience, and capabilities of more than 2,000 attorneys, social workers, paralegals, and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in 26 locations in New York City, LAS provides comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel.

LAS's legal program operates three major practices — Civil, Criminal, and Juvenile Rights — and receives volunteer help from law firms, corporate law departments and expert consultants that is coordinated by LAS's Pro Bono program. With its annual caseload of more than 300,000 legal matters, The Legal Aid Society takes on more cases for more clients than any other legal services organization in the United States. And it brings a depth and breadth of perspective that is unmatched in the legal profession.

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Appearance Card         I intend to appear and speak on Int. No.       Res. No.         I in favor       in opposition         Date:		
<ul> <li>in favor ☐ in opposition</li> <li>Date:</li></ul>		
(PLEASE PRINT)          Name:       Daniel Heinberg         Address:       Drector         I represent:       May and State and return to the Sergeant-at-Arms         I represent:       Please complete this card and return to the Sergeant-at-Arms         Image:       Image:	I intend to ap	
Name: Daniel   Address: Drector   I represent: May and South and return to the Sergeant-at-Arms   Address:   Please complete this card and return to the Sergeant-at-Arms THE COUNCIL Address: Please complete this card and return to the Sergeant-at-Arms The Council		
I represent:	Name:	(PLEASE PRINT) Daniel Steinberg
Address: Please complete this card and return to the Sergeant-at-Arms  THE COUNCIL THE COUNCIL THE COUNCIL THE COUNCIL THE COUNCIL The Council and service and se	Address:	Director
Please complete this card and return to the Sergeant-at-Arms   THE COUNCIL   THE COUNCIL   THE COUNCIL   The counce Card     I intend to appear and speak on Int. No.   I in favor   I in favor   I in opposition   Date:   (PLEASE PRINT)   Name:   Address:   HAA DEPART AND CHA   I represent:	I represent:	Manyor's affice of operations
Intend to appear and speak on Int. No.       Res. No.         In favor       In opposition         Date:       Intender         Name:       Average Average         Address:       Hog Average         I represent:       May Average	Address:	
Intend to appear and speak on Int. No.       Res. No.         Intend to appear and speak on Int. No.       Res. No.         In favor       In opposition         Date:       Intender         Image:       Image:	Please	e complete this card and return to the Sergeant-at-Arms
I intend to appear and speak on Int. No Res. No in favor in opposition Date: (PLEASE PRINT) Name:(PLEASE PRINT) Name:(PLEASE PRINT) Name:(PLEASE PRINT) I represent:(PLEASE OF CLASSE)	-	
in favor in opposition Date:		
(PLEASE PRINT) Name: <u>Lavren Quinches</u> Address: <u>tirst Deputy Directer</u> I represent: <u>Maya's attice at Grevations</u>		
Address: <u>tirst Deputy Director</u> I represent: <u>Maya's Office at Grevations</u>		Appearance Card       pear and speak on Int. No.       In favor       In opposition
I represent: Maya's office at chevations		Appearance Card
	I intend to app Name:	Appearance Card
Address:	I intend to app Name: Address:	Appearance Card
	I intend to app Name: Address: I represent:	Appearance Card

THE COUNCIL
THE CITY OF NEW YORK
Appearance Card
I intend to appear and speak on Int. No Res. No in favor in opposition
Date: 3 1/12014
(PLEASE PRINT) Name: Manuel Demarco
Address: 12 Sanday Street 14 184,0007
I represent: Pusikat Larol 1456 DC 37
Address:
Please complete this card and return to the Sergeant-at-Arms
THE COUNCIL
THE CITY OF NEW YORK
Appearance Card
I intend to appear and speak on Int. No Res. No
in favor in opposition
Date:
(PLEASE PRINT)
Address:
I represent:
Address:Break MY 10491