



**Testimony of Administrator Joslyn Carter, LCSW  
New York City Department of Homeless Services**

**Before the New York City Council Committee on General Welfare  
Oversight Hearing: Families with Children in DHS Shelters**

**June 11, 2024**

Good Afternoon. My name is Joslyn Carter and I serve as Administrator of the New York City Department of Homeless Services. I would like to thank Deputy Speaker Ayala and the members of the Committee on General Welfare for holding today's hearing on Families with Children in DHS Shelters.

At the outset, I want to reassure the Council that at DHS we recognize the vulnerability of the families we serve and understand that families experience trauma from housing instability. Our objective is to carefully and compassionately meet the full needs of the people we serve while they are in our care. That includes serving as the bridge towards connections with the resources to meet the very real psychosocial, and socio-emotional needs, of families experiencing homelessness.

We understand housing is a critical part of wellbeing and the real dangers families face in these vulnerable moments. That is precisely why we aim to craft an intake process that meets our clients where they are and nurtures onward connections so that DHS can serve as an onramp to further social services. Our trauma-informed approach aims to treat each client with the dignity they deserve. Families come to us in a moment of crisis, and we work to stabilize them and quickly move them towards permanent housing.

I would like to take this opportunity to give the council and the public listening some insight into how our intake systems have developed over time and share our reasoning for why our systems are as they are. I will also offer a review of the legislative proposals, with attention to fiscal, operational, staffing, and service process flow impacts.

DHS' Prevention Assistance and Temporary Housing (PATH) intake center is a front door to our services that is sized, staffed, and designed to meet the needs of families with children. As a last resort, families that have fallen on hard times come to PATH, which is located at 151 E. 151<sup>st</sup> Street, in the Bronx. PATH is open 24 hours a day, 7 days a week, 365 days a year.

Prior to the establishment of PATH, we had multiple intake centers and we found that families were spending an average of 20 hours in the intake process. Today, on average families spend 6 to 7 hours at PATH. That is a dramatic decrease in the amount of time families are spending at intake. PATH allows us to realize economies of scale, offer wraparound services, and serve as a critical node in diversion, screening, and assessment required for placing families in shelters.

We have staff at the front door and at reception that greet families as they enter the building and inquire about the family's reason for coming to PATH. Families are then directed to the intake area where we have staff prepared to begin the application for shelter. During this time, discussions with clients also focuses on the needs of children within the household, including school enrollment. We explain next steps and offer families an opportunity to ask questions.

When new applicants and those families reapplying after more than 30 days ago arrive at PATH, they are engaged by PATH social service workers. These workers provide crisis counseling, mediation services, and referrals to community-based resources as an alternative to shelter. For those families with housing options still available in the community, PATH social service workers collaborate with HRA Homeless Diversion Unit (HDU) caseworkers, and Homebase offices throughout the five boroughs to put services in place to help families retain or secure independent housing without having to enter shelter. All families reapplying for services following a break in shelter services of less than 30 days, except those who have experienced domestic violence, are also referred to meet with a Resource Room social service worker who then collaborates with HRA Homeless Diversion Unit (HDU) team to further explore ways to avoid shelter entry through family mediation, legal services, HRA emergency grants, and rental assistance.

There is no one-size-fits-all solution for families - their circumstances are unique, their needs are unique, and we need to take the time to listen, learn, and connect them to the resources that best serve. For instance, a family may have had a non-physical argument that could benefit from family mediation. For that family, family mediation could be the course to avoiding shelter altogether. We find that approximately 13% of families are diverted from shelter.

If families have no alternate housing options immediately available such that they would qualify for homeless prevention services, they are interviewed by a DHS family worker who obtains the family's two-year housing history, which serves as the basis for determining shelter eligibility. During the interview process, families may be assigned a conditional shelter placement while DHS investigates and assesses the family's individualized needs. Conditional placements last for 15 days on average. During this time, field specialists visit the homes of family and friends with whom the family previously resided to verify information provided during the interview. During this conditional placement, social service staff and social workers from DHS arrange in-person meetings, whenever possible, with families applying for shelter and family or friends they lived with previously to further pursue mediation and explain in greater detail available homeless prevention services and rental assistance programs to return to the community. Once the investigation is completed, an eligibility determination concerning the completeness of the application and the availability of other housing is written, reviewed, and provided to the family in the shelter placement.

We conduct our eligibility assessment in accordance with New York State social services law and regulations from our oversight agency the New York State Office of Temporary and Disability Assistance (OTDA).

PATH benefits from our co-located sister agencies who partner in delivering their insights and services. The Department of Education (DOE) is represented at PATH in the form of family assistance staff who serve as a critical point of linkage with NYC schools, offering an opportunity to discuss transportation and educational needs. Administration for Children's Services (ACS) staff provide collaboration and consultation as related to abuse or neglect cases. Our partners from the Human Resources Administration (HRA) No Violence Again does safety assessments for families who indicate domestic violence, have a domestic violence history, or there is a suspicion of domestic violence while present at Path. Additionally, HRA's Homebase team serve as a link to further homeless prevention services and aftercare services. There is also a medical provider, the floating hospital which is on-site to conduct health screens and other health education as necessary.

With that larger context in mind, I now turn to the legislation being heard today.

Intro. 123 would preclude the Department of Homeless Services (DHS) from requiring that every member of a family be present at its intake center when that family seeks placement at a shelter. We have made accommodation for the logistical challenge of having all children under 18 present at intake. Currently, all adults in the family are required to appear, however children under the age of 18 can appear remotely for the initial visit. They are not required for any subsequent visits. We believe the system we have in place maintains the appropriate balance between the necessity of having eyes on children to screen and assess for real potential needs, while also offering the flexibility and recognition of the potential challenge posed to a family.

For families that choose to bring their children to PATH, we have a Children Wait Space on site with educational activities and fun games. Initially designed to accommodate children whose parents were being interviewed by the NoVa Social Workers to avoid re-traumatization, we have since expanded to serve all children.

Intro. 124 would require the department of homeless services to provide process navigator services to every family with children at an intake center. Intro. 440 would require the Department of Homeless Services to ensure that eligibility specialists are available at every shelter to assist residents with determining eligibility for public assistance benefits.

Introductions 124 and 440 focus on roles and functions that already exist in our system. Our intake staff is trained to guide families through this process. We offer an explanation to every family that comes to us with multiple touchpoints – immediately at the front door- with greeters, at the window where registration occurs, as they exit elevators, and throughout their time in the waiting areas. Our managers, case managers, social workers, family workers, or medical providers have been charged with explaining the process and offering families the opportunity to ask questions. We structure this system of touchpoints to make sure families feel safe, secure, and deliver a consistent, supportive message in the intake process. Prior to becoming DHS Administrator, I had the privilege of directly overseeing PATH, I understand the intent of Intro 124 and the idea of adding process

navigators, but I believe we are already providing that navigation over the course of intake itself and I do not believe adding another navigation layer would be advisable.

With regard to the eligibility specialist in Intro. 440, at intake we have a host of staff on site who are responsible for ensuring that family's needs are met. This begins with the leadership and staff at PATH, followed by the shelter directors, directors of social services, case workers, housing specialists, social workers, and operations staff at shelter who all play a constructive role in fulfilling the responsibilities of guiding clients to resources and services. We understand that shelter is temporary, and we are aiming towards housing stability, in-community where our clients can attain their goals. Assessing exit to permanency is part of our process. One key to ensuring that this happens is ensuring that Public Assistance Cases are open. We have staff both at the front door and at the shelter level who already help in doing this work. We want to make sure applications for public assistance occur and work towards clients putting appropriate applications in. At intake, we have staff onsite, helping open these cases; furthermore, Independent Living Plans include eligibility and applications as part of the toolkit in driving towards exit and permanent housing.

Once at shelters, Families meet with staff to complete an Independent Living Plan (ILP) There are then biweekly meetings with staff to update these Independent Living Plans (ILP). –The ILPs can include procuring entitlements families may be eligible for, referrals for mental health, educational, or job preparation opportunities, or referrals for other services that may be needed to best assist clients. In addition to being a component of ILPs, Access HRA is a tool in this ILP process; our providers have been trained in Access HRA. Serving as our online benefits portal, Access HRA allows clients to gain information on and apply for government programs including Cash Assistance, SNAP (Food Stamps), Fair Fares NYC, the Home Energy Assistance Program (HEAP), Medicaid, CityFHEPS and Child Support.

Because we have this layered system in place, including contact with case managers, Access HRA, and Independent Living Plans, we do not believe legislating a specific title and accompanying ratios to be appropriate.

Introductions 453 and 460 focus on expanding families with children intake, through an additional intake center in Brooklyn or Queens, and through producing a feasibility report on community-based organizations viability for accepting and processing intake. There are manifold advantages of centralized intake. Those advantages include consistent screening of critical factors and assessment for conditions related to medical needs, mental health needs, substance use, adult and child protective services, and domestic violence. Moreover, centralization fosters continuity of service by taking advantage of co-located interagency links (e.g. DOE, ACS, HRA NoVA and HRA, Homebase as well as medical). Centralization also allows us to benefit from economies of scale in addition to cost concerns. Intake is a complex process with a host of regulatory compliance requirements (e.g. client privacy) accordingly, centralization allows us to deliver services with consistency and clear monitoring for deviations from best practice. Those advantages mean there are significant drawbacks to the proposals envisaged by Introductions 453 and 460.

As we discussed in 2023, we believe a feasibility study is a prerequisite to considering an additional PATH site, therefore we would be supportive of moving forward with a feasibility study



that encompasses the design requirements that went into PATH, and that takes into account the capital cost of building a new facility, location considerations, staffing requirements, and obligations to meet our federal and state legal/regulatory mandates.

We are working to exit families. In January, The Adams Administration launched “Women Forward NYC: An Action Plan for Gender Equity,” an investment aimed at making New York City a national leader on gender equity. Supported through city dollars, private and public partnerships, academic institutions, and federal grant funding, this “living action plan” is a framework for all of the Administration’s efforts addressing gender disparities going forward and takes immediate action to connect women to professional development and higher-paying jobs; dismantle barriers to sexual, reproductive, and chronic health care; reduce gender-based violence against women; and provide holistic housing services, including for formerly incarcerated women and domestic and gender-based violence survivors. Through Women Forward, the Administration committed to increase families with children exiting shelter into permanent housing by 25% by 2030.

As part of the Adams administration’s comprehensive efforts to connect New Yorkers to safe, affordable homes we are aiding New Yorkers from intake, to exit, to transition into permanency. We continue to focus our efforts on moving families and individuals from shelter into permanent housing as quickly as possible.

This is challenging work. Our frontline staff, sister agency partners, and the community of providers are focused on aiding families through crisis towards permanency. I would like to take this opportunity to thank them and acknowledge their successes. While we acknowledge we have further work to do in delivering the highest quality social services to our fellow New Yorkers, we can also recognize the meaningful difference our hardworking staff and network of providers makes in the lives of children and families on a daily basis.

Thank you for this opportunity to testify. I look forward to your questions.



# Advocates for Children of New York

Protecting every child's right to learn

## Testimony to be submitted to the New York City Council Committee on General Welfare

**Re: Int. 0123-2024**

**June 11, 2024**

Advocates for Children of New York appreciates the opportunity to submit testimony in support of Intro. 123-2024, which would preclude the Department of Homeless Services (DHS) from requiring parents to bring their children to the intake center (PATH) when a family applies or reapplies for shelter.

For more than 50 years, Advocates for Children has worked to ensure a high-quality education for New York students who face barriers to academic success, focusing on students from low-income backgrounds. We assist and advocate for students whose needs are often overlooked, including students who are homeless.

We strongly support Intro. 123, precluding DHS from requiring a child's presence at PATH when a family applies or reapplies for shelter. During the pandemic, DHS temporarily stopped requiring children from attending shelter intake appointments. As a result of this change in practice, children did not have to miss school on days when their families applied or reapplied for shelter. This change should be codified and made permanent.

The City should be doing all it can to ensure students experiencing homelessness can get to school every day and ending practices and policies that contribute to absenteeism. **Students should not have to miss school when their families apply for shelter.** Intro. 123 would remove this barrier to school attendance and help prevent children, many of whom are already experiencing trauma, from being exposed to the stressful shelter intake process. We urge the Council to move forward with this bill as quickly as possible.

We appreciate the City Council's consideration of this important issue. Thank you for the opportunity to submit this testimony. Please do not hesitate to contact Jennifer Pringle at [jpringle@afcny.org](mailto:jpringle@afcny.org) if you have any questions.

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## **Testimony of Win (Formerly Women in Need, Inc.) for the New York City Council Committee on General Welfare Oversight Hearing June 11<sup>th</sup>, 2024**

Thank you to Chair Ayala and the esteemed members of the Committee on General Welfare for the chance to submit testimony on behalf of Win. My name is Maya Jasinska, and I am the Manager of Policy and Advocacy at Win, the largest provider of shelter and services to families with children experiencing homelessness in New York City. We operate 16 shelters and nearly 500 supportive housing units across the five boroughs. Each night, nearly 7,000 people call Win “home,” including 3,600 children. Reforming the Prevention Assistance and Temporary Housing Office (PATH) intake and assessment center is of utmost importance: When Win surveyed our clients last year, families said that improving the experience of intake at PATH was one of their top policy priorities.

Win families report that the process of applying for shelter at PATH is confusing and grueling, and that workers are insensitive and dehumanizing towards families when they already feel emotionally exhausted and unstable.<sup>i</sup> The long and arduous process and exigent bureaucracy force parents to miss days of work and children to miss school.<sup>ii</sup>

Worse, far too many families are found ineligible for shelter the first time they apply, subjecting them to the traumatic experience multiple times. In 2023, of the 1,889 families who entered a Win family shelter, 881 (47%) had two or more entries within the fiscal year. Of those 881 families, 489 (56%) were ultimately found eligible for shelter at Win (some portion of the other 44% may have also been found eligible for shelter, just not at Win). A 2023 report by the City Comptroller’s Office found that 80% of families were denied shelter upon first application.<sup>iii</sup> Many of these denials may have occurred erroneously, due to insufficient supervision and needlessly complicated procedures: The 2022 Comptroller’s Audit of PATH found that PATH personnel denied 42% of family applications without adequately investigating their housing history.<sup>iv</sup>

Not only is it inhumane to subject homeless families with children to this endless run-around, but it is also inefficient to investigate multiple applications and provide multiple conditional shelter placements for nearly half of the families with children in NYC shelters. It also prolongs the length of time families spend in shelter. On average, it takes a family 40 days to prove their eligibility through PATH, contributing to the over 500 days a family spends in shelter before moving out.<sup>v</sup> As one Win parent told us, “*You can’t keep a job if you keep on going back and forth to PATH.*” In addition to costing the City \$188 a night per family, these prolonged periods of homelessness can cause or exacerbate anxiety, depression, and other mental health issues.<sup>vi,vii</sup>

Experiencing homelessness is inherently traumatic, and entering the homeless system should not compound whatever trauma a family has already suffered. We seek policy solutions that simplify the process for a





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family to prove they need shelter and reduce erroneous denials. Council should also pass legislation to make the experience of being at PATH less confusing and more humane.

**Two pieces of legislation would help reduce the unreasonable bureaucratic requirements that families reckon with as they apply and reapply for shelter.**

**1. Intro 123: Prevent DHS from requiring children's presence at intake.**

Requiring children to be physically present at PATH is extremely harmful. PATH is a stressful environment where children may overhear information that parents wish to shield them from — like an explanation of their family's financial insecurity or history of domestic violence. As one Win focus group participant told us: *"I don't think that's an environment for kids to be in because they witness all of this stuff. Because sometimes you don't want to expose your kids to certain things."*

This exposure may exacerbate an already dire situation: Children experiencing homelessness are more likely to have poor physical and mental health and are at heightened risk for intimate partner violence, addiction, and depression.<sup>viii</sup> Furthermore, this requirement is disruptive to children's educations, when attendance rates for students living in shelter are almost 11 percent lower than their permanently housed peers.<sup>ix</sup> One Win parent reported that their children had to miss two weeks of school *"just from going back and forth to PATH and everything."*

DHS states that children must be present at intake in order to verify family composition and conduct a well-being screening. However, both actions are then repeated as part of shelter admission. Instead of requiring children to go to PATH, DHS can collect the information they need from shelter providers. Moreover, teachers can assess children's well-being and needs at school, where children belong, instead of at PATH. Win supports Intro 123, sponsored by Chair Ayala, legislation that precludes DHS from requiring children's presence at intake.

**2. Intro 1072: Reduce the Housing History Requirement.**

Win also supports Intro 1072, sponsored by Council Member Hudson, to reduce the required two years of housing history that families with children must demonstrate at PATH to one year. Documentation requirements can be insurmountable for families in housing crisis, who may be fleeing from situations of coercion and abuse that included the intentional theft of their critical documents, or who have lost or not received documents because of lock-outs and other types of displacement. Win clients have described being repeatedly found ineligible because PATH personnel were unable to contact their previous landlords/hosts: *"You cannot be held responsible for somebody not answering their phone... That's why I got found ineligible over 25 times. Because I couldn't verify two-year housing. Every week I was going there. Twenty-five times. I had stacks of ineligible papers... So I just had to hope that one of these people would answer their phones and not hold that grudge for the reason why they kicked me out and answer their phone and PATH would be like "Oh, you're eligible."* This legislation also proposes creating a digital case record with



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a family's housing history to streamline the eligibility process and sheltering families for at least thirty days in temporary shelter as their eligibility is determined.

### **Council can also pass four pieces of legislation to improve the experience of families while at PATH.**

#### **1. Intro 453: Open Family Intake Centers in More Boroughs**

Currently, PATH has only one location serving the whole of New York City. This means that families living in Jamaica or Far Rockaway or Staten Island must travel all the way to the Bronx, with all of their belongings, to apply (and reapply) for shelter. This is inefficient and burdensome and Win therefore urges Council to pass Intro 453, sponsored by Council Member Ung, which would establish an additional family intake center in either Brooklyn or Queens.

#### **2. Scheduling Appointments at PATH**

Currently, families sometimes spend entire days waiting at PATH, as leaving during the day means jeopardizing the progress made in their application. Win families have reported spending up to 14 hours at PATH when applying for shelter, with most of that time spent waiting to speak with a DHS staffer. This is physically exhausting, and particularly difficult for young children, especially when added on top of potentially long commutes to the intake site in the Bronx. As one Win parent described, "*The kids getting antsy and overwhelmed because a kid can only sit so long in a chair, you know. They want to run around. They're children, they don't understand the process of sitting there and waiting. They're just like okay, I'm here with Mommy but I'm getting restless. I want to run. I want to play. And you're getting frustrated because they're telling you 'Tell your child to sit down.'*"

The City must create a technological and administrative system that allows families to preschedule appointments or be assigned an appointment time upon arrival. This would allow families to tend to their other responsibilities rather than needlessly wait at PATH and could improve efficiency for DHS.

#### **3. Intro 124: PATH Navigators**

DHS is required to assist applicants in obtaining any information or documentation relevant to verifying applicants' eligibility for shelter. However, the Comptroller's audit found that DHS did not adequately attempt to assist 64% of the families in their review with obtaining the necessary information for investigations.<sup>x</sup> Furthermore, Win families report that they have received incomplete or unclear information and that processes are not explained, leaving them unsure about who they will be speaking with or what documents they will be asked to provide. Most families who had to apply multiple times correlated their eventual eligible determination and stable shelter placement with the luck of being assigned a more helpful case worker than in previous applications.





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The City must create a team of PATH Navigators, who would provide every family with standardized, clear information about the steps, meetings, and documentation necessary to apply for shelter. Council Member Ayala has introduced a bill that would require this—Intro 124.

#### **4. Intro 276: Mandate Trauma-Informed Care Training for All PATH Staff**

Before stepping foot into PATH, most families have already experienced trauma — often because of long-term housing instability, domestic violence, and/or poverty. Yet PATH, the very center designed to help vulnerable families, can be retraumatizing, with Win families describing their treatment at PATH as punitive and dehumanizing. As one Win focus group participant explained, *“They make you feel unwelcome. Because sometimes you go there and they talk to you like—they make you feel how you are: homeless. That’s how they really make you feel; like they’re better than you. Like, even a worker told me there one time, ‘Well this isn’t my issue. I have somewhere to sleep at night.’”*

By not taking into account the trauma and lived experiences of homeless families, the treatment and environment families face at PATH can trigger trauma responses, such as anxiety, challenges regulating moods and responses, and difficulty completing forms and navigating the application requirements. Every worker at PATH, including DHS contracted security firms, must receive training in trauma informed care and services to protect families and children from re-traumatization. Council Member Osse has introduced a bill that would require this—Intro 276.

**These policy changes to PATH will prevent trauma, unnecessary denials and reapplications, and ultimately decrease shelter stays. Council should also pass and fund innovative measures to improve the shelter experience for families with children.**

##### **1. Intro 440: Eligibility Specialists in Every Shelter**

We also support Intro 440, sponsored by Council Member Stevens, which would require public assistance eligibility specialists at shelters. These specialists would expedite the processing of benefits, which are vital lifelines for families and oftentimes prerequisites for other subsidies, such as housing vouchers. Additionally, these specialists would assure that clients of nonprofit providers receive equal treatment of their public assistance case as their peers in DSS shelters.

##### **2. Local Law 35: Mental Health Specialists in Every Shelter**

It is often incredibly difficult for families experiencing homelessness to access mental health services. The City must fund and implement Local Law 35, which mandates clinical mental health professionals in every shelter for families with children, so that families experiencing homelessness can quickly access lifesaving mental healthcare in-person and virtually.



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Unfortunately, the current implementation model for Local Law 35 proposed by DSS would not allow mental health professionals to provide most services intended under the law. Worse, the City has not committed any of its own funding to implementation, and instead has directed service providers to fund this initiative out of their own budgets.

The City must provide additional resources to implement this law. Based on Win's cost estimates, Local Law 35 would cost about \$13.3 million to service the approximately 4,500 families at the City's 30 largest families with children shelters in FY25. This investment would benefit families and the City in the long run, as mental health treatments lead to better health and improved employment outcomes for recipients.

## **Conclusion**

New York City must identify ways in which PATH can be a tool for advancing the citywide goal of ending family homelessness, including PATH in a larger vision of how agencies work together to help alleviate poverty and its consequences for New York City families. The policies enumerated above would be a good place to start. I thank you for your attention to this critical issue. The Win team is available to provide additional materials and information.

Thank you!

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<sup>i</sup> Silva, Teminsky, and Yager. "Improving PATH: Dismantling Barriers to Shelter for Homeless Families with Children." Win Policy Brief Series, July 2021. [Improving\\_PATH\\_policybriefv2.pdf \(winnyc.org\)](#)

<sup>ii</sup> "Improving the Experience of Homeless Families at PATH." Win One-Pager, April 2022. [PATH-Reform-1-pager\\_4.20.22-.pdf \(winnyc.org\)](#)

<sup>iii</sup> New York City Office of the Comptroller. "Review of the New York City Department of Homeless Services' Programs and Services." August 2023. Available at: <https://comptroller.nyc.gov/wp-content/uploads/documents/MD22-105S.pdf>

<sup>iv</sup> New York City Office of the Comptroller. "Audit report on the department of homeless services' determination of temporary housing benefits for families with children." February 2022. Available at: [https://comptroller.nyc.gov/wp-content/uploads/documents/DHS\\_MG20\\_070A.pdf](https://comptroller.nyc.gov/wp-content/uploads/documents/DHS_MG20_070A.pdf)

<sup>v</sup> Jeanmarie Evely, "NYC's Homeless Shelter Population Ballooned in 2022. How Will Leaders Address the Crisis This Year?" CityLimits January 17, 2023. [https://citylimits.org/2023/01/17/nycs-homeless-shelter-populationballooned-in-2022-how-will-leaders-address-the-crisis-this-year/?mc\\_cid=2a90c2ff88&mc\\_eid=ef2de08f11](https://citylimits.org/2023/01/17/nycs-homeless-shelter-populationballooned-in-2022-how-will-leaders-address-the-crisis-this-year/?mc_cid=2a90c2ff88&mc_eid=ef2de08f11)

<sup>vi</sup> Mental Health," Ruff Institute of Global Homelessness. 2017 <https://ighhub.org/understandinghomelessness/causes-intersections/mentalhealth#:~:text=Homelessness%2C%20in%20turn%2C%20amplifies%20poor,depression%2C%20sleeplessness%20and%20substance%20use.>

<sup>vii</sup> Wasow Park, Molly and Carter, Jocelyn. "Preliminary Fiscal 2024 Mayor's Management Report." Mayor's Office of Operations, 2024. [dhs.pdf \(nyc.gov\)](#)



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viii American Psychological Association, “Mental Health Effects of Poverty, Hunger, and Homelessness on Children and Teens.” May 2024. [Effects of poverty, hunger and homelessness on children and youth \(apa.org\)](https://www.apa.org)

ix “Still Disconnected: Persistently Low Attendance Rates for Students in Shelter,” Advocates for Children of New York May 18, 2022.

[https://www.advocatesforchildren.org/sites/default/files/library/still\\_disconnected.pdf?pt=1](https://www.advocatesforchildren.org/sites/default/files/library/still_disconnected.pdf?pt=1)

x New York City Office of the Comptroller. “Audit report on the department of homeless services’ determination of temporary housing benefits for families with children.” February 2022. Available at:

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## Improving the Experience of Homeless Families at PATH

While all New Yorkers experiencing homelessness have a legal right to shelter, accessing shelter is an onerous process at best. For families experiencing homelessness, this process starts at the Prevention Assistance and Temporary Housing (PATH) assessment center — one location in the Bronx that all families must travel to. At PATH, parents and children spend an entire day in waiting rooms, filling out forms, providing documentation, and meeting with multiple workers — called “fraud investigators” — to tell and retell their story and prove they have no other housing options.

Win families report the process is opaque and grueling, and that workers are insensitive and dehumanizing at a time where they already feel emotionally exhausted and unstable. The long and arduous process means parents miss days of work and children who are already at an academic disadvantage miss days of school.

Worse, far too many families found ineligible for shelter the first time they apply, forcing them to undergo the traumatic experience multiple times. In 2018, 520 families entered a Win shelter at least twice in the year, representing 30% of all families Win served that year. And this trend has only worsened, with city data showing that in November 2021, 62% of families had to apply more than once before being found eligible.<sup>i</sup> According to the comptroller’s audit report, one family had to reapply 38 times before eventually being found eligible for shelter.<sup>ii</sup>

The City Council can improve homeless families’ experience at PATH by focusing on the following policies:

- **Mandate trauma informed care training for PATH workers.**

Before stepping foot into PATH, most families have already experienced trauma — often because of long-term housing instability, domestic violence, and/or poverty. Yet PATH, the very center designed to help vulnerable families, can be retraumatizing, with Win families describing their treatment at PATH as punitive and dehumanizing. Every worker at PATH, including DHS contracted security firms, must receive training in trauma informed care and services to protect families and children from retraumatization.

- **Make the pandemic-related exemption that allows children to stay in school and avoid PATH permanent.**

Requiring children be present at PATH places them in a stressful environment where they may overhear information that parents wish to shield them from — like an explanation of their family’s financial insecurity or history of domestic violence. This requirement also takes children who are already at an academic disadvantage out of school, widening the gap between them and their housed peers. According to DHS, families were required to bring their children to PATH when applying for shelter so the agency could certify the family’s composition and to conduct a health and well-being screening. During the pandemic, however, DHS has made children exempt from PATH and has still successfully met the needs of children and families. Despite this, the city has not agreed to make this change permanent and allow children to stay in school instead of appear in-person at PATH.



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- **Make permanent the pandemic-era rule that allows families to stay in shelter when they must reapply to PATH.**

After a family applies at PATH, they are “conditionally” placed in a shelter while DHS continues to investigate their eligibility for up to 10 days. If a family is found ineligible because their application was missing information, they can immediately re-apply — but they must pack up their belongings and return to PATH. This policy further destabilizes families, prolongs their housing insecurity, and can retraumatize parents and children alike. During the pandemic, DHS has allowed families to remain in their current conditional placement when they reapply for shelter. This practice must be made permanent, allowing families to continue receiving the supports that shelter provides while they reapply.

- **Provide appointment times for meetings at PATH.**

Win families have reported spending up to 14 hours at PATH when applying for shelter, with most of that time spent waiting to speak with a DHS staffer. However, because leaving PATH means jeopardizing the progress made in their application, parents miss work and children miss school just to spend the whole day waiting at PATH. The City must create a system that allows families to pre-schedule appointments or be assigned an appointment time upon arrival. This would reduce disruption, allowing families to tend to their other responsibilities rather than needlessly wait at PATH and make the process more efficient for DHS staff.

- **Create “PATH Navigators” to support families applying for shelter.**

Families facing homelessness arrive at PATH amid an overwhelming crisis that led them to seek shelter, and they are greeted with a hard-to-navigate and complex government bureaucracy. Win families report that they have received incomplete or unclear information and processes are not explained, leaving them unsure about who they will be speaking with or what documents they will be asked to provide. The City must create a team of PATH Navigators, who would serve a customer-service role at PATH and provide every family with standardized, clear information about the steps, meetings, and documentation necessary to apply for shelter.

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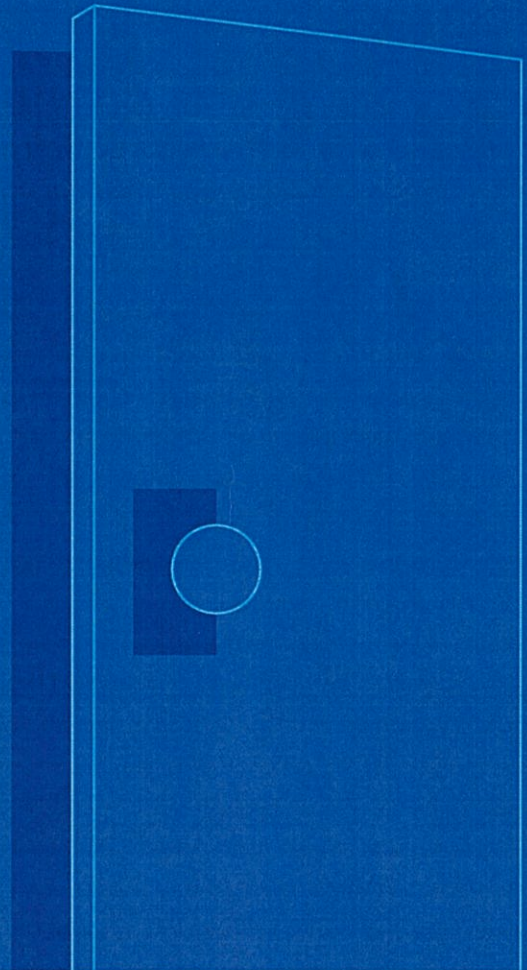
JULY 2021

**WIN POLICY BRIEF SERIES**

# Improving PATH

Dismantling Barriers to Shelter for  
Homeless Families with Children

By Josefa Silva, Cassidy Teminsky, & Jessica Yager



\* Generous support for this report was provided by Trinity Church Wall Street Philanthropies. The contents reflect the views of the authors and do not represent an endorsement by Trinity Church Wall Street Philanthropies.



# Overview

New York City is well-known, and often lauded, for having a right to shelter for people experiencing homelessness. That legal requirement has been transformative and has resulted in a city where the majority of people without homes are sheltered. However, accessing shelter is not as simple as walking through the door; New Yorkers in need face structural barriers to accessing shelter. Homeless families with children must demonstrate that they have no other place to stay in order to get access to shelter. Families applying for shelter—overwhelmingly Black and Latinx—face a system that is set up to turn them away—to distrust and question their requests for help. They face a system that often adds to, rather than ameliorates, the trauma they have experienced.

Typically, families gather every member and all of their essential belongings to go to the Prevention Assistance and Temporary Housing assessment center (PATH), the city's sole application and intake center for families with children in need of shelter, which is operated by the Department of Homeless Services (DHS). At PATH, families spend the day in waiting rooms, filling out forms, providing documentation, and going from meeting to meeting to tell (and retell) their story of hardship and undergo assessment. They begin by meeting with workers charged with diverting families from shelter, after which they begin the DHS application for shelter. The application requires families to prove that they have no other housing option, which means providing two years of personal information that DHS investigates to verify that a family is truly homeless. These investigations, conducted by staff known as “fraud investigators,” do not help or serve families in any way. Instead, they reveal the inaccurate and damaging stereotype through which the system views low-income families of color who look to it for help: as dishonest cheats.

These application and eligibility policies and processes are not only symptomatic of a broken system, but also cause the immediate damage of prolonging housing instability for families in crisis. Diversion and investigation measures are a stop gap for managing the daily shelter census, and too often merely delay shelter entry without preventing it. Moreover, as families are forced to move from place to place because they cannot access shelter,

these policies often force them into unsafe and otherwise inappropriate living conditions. Below in this brief, we share the experiences of Win families and Win and citywide statistics that illustrate just how traumatic this process is.

New York City must ensure that the shelter eligibility system is fair and equitable and works with other services towards the goal of ending family homelessness. This will require a systemic reform effort and an overhaul of guiding values and principles that should be directed and overseen by City Hall as part of the next administration's new approach to ending homelessness (directed by the First Deputy Mayor, as outlined in Win's *Every Family Housed: A Blueprint to End Family Homelessness for the Next Mayor*).<sup>1</sup> The city must work with the state to rationalize and humanize the shelter and benefit eligibility rules and processes that create unnecessary barriers to services. And, the city must also identify ways in which PATH can be a tool for advancing the citywide goal of ending family homelessness, including PATH in a larger vision of how agencies work together to help alleviate poverty and its consequences for New York City families.

However, there are also **immediate steps** the city must take so that families in need of shelter today undergo a fair process and are protected from further trauma. This brief focuses on these needed reforms, outlined in more detail in *Solutions* in the next section.

***The city must immediately:***

**LOWER BARRIERS TO SHELTER AND SERVICES.**

- Revise application documentation requirements to be reasonably accomplishable within the ten day conditional period, beginning with reducing the required housing history from two years to one.
- Accept a family's attestation for the reasons they cannot return to a previous residence as true.
- Establish Navigators at PATH to provide clear information and support to families going through the application process.
- Halt practices that force families and children to miss school and work to spend the entire day, sometimes more than once, at PATH. Provide time windows for application meetings.

**PROTECT FAMILIES FROM TRAUMA.**

- Require all staff interacting with families at PATH to be trained in trauma-informed care, and provide coaching and supervision to ensure implementation.
- Make permanent the pandemic-prompted exemption of children at PATH. Verify family composition and child well-being through remote methods and shelter staff.
- Codify the COVID period practice of allowing families to continue in their shelter placement while they re-apply for shelter.

These steps are needed to ensure that our safety net systems are actually helping families and furthering the goal of ending family homelessness, which must be a top priority for the next mayor.



# Background

**A**t Win, New York City's largest provider of shelter and supportive housing for families with children, we noticed a troubling pattern in our shelter admission data: a high percentage of shelter-eligible families entered Win multiple times in one year. Further data analysis showed that the majority of families with multiple admissions had left shelter after a brief stay, and that they had left because the Department of Homeless Services (DHS) had found them ineligible for shelter after investigating their application, only for the family to reapply and return with another conditional shelter placement. Concerned that families in need were cycling in and out of shelter because the application and investigation process were blocking them from finding stability in shelter or in the community, Win conducted a series of focus groups to learn about PATH and the application process from families who had been through it.

## Accessing Shelter

In order to access shelter in New York City, families with children must apply in person at the Department for Homeless Services' (DHS) sole intake and assessment center, the Prevention Assistance and Temporary Housing (PATH) center, located in the Bronx. This means missing school and work, as every member of the family—including children—must be present. Not knowing where they will be sent, families pack whatever they can fit into the two bags they are permitted to bring to PATH, choosing between toys and other treasured belongings and the items that will be essential to their time in shelter.

Families and children spend up to fourteen hours at PATH, meeting with multiple intake, assessment, and diversion workers to complete their application for shelter. As part of the application, families must prove they are homeless. In most cases, families must furnish documents or other corroboration of every place they stayed during the previous two years. Documentation requirements can be insurmountable for families in housing crisis, who may be fleeing from situations of coercion and abuse that included the intentional theft of their critical documents, or who have lost or not received documents because of locks-outs and other types of displacement. While documents are reviewed and this investigation is conducted, DHS provides families with a shelter placement on a conditional basis, pending eligibility findings of the investigation into their application. Families may also be diverted from entering shelter that day, before they file an application.

DHS uses the housing history and emergency contacts each family must provide to assess whether or not they truly have a housing need by investigating whether any of these households can take the family in. These investigations are conducted by people known as “fraud investigators,”<sup>2</sup> and include contacting past landlords, hosts, friends and family members to determine whether the family can stay with any of them (even if the household refuses, DHS may still find that the applying family is not homeless because they have somewhere to go). DHS states that investigations and the resulting eligibility determination are made in ten days or less of application.<sup>3</sup> During the investigation, a family may need to provide additional information and attend follow-up appointments at PATH. If the investigation ultimately results in an ineligible finding, the family must pack up and leave the shelter placement they were provided on a conditional basis while an investigation was being conducted. For many families, this means leaving a shelter to go directly back to PATH, where they begin the application process again and are provided another conditional placement.

A family can be denied shelter for various reasons, including not providing documentation that the PATH worker deems adequate of their two-year housing history, or because DHS determines they can return to live at one of their past addresses. **A family can be denied shelter even if the home DHS has identified for them refuses to take them in.** The family must then leave their shelter placement, but can return to PATH immediately to reapply. In many cases, the family receives a new conditional shelter placement while their re-application is being processed. But this is not true



in all cases; if a family reapplies after being denied because DHS determined they have somewhere else to stay, they will not be provided with a new conditional placement until 30 days have passed since the denial.

The process we have outlined here has been modified in two important ways due to the COVID-19 public health crisis. First, families are not required to bring children to PATH when they apply for shelter. Second, a family who is found ineligible because of a documentation problem is able to stay in their conditional shelter placement if they want to immediately reapply (as opposed to leaving their placement just to immediately get another conditional placement at PATH). As we explain in the sections that follow, we urge DHS to make these two critical changes permanent.

### Troubling Evidence that Application Policies and Processes Prolong Instability

In May of 2019, nearly 2,500 families with children applied to DHS for shelter.<sup>4</sup> Of those who applied, nearly 60 percent were found ineligible for shelter and about 41 percent (1,029 families) were found eligible. **Among families found eligible in May 2019, about 42 percent (over 460 families) had submitted a previous application.** This means that **DHS processed and investigated over 460 applications at least twice—some as many as six times—before ultimately finding the families who entered shelter in eligible.**

Moreover, 22 percent of May's eligible families (about 228 families) submitted at least three applications.\*

#### MAY 2019 PATH STATS

- 1,029 families found eligible for shelter
- 436 applied more than once (42% of eligible families)
- 228 applied at least 3x (22% of eligible families)

Multiple applications often also mean multiple conditional placements in shelter. In 2018, about 520 families—representing 30 percent of all families served by Win that year—entered a Win shelter at least twice in the year. **Of eligible families with multiple admissions to Win in 2018, 67 percent (about 350 families) had left because their previous conditional placement ended with an ineligible determination.**

\* A similar pattern can be seen during the first six months of 2019: DHS found about 41 percent of families who applied eligible; and about 45 percent of those eligible families had applied at least once before.

Not only is it traumatic and inhumane to subject homeless families with children to this endless run-around, but also, it is also inefficient to investigate multiple applications and provide multiple conditional shelter placements for more than four out of ten of the families with children in New York City shelters.<sup>5</sup> New York City's Independent Budget Office reports that from 2002 to 2012 the city spent about two percent of the DHS budget annually on intake and eligibility reviews for families with children.<sup>6</sup> Based on this historical spending level, **DHS could spend as much as \$44.2 million of the \$2.2 billion DHS budget adopted for fiscal year 2022 to intake and investigate whether they can deny shelter to the families with children who apply for it.** By contrast, the city allocated \$34 million—ten million dollars less—to CityFHEPS for fiscal year 2022, the city's rental assistance voucher program that is primarily provided to New Yorkers in homeless shelters to help them find and afford housing. The choice to invest more money in investigating families in need than in helping them afford housing is disgraceful.

The result of this choice is that homeless families with children are being subjected to extended housing and school disruption in order to repeatedly attempt to satisfy application and documentation requirements to secure a stable shelter placement. And the implications of this can be lifelong, especially for children and youth whose educational success is jeopardized by having to miss school to attend appointments, or because they are not provided transportation to school from a conditional shelter placement. Homeless students more frequently change schools mid-year, disrupting both academic learning and socio-emotional well-being. Not surprisingly, over half of homeless students are chronically absent from school, and nearly a third transfer schools mid year.<sup>7</sup> The results are lower reading and math proficiency rates, lower graduation rates, and stifled life outcomes.

Not only is extended instability damaging, but also, the experience of the application and eligibility process has been described as traumatizing and dehumanizing.



## Inside the Application Experience: Insight from Win families

Focus groups and interviews with Win families conducted by Win's research team in 2018 provided insight into the dynamics of the shelter application process. These conversations highlighted the skeptical and punitive approach taken toward families seeking help, as well as the tremendous emotional toll of navigating this often traumatic process.

### Proving Eligibility: Too Much Left to Chance

In focus groups with families, four common experiences emerged:

- DHS claims that they are unable to independently verify housing history within the required timeframe;
- The DHS investigator was unable to corroborate parts of a family's housing history due to unresponsive or uncooperative past landlords or hosts;
- Families were ineligible because they were found to have other living options, even if they were deemed unhealthy, unsafe, or otherwise inappropriate by the parent/applicant; and
- Families were ineligible because they were found to have other living option, even if that other living option was expressly telling DHS they would not take the family in.

A fourth experience was shared by families who had to submit multiple applications: they more frequently expressed lacking information or clarity about the application process and about documentation requirements than did families found eligible on their first application. Additionally, most who had to apply multiple times correlated their eventual eligible determination and stable shelter placement with the luck of being assigned a more helpful case worker than in previous applications.

These insights point to inconsistencies and poor service quality that are deeply disturbing. Whether or not a family in need is able to access stable shelter cannot depend on the cooperation of friends or family with a DHS investigation, or on DHS' thoroughness and fairness

in assessing as available housing options that a family has already deemed unsafe or inappropriate. Families report being expected to stay in buildings where crime and behaviors such as public drug use were ubiquitous, and in places where they would be exposed to mold and other toxins.<sup>8</sup> DHS can also determine that a family applying for shelter has a housing option in a home where the primary tenant has told DHS the family cannot stay.

Neither should eligibility rest solely on the family's ability to untangle and navigate a complex, opaque process and timeframe on their own in the midst of their housing crisis. And stable shelter definitely cannot be a matter of random assignment to one case worker or another. These factors make all the difference when it comes to whether a family will be admitted to shelter but they may not have anything to do with whether a family is homeless. The stakes are too high to continue to leave the housing stability of vulnerable families to chance. DHS must provide transparency, support, and consistent, quality services. And DHS must trust that families seeking help know what is best for their family.

### The Human Toll Taken at PATH

Before stepping foot into PATH, most families experiencing homelessness have experienced trauma. Trauma occurs when a person has gone through events that are physically or emotionally harmful and have lasting effects on their well-being and functioning.<sup>9</sup> Trauma causes feelings of fear and helplessness, and often overwhelms one's ability to cope. Trauma can interfere with a person's ability to complete daily tasks, and can manifest externally in many ways, including as confrontational or other apparently problematic behavior. Many of the common experiences of homeless families, such as intergenerational homelessness, domestic violence, and poverty, are traumatic. Homelessness itself is a traumatic experience, as families lose their sense of normalcy and safety.<sup>10</sup>

During focus groups, all families (those found eligible on their first application and those who submitted multiple



applications) describe their experience at PATH and with the eligibility determination process as a grueling ordeal, compounding the trauma and crisis they are often already experiencing.

Families frequently described behavior from PATH staff that was dehumanizing, punitive, and demoralizing. The treatment some families received at PATH triggered anxiety responses and was often re-traumatizing.

**“It’s like you are in jail. Like they’re a police officer and you’re the criminal. They be a little bit too harsh, too much.”**

—WIN FOCUS GROUP PARTICIPANT

The treatment they received from staff made many families feel judged and shamed by those who were supposed to help them. Win families describe it as:

**“They make you feel unwelcome. Because sometimes you go there and they talk to you like—they make you feel how you are: homeless. That’s how they really make you feel; like they’re better than you. Like, even a worker told me there one time, ‘Well this isn’t my issue. I have somewhere to sleep at night.’”**

—WIN FOCUS GROUP PARTICIPANT

**“PATH is not a place where people are trying to go...They make you feel, almost like you’re not wanted there, like we don’t want to deal with you, we don’t want to deal with this.”**

—WIN FOCUS GROUP PARTICIPANT

By not taking into account the trauma and lived experiences of homeless families, the treatment and environment families face at PATH can be retraumatizing and can trigger trauma responses, such as anxiety, difficulty regulating moods and responses, and difficulty completing forms and navigating the application requirements.



# Solutions

Accessing shelter must be made fair and trauma-informed. Based on the alarming experiences of homeless families with children, Win is calling for reforms to make the shelter application process more humane, fair, and efficient.

## 1. **Revise documentation requirements so that they can reasonably be fulfilled within the ten day conditional shelter period, beginning with reducing housing history to one year.**

For many families with children, PATH is one stop in a longer journey of housing instability. Yet DHS requires documentation corroborating every place a family has stayed over the previous two years. The difficulty and burden of providing documentation and corroboration of two years of their housing history often proves insurmountable for families in housing crisis, resulting in a denial of shelter. **Notably, in fiscal year 2019, about 85 percent of ineligible decisions for families in Win shelter were due to an incomplete housing history.** Win families reported struggling to gather all required documentation within the conditional period, and receiving little support from DHS in the process. DHS must revise documentation requirements, beginning with limiting housing history to one year.

## 2. **Accept a family's attestation for the reasons they cannot return to a previous residence as true.**

The nature of family homelessness makes *proving* homelessness an onerous and unfair requirement. For most, PATH is the last resort after exhausting all other resources. Nonetheless, pursuant to state law, the city must assess a family's housing need in order to find them eligible for shelter. As part of this obligation, the city can investigate whether a family can return to a place they stayed in the past. DHS exercises this discretion even when a family says that they are unwelcome, unsafe, or otherwise unable to go back to an address.

These investigations are prone to incorrect determinations, as they depend on the responsiveness and transparency of landlords, acquaintances, and those whom a family has stayed with in the past. The regulations also permit DHS to turn a family away from shelter even if the alleged housing alternative they have stated they will not take the family in—thus knowingly turning away families with children who have nowhere else to go.

Further, investigations are intrusive and indicative of a distrust of families seeking assistance. Adults seeking shelter in New York City do not have to prove they are homeless. Families with children should be treated with the same trust and dignity. This does not mean that PATH cannot work with a family to make an alternative option viable; and there may be times that families actually do have other options for places to stay that are uncovered during the application process. But, these determinations should be made working with families, not through investigations that discount and undermine families' own best judgment. And, the city must end the practice of denying people shelter even when it knows a family will be rejected by the home the city has deemed appropriate.

Precedent for accepting self-attestation of need to satisfy eligibility requirements exists. For example, the U.S. Treasury Department permits self-attestation of economic hardship in order to access COVID rent relief programs.<sup>11</sup> There is also precedent for waiving investigations in the New York City shelter system. In response to a petition from the de Blasio Administration, the New York State Office of Temporary and Disability Assistance (OTDA), the body that regulates New York City shelter, granted the city leeway in implementing shelter eligibility rules in late 2015. DHS ceased conducting investigations. In the months following the change, DHS found a greater percentage of applicants eligible, and



the number of families in shelter rose.<sup>12</sup> The city then petitioned OTDA again, this time to reverse the rule change. The state restored the city's obligation to investigate whether or not shelter applicants could stay with a friend or family member. Following this change, the percentage of families found eligible decreased to previous levels, creating more housing instability for more families, and the number of families submitting multiple applications increased.<sup>13</sup>

### **3. Establish PATH Navigators, to provide clear, consistent information and support to families at PATH.**

Families arrive at PATH in the midst of one of the most overwhelming crisis imaginable, and are expected to navigate a complex government bureaucracy. As reported by Win families, applicants at PATH are provided incomplete or unclear and confusing information about applying for shelter and about eligibility determination. Neither are they informed of what to expect at PATH—who they are speaking with, when they will be called in to a meeting, or why they are asked to provide certain information—nor of resources such as child care that are available at the center.

PATH and shelter application must be demystified. A customer-service type desk staffed by PATH Navigators must be put in place to provide every family at PATH with standardized, clear information and to answer questions about PATH, what to expect during their day at PATH, and the shelter application and eligibility determination process.

DHS must provide PATH Navigators who have the expertise and sensitivity to support struggling families. People who have experienced homelessness, PATH, and shelter application process have unique insight into strategies for avoiding common challenges and pitfalls in the process. They can also offer insight into dealing with and getting through the day at PATH, and into needs that may arise after, including the need for psychosocial support. This expertise is a valuable resource for others in similar circumstances, and DHS should endeavor to recruit and incentivize people with this lived experience to be PATH Navigators.

**“They’re always changing everything. All of the documents, the stuff that...they provide to us sometimes. Some of them don’t tell you what is there. Sometimes you have to find out yourself.”**

—WIN FOCUS GROUP PARTICIPANT

### **4. Provide time windows for meetings at PATH.**

Parents and children report spending up to 14 hour days at PATH in order to apply for shelter and to receive a placement and transportation. Much of this time is spent waiting. Because parents do not know when they will be called in to speak with a worker, and are told that they must be present when called, they cannot leave PATH without jeopardizing the progress made in their application. Unable to leave to pick up children from school or child care, parents have little choice but to take their children out of school and activities to spend the day at PATH. Neither can parents make arrangements to avoid missing work if they must be on call at PATH.

Forcing parents who are juggling work, school, and caregiving responsibilities to put everything on hold to spend a day in waiting rooms would not be tolerated in any other context. Homeless families should be extended the same consideration, and provided time windows for when they must be present for meetings.

**“Their communication in that building is horrible. They just send you around. Everybody should be on the same page. ‘Oh, you’re supposed to see such and such, go here.’ But nobody’s talking.”**

—WIN FOCUS GROUP PARTICIPANT

### **5. Provide trauma-informed services at PATH.**

In any context, it would be considered unprofessional to make comments or engage in behaviors that are judgmental, dismissive, or intentionally hurtful or punitive toward clients. In the context of homeless families and children seeking shelter, many of whom



are seeking refuge from violence or insecurity, it is abusive. Yet these are the types of interactions and rule enforcement that families in Win shelter describe witnessing and receiving at PATH. Families, and their well-being, are hurt by it.

**“Personally, I wanted to cry. And I cried there because I get anxious. And everybody’s different, and sometimes they don’t have a professional person to deal with different types of people.”**

—WIN FOCUS GROUP PARTICIPANT

Every worker at PATH, including DHS contracted security firms and non-profits providing services, must be trained in trauma, and in providing trauma informed care and services. This is critical to protecting families and children from trauma triggers and from retraumatization, as well as for supporting their ability to navigate the application process. Trainings must be accompanied by on-going coaching and supervision to ensure that the interactions, environments, and services provided are trauma informed.

**6. Make permanent the exemption of children at PATH.**

Families describe PATH as inappropriate for children. Children are expected to sit quietly in office chairs for hours and sometimes for various days in a row, and cannot go outside to play or eat for fear of not being present when called to meet with a worker. Bringing children and youth to PATH also means that they witness adult conversations between parents and workers, sometimes overhearing information that parents wish to shield their children from. Further, the environment at PATH is described as tense and highly emotionally charged, a place where stress and anxiety are palpable.

**“Arguing. Fighting. That’s why I said I don’t think that’s an environment for kids to be in because they witnessing all of this stuff. Because sometimes you don’t want to expose your kids to certain things.”**

—WIN FOCUS GROUP PARTICIPANT

Finally, homeless students face tremendous academic disadvantages. They are 1.5 times more likely to be chronically absent compared to housed students.<sup>14</sup> Chronically absent students are less likely to pass their English language arts and mathematics state assessments, and are more at risk of being held back a grade than their regularly attending peers.<sup>15</sup> DHS must not be a reason homeless students miss school.

DHS requires that children and youth go to PATH with adults on the first day they apply on the grounds that PATH workers must verify documents and family size and composition. However, DHS’ administrative needs do not justify exposing vulnerable children to further trauma and disruption. DHS also contends that they must conduct health and well-being screening of children to intervene in the case of immediate, presenting needs. But both actions—verifying family composition and well-being screenings—are then repeated as part of shelter admission. Instead of requiring children to go to PATH, DHS can collect the information they need from shelter providers. Moreover, if children don’t have to be at PATH they can be at school, with teachers able to assess their well-being and needs.

The need to reduce the number of people at PATH during the pandemic trumped DHS’ stated reasons for requiring children and youth to present themselves. So too does protecting children from trauma and from missing school. DHS must permanently stop requiring children and youth to go to PATH.

**7. Allow families to remain in their conditional shelter placement while they reapply.**

If a family is found ineligible for shelter because their application is missing information, they are able to immediately return to PATH to begin the application process over, and many families do just this. However, even if they are just going to immediately reapply, families are required to pack their belongings, leave their conditional shelter placement, and return to PATH to complete the new application. A new application may come with a new conditional shelter placement and the family may be placed in the same shelter while DHS investigates their new application, but the process of packing and once again leaving the place they are staying can cause uncertainty and stress, and can be retraumatizing, for families and children dealing with a history of housing insecurity.

DHS can reduce stressors and exposure to potentially retraumatizing experiences by allowing families who are immediately reapplying to remain in their conditional placement while they submit their next application. This has been the DHS policy during COVID to reduce the number of people at PATH, and should be made permanent. Families should have the stability of remaining in the same shelter until DHS has grounds to deny them services for a reason other than missing information.

# Conclusion

Whether or not these alarming statistics and stories reflect compliance with New York City's legal obligation to provide homeless families with shelter is beyond the scope of this brief. But, there is little question that the intake process at PATH fails to meet the city's moral obligation to house homeless families. Moreover, the process is inefficient for the city and often traumatizing for families.

DHS and other agencies established to serve vulnerable families must actually serve them and avoid inflicting harm. Yet the shelter application and eligibility policies and processes are built on suspicion and distrust of the families who turn to it—predominantly low-income families of color—and function to deter families in need from seeking and accessing help. Creating administrative requirements that are onerous and opaque, especially for a family in housing crisis, and subjecting families to punitive and demeaning treatment only serves to control shelter numbers in the short-term, while prolonging housing instability at the cost of family well-being. These policies are also cruel and unjust. And the disdain and distrust

they belie towards the families seeking assistance could not be clearer. New York City must stop assuming that because some is poor they are a liar or trying to manipulate the system. It must stop designing its programs based on this toxic belief.

Lowering barriers to shelter does not increase homelessness. It decreases housing instability and makes it possible for families in need to get help. Instead of investing in prolonged investigations into whether or not a family with children is pretending to be homeless when they show up at PATH, the city must invest in making the system more efficient and humane toward the ultimate goal of ending family homelessness.



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## ABOUT WIN

Win is New York City's largest provider of shelter and services for homeless families with children. Across its shelters and supportive housing, Win transforms the lives of New York City's homeless women and their children by providing a holistic solution of safe housing, critical services and innovative programs they need to succeed on their own—so the women can regain their independence and their children can look forward to a brighter future.

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[winnyc.org](http://winnyc.org)





Good afternoon, members of the committee, and thank you for the opportunity to speak with you. My name is Chloe Smith, and as the Director of Programs at Children's Health Fund, I lead CHF's Healthy and Ready to Learn program.

Today we are hearing about ways that New York City can better support families with Children in DHS Shelters. We're happy to support Councilwoman Ayala and others as they introduce bills that will make life a little less challenging for unstably housed families across NYC. At Healthy and Ready to Learn we work in schools every day, and we know many of the students and families whose lives will be meaningfully impacted by these bills. We understand that children need to be IN school to learn. They also need to be able to see the board, and hear their teacher. To do their best learning, they can't be distracted by hunger or tooth pain.

Children and families don't only need supportive policies, they also need programs, services and other supports that ensure their health needs are met and the environments where they live, learn, and play, are safe, are connected, and provide opportunities for developing strong relationships with caregivers.

HRL provides such support. We work with schools and parents to ensure that students are well positioned to thrive in school.

HRL was developed by Children's Health Fund in 2014 as a part of our mission of supporting kids so they can thrive. It was developed recognizing the importance of education in helping kids to reach their potential, and that they need to be their healthiest selves to take advantage of educational opportunities. The program is designed to help schools identify and address health issues (many rooted in social, racial, and economic inequities) that impact student learning. We call issues like asthma, dental concerns, vision problems, and the experience of trauma, health barriers to learning. HRL, therefore, has evolved to include supporting trauma sensitive school and home environments to better address the fallout from the COVID-19 pandemic and surrounding social issues like increases in overt racism and Violence.

Through our current model, we leverage findings from our flagship school, PS 49 in the Bronx and in Councilwoman Diana Ayala's district (D-8), to inform materials and trainings that we conduct with educators and parents citywide and through our Resource and Training Center (RTC). Launched in 2017, RTC is an online platform that enables Children's Health Fund to scale our impact to reach students throughout New York City. Our online repository is equity and diversity focused and houses a broad library that includes infographics, fact sheets, interactive learning images, slide decks, external resource links. We have worked with partners, including the Office of Students in temporary housing to ensure that our resources are inclusive to newly

arrived immigrant families, and families living in shelters, doubled up, or in other challenging housing environments.

Here is a snapshot of RTC's and HRL's impact:

- Since 2017, nearly 44,000 users have accessed the website to request trainings, view recorded workshops, and download free materials to support their health and education work.
- In FY 2023, our most recent, complete NYCC grant year, the RTC had 5,893 users.
- From January 2023 to the present, we trained in 28 schools in 18 districts—delivering 69 parent workshops, 10 student workshops, and 4 professional development workshops—reaching 2,276 individuals. This coming fiscal year, with the support of NYCC we hope to expand into additional NYC school districts where teachers and parents need us most.

With the help of the City Council, HRL reaches thousands of families and educators throughout the city, every year, giving students the best chance of succeeding in school and life, no matter their housing circumstances.



**Testimony of Juan Diaz  
Citizens' Committee for Children of New York**

**Submitted to the New York City Council on Families with Children in DHS Shelters  
Oversight Hearing General Welfare**

**June 11<sup>th</sup>, 2024**

Since 1944, Citizens' Committee for Children of New York has served as an independent, multi-issue child advocacy organization. CCC does not accept or receive public resources, provide direct services, or represent a sector or workforce; our priority is improving outcomes for children and families through civic engagement, research, and advocacy. We document the facts, engage, and mobilize New Yorkers, and advocate for solutions to ensure that every New York child is healthy, housed, educated, and safe.

Thank you, Chair Ayala and all the members of the Committee on General Welfare, for holding today's oversight hearing on the wellbeing of families with children in DHS Shelters.

CCC is a steering committee member of the Family Homeless Coalition (FHC), a coalition comprised of formerly homeless mothers and 20 organizations representing service and housing providers and children's advocacy organizations united to end family homelessness.

New York City is facing a shelter capacity crisis that disproportionately impacts families of color. The trauma that children in shelter experience can have severe negative impacts on their overall wellbeing. The recently published [CCC's Keeping Track of New York City's Children: 2024](#) data book underscores the urgent need to increase funding and advance legislation to improve the overall wellbeing of children living in shelter and to expedite their shelter exits. [Keeping Track](#) findings revealed that as of January 2024, more than 30,000 children reside in a DHS shelter. In FY23, 95% of family households in shelter were either Black (37%) or Hispanic (58%). Families with children continue to face unacceptably long lengths of stay in shelter, with an average of 438 days spent in shelter in FY23. At the same time, we can see the positive impact when families receive the support they need: 16 percent of families who exited shelter without a housing subsidy returned to shelter within one year, compared to only 0.3 percent of families with a subsidy.

CCC applauds the City Council's efforts to improve services within DHS shelters and urges city leaders to prioritize funding appropriation when bills are passed. These investments will have a permanent and long-term effect on the health of New York's children, families, and communities.

**To improve services at DHS shelters, implement new programs, and retain staff, we urge the City Council to support the restoration of the Mayor's 2.5% PEG to DHS contracted**

**shelter providers for FY25 and the outyears.** As you know, shelter providers reduced vacancies and collapsed multiple positions into one to meet the Mayor's November budget cut. We will continue to see service delays, longer shelter wait-times, and more families experiencing homelessness if the city does not act to fully staff these critical positions.

CCC also applauds the City Council for uplifting legislation to improve the experiences and outcomes of children and families experiencing homelessness. **We strongly support Intro 0123, which will codify the DHS practice of not requiring children to be present at PATH intake.** This inhumane practice has created multiple barriers for parents seeking service and can prove traumatic for children.

**CCC also supports the following three bills. However, as part of the Budget negotiations, we urge the City Council and City Administration to ensure adequate funding is appropriated to implement these bills. DHS and DHS shelter providers must have the resources needed to meet new requirements.**

- **CCC supports Int 124**, which would provide process navigator services at DHS intake centers for families with children applying for shelter and provide essential guidance to supportive services at PATH.
- **CCC supports Int 440**, which would require the department of homeless services to designate eligibility specialists at shelters. This position would help improve the access to resources available for families in shelter and improve their socio-economic well-being.
- **CCC supports Int 0453**, which would require the establishment of new shelters and intake centers in all five boroughs, therefore reducing the time that families with children must travel to have access to shelter services.

**We also urge the City Council and the Administration to make the following investments in this year's budget to improve outcomes for homeless families:**

- Fund and implement CityFHEPS eligibility expansion, which would remove shelter stay and housing court history requirements, preventing entrance into and expediting exits from shelter.
- Invest \$45 million for the Vacant Unit Readiness program, to make available the 5,040 vacant NYCHA apartments available for families and individuals facing housing insecurity.
- Invest \$4.4 million to increase the New York City Commission on Human Rights budget to \$18 million in Fiscal 2025, to support voucher-holding households that experience income discrimination.

Furthermore, CCC supports the actions taken by the City Administration to fund and baseline resources for shelter-based community coordinators in FY25 and outyears and we are thankful for the City Council's long time support of this initiative.

Lastly, we support the City Council's advocacy and join with them in urge the City Administration to end the inhumane time-limits shelter stay policy that severely impact immigrant children overall wellbeing. Due to the 60-day shelter rule, community-based organizations have reported that immigrant children are forced to missed school days and struggle with their education attainment.

Thank you for your time and consideration.



**Testimony of Baaba Halm  
Vice President and Market Leader, Enterprise Community Partners**

**The New York City Council Committee on General Welfare  
Oversight – Families with Children in DHS Shelters**

**June 11, 2024**

My name is Baaba Halm, and I am the Vice President and Market Leader at Enterprise Community Partners. Enterprise is a national nonprofit that exists to make a good home possible for the millions of families without one. We support community development organizations on the ground, aggregate and invest capital for impact, advance housing policy at every level of government, and build and manage communities ourselves. Since our New York office opened in 1987, we have committed more than \$5.3 billion in equity, loans and grants to affordable housing and community to create or preserve over 83,000 affordable homes across New York State.

On behalf of Enterprise, I want to thank Chair Ayala and the members of this Committee for the opportunity to submit testimony on this important topic. Enterprise serves as a co-convener of the Family Homeless Coalition (FHC), a collection of more than 20 diverse organizations in the homelessness, affordable housing, child welfare, and education spaces. Our Coalition also has in a leadership role the support of four Fellows, women with lived experience in family homelessness who educate FHC members and help to shape the group's policy priorities. The following testimony is informed by our work within the FHC.

**Overview**

The Institute for Children, Poverty and Homelessness reports that as of May 2024 there are 18,949 families with children in DHS shelter – including more than 32,570 children overall. While down slightly from January 2024 highs, these staggering numbers are part of a steady acceleration that began in Spring 2022. The cause of this trend is multifaceted, including the increase of migrant and asylum-seeking families, the lack of affordable housing options as evidenced in the historically low vacancy rate, the failure to enact new rental assistance tools at the State level, and the delay in implementation of enacted CityFHEPS reforms.

The impacts of this crisis will be felt generationally. The negative effects of homelessness on educational and health outcomes, family preservation, employment prospects and many other important metrics is well-documented. It is imperative that we all work together on a suite of

solutions to rapidly reverse this trend for the benefit of all of New York's families. Below are a number of important priorities and recommendations for consideration.

### **Homelessness Prevention**

- We urge the implementation of Int. 893-A, Int. 894-A, Int. 229-A and Int. 878-A, i.e. the expansion of CityFHEPS and commend the City Council for holding the Administration accountable to implement these laws. These important reforms would expand access to the voucher and reduce barriers to its use, and together would have a positive impact on preventing entrance into shelter and expediting placement out.
- Human Resources Administration (HRA) staffing shortages must be addressed in this year's City budget agreement to ensure families in need have efficient access to public benefits, CityFHEPS processing, and other important resources.
- Resolve contracting and budget processing issues that delay payments to the legal and homeless service organizations are also critical in preventing homelessness.

### **Access to Permanent Housing**

- We applaud the efforts of the teams at the New York City Housing Preservation & Development (HPD) and the New York City Housing Development Corporation (HDC) to expedite the lease up and homeless set-aside processes. Steps such as instituting back-end audits for income verification and elimination of credit checks for those with rental subsidy are helping to reduce delays. These must be met by additional streamlining steps to greatly reduce the amount of time affordable and homeless units remain vacant.
- The NYC Commission on Human Rights is responsible for enforcement of source of income discrimination, which remains pervasive despite New York's strong laws. The Commission has gone from 48 staff attorneys in its Law Enforcement Bureau to 17 in 2024. We urge \$4 million in additional funding to bring the Bureau back up to pre-pandemic staffing levels.

Thank you for your consideration and for the opportunity to submit this testimony.





**Presented before the  
New York City Council  
Committees on General Welfare  
Oversight - Families with Children in DHS Shelters  
June 11, 2024**

Thank you, Chair Diana Ayala and members of the General Welfare Committee for the opportunity to testify at today's oversight hearing on Families with Children in DHS Shelters. I am Dr. Xellex Z. Rivera, Chief Program Officer at Housing Solutions of New York (HSNY).

The Housing Solutions of New York, formerly the Bronx Parent Housing Network, is committed to ending homelessness in New York City. We accomplish our mission by delivering essential support services, as well as creating holistic paths to employment and stability so that individuals and families experiencing homelessness can secure and retain safe, clean, affordable, and permanent housing.

HSNY offers emergency/transitional housing and support services at 20 facilities in New York City through the Department of Homeless Services (DHS). In FY23, 75 percent, or 15 out of 20, of HSNY's emergency housing facilities served families with children (FwC), which are mostly headed by single women. Thirteen of these FwC facilities are located in the Bronx, and two are located in Queens. In the last year, HSNY has served 1050 families with emergency housing and support.

We would like to thank Speaker Adrienne Adams and the members of the City Council for their relentless advocacy and efforts to support unhoused New Yorkers. We also applaud the steps that the Mayoral administration has taken to help ensure housing security for some of our most vulnerable New Yorkers.

**Families with Children in DHS Shelters**

Recent data highlights that there is an upward trend in the number of family homelessness. As reported by the [Institute for Children, Poverty and Homelessness](#), during 2023, New York City family homelessness increased from 12.7 thousand to about 19.4 thousand by the end of the year. As reported in DHS's Daily Report, on June 2, 2024 there were nearly 19,000 families in DHS shelters, including over 32,000 children. Today, more than 70 percent of individuals in shelters are families with children and adult parents.

The recent increase in families living in shelters is due largely to the current asylum seeker crisis which HSNY has partnered with the city to address. HSNY has provided shelter for over 3,000 migrants with the opening of five commercial hotels. To this day, two of the Brooklyn sites have transitioned to sanctuary sites with the continuing effort to provide resources for the "New" New Yorkers. Included in this number is over 200 families with children in areas that require two fare zones making it difficult to navigate the city, between school and applying for services.





Notably, even before the asylum seeker crisis, New York City families were facing a homelessness crisis. In 2019, about [70 percent](#) of DHS shelter residents were families with children, most of whom were headed by single mothers, and on December 1, 2019 over 21,000 children slept in a DHS shelter.

### **Challenges & Recommendations**

The challenge of experiencing homelessness is often worsened by the experiences of navigating the city's shelter system. The bureaucratic barriers involve complex paperwork and strict eligibility requirements, which can be challenging for those without proper identification or documentation. We applaud the Council for introducing legislation that could help provide some relief to homeless families as they navigate the shelter system. HSNY would like to partner with the City Council to ensure that operations of the shelter system become achievable and sustainable, promoting success rather than overwhelming and further exacerbating the trauma level of each family experiencing homelessness. We would like to go on record in support of the following:

- **[Int 123](#)**: Currently, DHS requires the presence of every family member at the Prevention Assistance and Temporary Housing (PATH) intake center to complete an initial assessment and receive shelter placement. This policy often leads to children missing out on school to be present with their parents during intake. The child(ren) missing school hampers their education and contributes to falling behind academically. The stress and instability of the intake process can also have severe emotional and psychological effects on children, causing anxiety, fear and a sense of insecurity. The intake process is long and mundane. To that end, we are supportive of Int 123 sponsored by Council Member Ayala.
- **[INT 124](#)**: Housing is critically important for those in shelter as it provides the stability and security necessary for individuals and families to rebuild their lives. However, the process is not easy. Stable housing allows people to focus on long-term goals such as securing employment, pursuing education, and addressing health needs without the constant worry of where they will sleep each night. As a response, we support Int 124, introduced by Council Member Ayala. Navigator services will help families understand the housing procedures, meetings, and requirements for the shelter application process.
- **[Int 440](#)**: Housing specialists serve as vital resources for families in shelters by working with clients to determine the housing options and subsidies they qualify for and assisting clients with completing program [applications](#) and screening processes for programs. A housing specialist assists in the process by guiding individuals through the often complex and bureaucratic steps required to obtain housing. Navigators can help with completing necessary paperwork, accessing rental assistance programs, and connecting clients with landlords willing to rent to individuals transitioning out of homelessness. Unfortunately, eligibility specialists often have high [caseloads](#) and they are not required to be at every shelter. Introduction 440, sponsored by Council Member Stevens, provides an opportunity to increase imperative support for FwC in DHS shelters.

Thank you again for your partnership and the opportunity to testify today.

Please contact Dr. Xellex Z. Rivera at [x.rivera@hsfnny.org](mailto:x.rivera@hsfnny.org) with any questions regarding this testimony.



**HOMELESS SERVICES UNITED**

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**Homeless Services United's Written Testimony for the NYC Council General Welfare Committee's Hearing on Families with Children in DHS Shelters on June 11<sup>th</sup>, 2024.**

My name is Eric Lee and I'm the director of policy and planning at Homeless Services United. Homeless Services United (HSU) is a coalition representing mission-driven, homeless service providers in New York City. HSU advocates for expansion of affordable housing and prevention services and for immediate access to safe, decent, emergency and transitional housing, outreach and drop-in services for homeless New Yorkers. Thank you, Deputy Speaker Ayala and members of the General Welfare Committee, for the opportunity to submit written testimony.

HSU is grateful to Deputy Speaker Ayala and members of the Council for your steadfast leadership and commitment to ensuring families and individuals experiencing the trauma of homelessness can continue to access emergency shelter and services critical to stabilizing their lives and helping them to transition back into permanent housing within their communities.

**Homeless Services United is supportive of Ints. 123, 124, and 453, which would help make the intake DHS family intake process more client-centered, and less disruptive and traumatizing for the family.**

**Regarding Int. 440, while HSU shares the Council's concerns about ensuring robust services within family shelters, where we need the Council's leadership and support to achieve stronger services is through protecting DHS contracted non-profit providers from further budget cuts, restoring DHS' 2.5% PEG to all non-profit shelter contracts for FY25 and outyears, and ensuring that the FY25 City budget restores cuts to MOCS and funds DSS, DHS, and MOCS to expand their budgeted headcount to process contracts and budget payments on time for providers.**

**Non-profit human service providers need to be nimble to adapt their program models and services to the changing needs of their clients. Legislating services within programs stifles flexibility and innovation, limiting our responsiveness as new issues and needs emerge in the field. Providers need reliable procurement processes and reimbursements to make the work sustainable and give their organizations the ability to pivot when asked by the City.**

As HSU previously testified, our non-profit members are owed anywhere from \$700,000 to up to \$31 million for services rendered. DSS and DHS are currently redeploying staff to accelerate efforts to address the backlog of Form 65A subcontractor approval forms and

invoice requests, but this is a temporary measure. **Headcount within DSS and DHS budget and finance have not expanded over the years to match the workload, as the number of contracted DHS issued doubled. Budgeted headcount with DSS, DHS and MOCS must be expanded to meet the need and ensure the City avoids future delays.**

While the City assures providers that future improvements to PASSPort will enable more streamlined processing of procurement contracts and reimbursements, we do not understand how the City plans to achieve these efforts given their significant cuts to MOCS in the FY25 City Budget. **MOCS testified at the City Council Contract's Committee on June 4<sup>th</sup>, 2024 that reductions to their headcount and OTPS will mean slower processing of contracts registrations and reimbursements as well as slower response times for IT tickets for the PASSPort system which providers utilize to address bugs and other errors with their contract budgets and invoices within the system.**

MOCS stated that the OTPS cut will equate to a reduction of one-hundred thousand service hours for their two external IT vendors who are working on PASSPort improvements and IT tickets. We do understand the City's rationale for cutting funding to MOCS when non-profits doing business with the City through DHS and other City agencies continue to experience significant delays with their budget registrations, amendments, new needs, Form 65As and invoice reimbursements. **If MOCS' FY25 budget is not restored and their budgeted headcount not expanded, it will mean further fiscal delays for non-profits doing business with EVERY City Agency, as non-profits continue to bleed, carrying costly private loans to cover the City's dysfunctional payment delays.**

#### **Regarding Legislation Being Heard:**

- HSU supports **Int 123**, which would codify that children are not required to be present at PATH intake centers when families are applying for shelter. We are heartened to hear that DHS has moved away from the rigid in-person requirement for children, and this legislation would codify that humane change to policy.
- HSU supports **Int 124**, to provide process navigator services at DHS intake centers for families with children applying for shelter to help guide them through the process to apply and access services and stabilize their housing. The DHS system is extremely complex and having someone focused on helping a family to navigate the process can make the experience less dehumanizing and help connect them to additional resources.
- HSU is supportive of **Int. 453** and implementing a no-wrong-door approach to shelter, and we would welcome the Council's support in siting new shelters and intake centers in all five boroughs. In addition to creating new Family With Children Intake Centers, the City could also benefit from creating additional intake options

for Single Adults and Adult Families. Single Adult Men experiencing street homelessness often site going through the 30th St. Men's Intake Center as the main disincentive for entering shelter, and if the City could create more client-centered intake centers to engage single adults as well as families with children, they could see additional households accepting shelter sooner. Actions would need to be taken to ensure client rights are upheld and services offered, and we have the expectation that any new centers would be appropriately resourced to do so.

- Regarding **Int. 440**, we appreciate the Council's intentions of improving services within DHS shelters, but as previously stated, to achieve robust services we ask for the Council's support in calling for the restoration of the Mayor's 2.5% PEG to DHS shelter budget personnel lines for FY25 and the outyears. DHS shelters reduced vacancies and collapsed multiple positions into one to meet the Mayor's budget cut, and these cuts permanently reduce staffing within shelters, when demand is at an all-time high.
  - DHS shelter staff currently assist their clients in trying to apply for public benefits, and we do not believe that this bill will achieve the outcome of the Council, to improve access to public benefits, as the bottleneck with HRA process benefits applications. Shelter staff help clients submit applications and documentation repeatedly without prompt follow-up from the agency.
  - We are concerned this bill would be an unfunded mandate for already lean shelter budgets and could mean reductions in non-mandatory services to fund these staff lines. DHS is currently instructing family with children shelter providers to cut social workers within their family shelter to fund implementation of Local Law 35 passed by the Council to enhance mental health services.
  - Shelter providers should not be graded for metrics outside their control as this bill proposes, as access to benefits ultimately rests on HRA's ability to process applications.
- Regarding **proposed Int 460-A**, the possibility of extending the ability to CBOs to do shelter intake should be considered very carefully to avoid further retraumatizing of families from churning through the system in conditional status or are wrongfully denied shelter in the first place. Providers would need to be properly resourced and trained, have access to full access to information technology, and subject to the same third-party monitoring and oversight to ensure families are appropriately served.

Thank you for the opportunity to submit testimony. If you have any questions, please feel free to contact me at [elee@hsunited.org](mailto:elee@hsunited.org).





Testimony of  
Coalition for the Homeless  
and  
Legal Aid Society

before the General Welfare Committees  
of the New York City Council

on

Oversight: Families with Children in DHS Shelters

submitted by

Alison Wilkey  
Director of Governmental Affairs & Strategic Campaigns  
Coalition for the Homeless

June 14, 2024

The Coalition for the Homeless (“Coalition”) and The Legal Aid Society (“Legal Aid”) welcome this opportunity to testify before the New York City Council’s Committee on General Welfare. As the court- and City-appointed independent monitor of the Department of Homeless Services (“DHS”) shelter system and counsel in the historic *Callahan*, *Eldredge*, and *Boston* cases that created the right to shelter in New York City (“NYC”), we are uniquely situated to provide insight into these pieces of legislation and challenges within the shelter system for families with children.

### **Increase Shelter Exits to Permanent Housing**

The Coalition and Legal Aid support reforms to make shelter more accessible to families with children. However, the Mayor should also do more to move people from shelters into permanent housing. The City has many tools at its disposal to do so that it has failed to fully implement, despite our repeated requests, including:

- **Increase staffing to timely move people out of shelter with the existing City housing voucher programs.** Legal Aid and the Coalition receive daily calls from clients in shelter who have found apartments to rent but they cannot move out of shelter because of the City’s failure to timely process their housing voucher paperwork, largely due to staffing shortages. Clients often wait weeks or months to move out of shelter due to administrative delays. In some cases, landlords become so frustrated with the delays that they end up renting the unit to someone else.
- **Rebuild and grow the source of income discrimination unit to meet current demand.** It is illegal in New York City for a landlord or a broker to refuse to rent to a prospective tenant because they intend to use a housing voucher. The Source of Income Unit at the New York City Commission on Human Rights (CCHR) is the sole team within the only agency with the power to enforce the NYC Human Rights Law in a *pro se* friendly administrative forum, but it lacks adequate staffing. CCHR needs more experienced attorneys and intervention specialists to process filed complaints and a robust pre-complaint intervention unit to respond to the immediate needs of unhoused New Yorkers experiencing discrimination.
- **Eliminate the long turn-around times to re-lease New York City Housing Authority (NYCHA) units after the prior tenant vacates and prioritize filling the 5,000 apartments that are sitting empty with households currently living in shelter.** City data shows the number of residents exiting shelters to live in NYCHA apartments is on pace to plunge by 80% this fiscal year compared to 2015.<sup>1</sup> Given the scale of homelessness, the Mayor should expedite the readiness of these apartments and make them available to families living in shelter.
- **Prioritize shelter residents for NYCHA Section 8 vouchers.** The re-opening of the Section 8 waitlist creates the opportunity for the City to prioritize applicants currently

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<sup>1</sup> New York City Comptroller’s Office, “Charting Homelessness in NYC,” accessed June 5, 2024, <https://comptroller.nyc.gov/services/for-the-public/charting-homelessness-in-nyc/exits-from-shelters/>

living in shelter and create a robust referral pipeline from DHS. At a minimum, the City must prioritize current New York City residents, instead of giving equal priority to people living outside of New York City.

### **The Need to Address Barriers to Shelter and Conditions in Shelter**

We support many proposed reforms that would make it easier for both families with children and adult families to obtain prompt and safe shelter placements and provide shelter residents with better services to help them move into permanent housing. Currently, when an applicant family applies for shelter at PATH (the DHS intake site for homeless families with minor children and pregnant people), the family is given a 10-day conditional placement while DHS investigates the family's eligibility. The eligibility investigation involves an arduous and complex process that requires a family to identify all of the places they have slept in the past two years and provide evidence of why they cannot return to any of those addresses.

Most families are rejected for bureaucratic reasons related to a lack of required documentation that is unavailable or impossible for them to obtain. If a family cannot prove even a few nights or weeks of housing history, DHS will find the family ineligible for shelter, and the family will have to reapply. Homeless families are frequently denied shelter when City intake workers incorrectly determine that the family has other options or fail to accept that a previous host (the "primary tenant") refuses to permit the return of a homeless family. Although the City provides families with "conditional" shelter placements during the eligibility process, repeated ineligibility determinations exacerbate stress and instability for homeless families encountering these obstacles. In 2023, only 42 percent of families with children who applied at PATH were found eligible for shelter and nearly a third of those who were ultimately found eligible had to apply multiple times. In April 2024, 31 percent of the families with children households that were found eligible for shelter had to submit more than one application over the prior 90 days before receiving this determination. Two percent of families with children that were found eligible for shelter had to submit six or more applications before being found eligible.

For years, Legal Aid and Coalition for the Homeless have advocated to eliminate or reduce the two-year housing history requirement, as families are unlikely to be able to return to places they lived more than a year ago. The DHS shelter system for adult families without minor children requires applicants to prove only one year of housing history. While we believe that the housing history requirement should be eliminated altogether for both populations, a reduction to one year would be a significant improvement and would allow families to achieve stability faster.

Issues with unsafe conditions in shelters are also a top concern for families once they are placed in shelter. Over the past two years, the Coalition has received increasing complaints about conditions from residents of shelters for families with children about vermin, leaks, and poor maintenance. Our inspections of shelters for families with children have also shown more issues with conditions. Families who are already struggling with the lack of stability attendant to living



in shelter should not be subject to pest infestations, water intrusions, and substandard living conditions.

### **Comments on Intros. 123, 124, 440, 453, and 460-A**

In addition to the issues and recommendations above, we offer comments on the following bills:

**Intro. 123-2024: Precluding the department of homeless services from requiring a child’s presence at an intake center when a family with children applies for shelter.** We support this bill as a codification of current practice in most instances, and to preclude requiring children’s presence in certain reapplication situations where presence is currently required. Children should be able to attend school, rather than forced to wait in an intake site all day.

**Intro. 124-2024: Requiring the department of homeless services to provide process navigator services to every family with children entering an intake center.** We support the goals of Intro. 124 to make the shelter intake process less burdensome. As described above, the biggest barriers to obtaining shelter for families with children are providing details about all housing for the past two years and proving that they cannot return to any of that housing. There are few forms that families must fill out during the intake, as information about prior housing is given verbally. It is unclear how a City-employed navigator will be able to help families with children establish their eligibility or navigate the process better than existing City employees at the intake center. A navigator would be most effective if they can provide the family with clear information about the status of their case, the application process, and how to resolve any missing information.

**Intro. 440-2024: Requiring the department of homeless services to designate eligibility specialists at shelters.** We support Intro. 440, which would require the City to have an “eligibility specialist” at each shelter site, who is knowledgeable in benefits eligibility for clients. It is always to the benefit of our clients to have staff available who are knowledgeable in the benefits clients can access to help them move out of shelter and into permanent housing. However, we recently learned that shelter providers are being asked to cut other items in their budgets in order to provide mental health specialists, as is required by Local Law 35 of 2023. A mandate to provide eligibility specialists should not come at the expense of other services.

**Intro. 453-2024: Requiring the establishment of intake centers for families with children; and Intro. 460A-2024: Requiring DHS to report on the feasibility of partnering with community-based nonprofit organizations to accept and process applications for shelter intake from families with children.** The process of entering shelters is notoriously burdensome and stressful for homeless families. Currently, families with minor children must apply for shelter at a single citywide office, the PATH intake center in the Bronx, which can entail a long journey for people who are displaced from one of the other four boroughs. Establishing intake centers in the other boroughs, as Intro. 453 proposes, would likely reduce this burden for many families seeking shelter. Opening new intake centers may alleviate some of the pressure at

PATH and ensure that families can complete the intake process more quickly, rather than waiting in hours-long lines.

In addition to being in close proximity to public transportation, as the legislation requires, these facilities must be accessible to people with disabilities. Families should be able to access whichever intake center they prefer and must never be turned away and sent to a center in a different borough. DHS must also ensure there is coordination and communication across the various intake centers in case someone seeks assistance at multiple locations. The City should also explore increasing intake options for other shelter populations, including single men, single women, and adult families without minor children.

Similarly, Intro. 460-A would require DHS to report on the feasibility of partnering with community-based nonprofit organizations to accept and process applications for shelter by families with children. While this legislation is intended to make the shelter intake process more accessible, and could address some of the language access and cultural competency problems that plague the current process, we have questions about whether such decentralized intake could efficiently connect families to shelter placements and ensure that they have consistent experiences, regardless of which provider processes their applications.

These two bills could help homeless families, depending on how they are implemented, but they do not address the underlying problems with the onerous family shelter eligibility process. In addition to adding shelter intake centers for families in different boroughs and considering nonprofit intake partners, we encourage the City and State to address the many bureaucratic barriers that families face when they attempt to enter shelters, and to ensure that reforms are made that make it easier for both families with children and adult families to obtain prompt and proper shelter placements.

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### **About Legal Aid and the Coalition**

**The Legal Aid Society:** Legal Aid, 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 NYC – passionately advocating for low-income individuals and families across a variety of civil, criminal, and juvenile rights matters, while also fighting for legal reform.

Legal Aid 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 NYC, Legal Aid provides comprehensive legal services in all five boroughs of NYC for clients who cannot afford to pay for private counsel.

Legal Aid’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 Legal Aid’s Pro Bono program. With its annual caseload of more than 300,000 legal matters, Legal Aid 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.

Legal Aid's unique value is an ability to go beyond any one case to create more equitable outcomes for individuals and broader, more powerful systemic change for society as a whole. In addition to the annual caseload of 300,000 individual cases and legal matters, Legal Aid’s law reform representation for clients benefits more than 1.7 million low-income families and individuals in NYC and the landmark rulings in many of these cases have a State-wide and national impact.

Legal Aid is uniquely positioned to speak on issues of law and policy as they relate to homeless New Yorkers. Legal Aid is counsel to the Coalition and for homeless women and men in the *Callahan* and *Eldredge* cases. Legal Aid is also counsel in the *McCain/Boston* litigation in which a final judgment requires the provision of lawful shelter to homeless families. Legal Aid, in collaboration with Patterson Belknap Webb & Tyler, LLC, filed *C.W. v. City of New York*, a federal class action lawsuit on behalf of runaway and homeless youth in NYC. Legal Aid, along with institutional plaintiffs the Coalition and the Center for Independence of the Disabled-NY (“CIDNY”), settled *Butler v. City of New York* on behalf of all disabled New Yorkers experiencing homelessness. Also, during the pandemic, Legal Aid along with the Coalition continued to support homeless New Yorkers through litigation, including *E.G. v. City of New York*, Federal class action litigation initiated to ensure Wi-Fi access for students in DHS and HRA shelters, as well as *Fisher v. City of New York*, a lawsuit filed in New York State Supreme Court to ensure homeless single adults gain access to private hotel rooms instead of congregate shelters during the pandemic.

**Coalition for the Homeless:** The Coalition, founded in 1981, is a not-for-profit advocacy and direct services organization that assists more than 3,500 homeless and at-risk New Yorkers each day. The Coalition advocates for proven, cost-effective solutions to address the crisis of modern homelessness, which is now in its fifth decade. The Coalition also protects the rights of homeless people through litigation involving the right to emergency shelter, the right to vote, the right to reasonable accommodations for those with disabilities, and life-saving housing and services for homeless people living with mental illnesses and HIV/AIDS.

The Coalition operates 11 direct-services programs that offer vital services to homeless, at-risk, and low-income New Yorkers. These programs also demonstrate effective, long-term, scalable solutions and include: permanent housing for formerly homeless families and individuals living with HIV/AIDS; job-training for homeless and low-income women; and permanent housing for formerly homeless families and individuals. Our summer sleep-away camp and after-school



program help hundreds of homeless children each year. The Coalition's mobile soup kitchen, which usually distributes 800 to 1,000 nutritious hot meals each night to homeless and hungry New Yorkers on the streets of Manhattan and the Bronx, had to increase our meal production and distribution by as much as 40 percent and has distributed PPE and emergency supplies during the COVID-19 pandemic. Finally, our Crisis Services Department assists more than 1,000 homeless and at-risk households each month with eviction prevention, individual advocacy, referrals for shelter and emergency food programs, and assistance with public benefits as well as basic necessities such as diapers, formula, work uniforms, and money for medications and groceries. Since the pandemic, we have been operating a special Crisis Hotline (1-888-358-2384) for homeless individuals who need immediate help finding shelter or meeting other critical needs.

The Coalition was founded in concert with landmark right-to-shelter litigation filed on behalf of homeless men and women (*Callahan v. Carey* and *Eldredge v. Koch*) and remains a plaintiff in these now consolidated cases. In 1981, the City and State entered into a consent decree in *Callahan* through which they agreed: "The City defendants shall provide shelter and board to each homeless man who applies for it provided that (a) the man meets the need standard to qualify for the home relief program established in New York State; or (b) the man by reason of physical, mental or social dysfunction is in need of temporary shelter." The *Eldredge* case extended this legal requirement to homeless single women. The *Callahan* consent decree and the *Eldredge* case also guarantee basic standards for shelters for homeless men and women. Pursuant to the decree, the Coalition serves as the court-appointed monitor of municipal shelters for homeless single adults, and the City has also authorized the Coalition to monitor other facilities serving homeless families. In 2017, the Coalition, fellow institutional plaintiff Center for Independence of the Disabled – New York, and homeless New Yorkers with disabilities were represented by Legal Aid and pro-bono counsel White & Case in the settlement of *Butler v. City of New York*, which is designed to ensure that the right to shelter includes accessible accommodations for those with disabilities, consistent with Federal, State, and local laws. During the pandemic, the Coalition worked with Legal Aid to support homeless New Yorkers, including through the *E.G. v. City of New York* Federal class action litigation initiated to ensure Wi-Fi access for students in DHS and HRA shelters, as well as *Fisher v. City of New York*, a lawsuit filed in New York State Supreme Court to ensure homeless single adults gain access to private hotel rooms instead of congregate shelters during the pandemic.

Testimony by the New York Legal Assistance Group on

Families with Children in DHS Shelters

Before the New York City Council Committee on General Welfare

June 11, 2024

Deputy Speaker Ayala, Council Members, and staff, thank you for the opportunity to submit this testimony to the Committee on General Welfare on Families with Children in DHS Shelters. My name is Deborah Berkman, and I am the Project Director of the Shelter Advocacy Initiative and the Public Assistance and SNAP Project of the New York Legal Assistance Group (“NYLAG”).

NYLAG uses the power of the law to help New Yorkers experiencing poverty or in crisis to combat economic, racial, and social injustices. We address emerging and urgent needs with comprehensive, free civil legal services, financial empowerment, impact litigation, policy advocacy, and community partnerships. We aim to disrupt systemic racism by serving clients whose legal and financial crises are often rooted in racial inequality.

The Shelter Advocacy Initiative at NYLAG provides legal services and advocacy to low-income people residing in and trying to access homeless shelter placements in New York City. We work to ensure that every New Yorker has a safe place to sleep by offering legal advice and representation throughout each step of the shelter application process. We also assist and advocate for clients who are already in

shelter as they navigate the transfer process, seek adequate facility conditions and resources for their needs, and offer representation at administrative Fair Hearings.

I have worked with numerous single adults and families experiencing homelessness, including recent immigrants. Based on my experiences, I appreciate the opportunity to offer the following comments.

I- New-Immigrant Children in DHS Emergency Sanctuary Shelters

Before I discuss NYLAG's overwhelming support of all of the bills on today's agenda, I must report on the experience of my new-immigrant clients in DHS shelter. When sorted into the DHS shelter system, new immigrant families are overwhelmingly placed in DHS Emergency Sanctuary site shelters. While Emergency Sanctuary site shelters are operated by DHS, they lack the supports and resources of traditional DHS family shelters that non-new-immigrants are placed into.

We have heard numerous stories from our clients that highlight the ways that DHS Emergency Sanctuary site shelters are deficient. Many clients are unable to enroll their children in school and have not received help or guidance from shelter staff. I have several clients who do not have enough beds to accommodate all family members. In fact, one NYLAG client family has 7 family members in a room with only two double beds.

One of the biggest challenges NYLAG clients in Emergency Sanctuary site shelters report is that their children cannot eat the meals provided. Clients report having been given food that is still frozen or has visible mold, only being served cold foods, or being served the same meal several times per day. The majority of our new



immigrant clients report that their children experience gastrointestinal distress when they eat the provided meals, which has led to those children losing weight, and experiencing lightheadedness, headaches, and fatigue. Our team has worked with multiple families whose children are under close medical evaluation due to the symptoms they experience as a result of the food they are provided at the shelter.

These conditions are exacerbated when a child has a medical condition with dietary restrictions. In many of these cases, treating medical providers prescribe special diets that can only be managed with access to a kitchen. But reasonable accommodation requests for DHS to provide access to a kitchen are most often denied. And any success NYLAG clients have obtaining such accommodations requires a legal advocate to work alongside their medical professionals to prepare a request including certain critical language (even though the children's medical conditions necessitate the accommodation with or without an advocate's involvement). This is particularly problematic for families with children on the autism spectrum that struggle with certain food textures. Again, the likelihood of a request being approved for these cases often depends on the availability of a legal advocate working with medical professionals to prepare the request, and even then, requests are most often denied. Limited access to food has a devastating effect on children's mental and physical health.

Finally, clients often share racist and xenophobic comments and behaviors directed at them by shelter staff. Clients will cry recalling how staff members made humiliating comments to them and their children because they did not know shelter

rules, or for asking a question about a procedure. Clients report staff threatening to call CPS on them if they complain about staff behavior. Clients particularly report staff members trying to humiliate queer children and young girls, and publicly speaking and making judgements about girls' behavior towards boys in the shelter. These experiences humiliate our clients and as a result, clients distrust case workers and the services they provide.

DHS Emergency Sanctuary site shelters should have the same funding, supports and resources as all other DHS family shelters. Furthermore, DHS Emergency Sanctuary site shelter staff must undergo cultural competency training to ensure that new-immigrants are able have a safe environment to live in.

II- DHS Should Not Require a Child's Presence When a Family with Children Applies for Shelter

Int. No. 0123-2024, precluding the Department of Homeless Services (DHS) from requiring a child's presence when a family with children applies for shelter, is an extremely necessary and welcome change. Since the beginning of the COVID-19 crisis, DHS has temporarily allowed families with children to apply for shelter at the Prevention Assistance and Temporary Housing (PATH) without their children present. This change must be made permanent.

Prior to COVID-19, families with children applying for shelter would spend ten to twenty hours in PATH every time they applied. Having a policy that mandates that children spend 10-20 hours in an office necessarily precludes them from regularly attending school. It has been well established that students experiencing

homelessness test well behind their housed peers.<sup>1</sup> Forcing these children to be present at PATH instead of being at school only widens this disparity.

Unfortunately, we are not talking about one missed day of school. Families applying for shelter at PATH must provide a complete history of all the places they have lived for the last two years, as well as a third-party contacts to verify that the family actually lived in those locations. For those families experiencing chronic homelessness, this burden is especially onerous. If the verification contacts provided do not answer the phone, or DHS cannot speak with them within 10 days, then the client is found ineligible for shelter for “not cooperating” with the investigation and the family must reapply for shelter. Reapplying entails restarting the process from the beginning by having the entire family (including the children) return to PATH and spend another 10-20 hours completing a new application for shelter, typically identical to the prior application, and then waiting on-site for a new temporary shelter placement. Their children would miss a day of school every 10 days, forcing them to fall further and further behind housed children.

Prior to COVID-19, this happened frequently to my clients, and, for some families, this would occur every 10 days for months before DHS could verify their housing history. In April of 2024, only 54% of families with children who applied for

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<sup>1</sup> Institute for Children, Poverty and Homelessness, *Disparities in Academic Achievement* (“Of the 40,000 homeless students who were of testing age, less than 25% scored high enough to be considered at grade level on either exam, compared to approximately 40% of housed students. Even when homeless students perform at grade level early in their education, they tend to see their academic performance decline faster than that of their housed classmates in later years.”) <https://www.icphusa.org/reports/disparities-in-academic-achievement/#overview>.



DHS shelter were found eligible, and those other 46% had to reapply.<sup>2</sup> That same month, 31% of the families that were found eligible had applied two or more times, and 5% of the families that were found eligible had applied five or more times.<sup>3</sup> Prior to the pandemic those children would have had to spend days sitting in the PATH office, instead of attending school. This is an unacceptable hardship for children experiencing homelessness.

Missing school is only part of the problem for children. Many clients reported that it was almost impossible for them to meet their children's needs for engagement and nutrition for the many hours they had to spend at the PATH office. Clients struggled because the families were provided limited food and there were no outlets to charge their phones or other devices so their children could be kept busy or engaged with remote learning while they waited. They were also warned not to leave lest they lose their place in line. None of these factors create an appropriate environment for children.

Moreover, applicants for family shelter must provide extremely detailed accounts for why they cannot currently stay at any of the places where they have resided for any length of time during the last two years. Often, the reasons a family cannot stay at a prior residence include sensitive topics such domestic violence and abuse. Most of my clients do not want their children to have to hear about disturbing and painful personal experiences, nor should they have to. I have had clients who found the eligibility process so traumatizing and degrading that they put their

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<sup>2</sup> [https://www.nyc.gov/assets/operations/downloads/pdf/temporary\\_housing\\_report.pdf](https://www.nyc.gov/assets/operations/downloads/pdf/temporary_housing_report.pdf)

<sup>3</sup> [https://www.nyc.gov/assets/operations/downloads/pdf/temporary\\_housing\\_report.pdf](https://www.nyc.gov/assets/operations/downloads/pdf/temporary_housing_report.pdf)

children into kinship foster care or opted for unsafe housing to avoid it. This is the worst of all outcomes.

Int. No 0123 would codify a temporary policy that has alleviated the many stressors of bringing children to PATH. This would be a welcome and hugely helpful change, and NYLAG urges this Council to do so.

### III- Placing Intake Navigators at PATH Would Facilitate Homeless Families in Achieving Stability

Int. No. 0124-2024, mandating intake navigators at PATH to provide information and support to families going through the application process, is essential to assist families in being found eligible and eventually transitioning to permanent housing. As explained in more detail above, so many NYLAG clients seeking family shelter in DHS are found serially ineligible. This is because the application process for DHS family shelter unnecessarily confusing, onerous and burdensome. When a homeless family with children finds themselves in need of shelter, they must present for intake at the PATH intake center in the Bronx. While there, the family must provide a complete history of all the places they have lived for the last two years, as well as third-party contacts to “verify” that the family actually lived in those locations. Even in cases where a family has experienced street homelessness, the family is required to account for their whereabouts for each day during the prior years, primarily by providing statements from witnesses who observed the family “living” at those locations, such as an automobile, subway car, or public park. The family is then given a pre-investigative emergency 10-day placement while DHS attempts to “verify” the provided housing history. DHS attempts to contact or re-contact each owner, primary

tenant, or witness in connection with each application. If the verification contacts provided do not answer the phone, or DHS cannot speak with them within 10 days, then the client is found ineligible for shelter for “not cooperating” with providing a “complete, accurate and verifiable housing history” and the family must pack up their belongings, leave their shelter placement, and reapply for shelter. **Most NYLAG client families who have been found ineligible do not even know why their application was denied.**

Returning to the DHS intake center to re-apply for shelter is a process that may take up to 20 hours. Families must resubmit the same documents and report much of the same information that was already submitted on prior applications. Applicants have to miss work and keep their children home from school, as they do not know whether they will be able to leave the intake center in time to pick their children up. The family is then awarded a new 10-day placement while their new application is reviewed, but not necessarily in the same location as the prior 10-day placement. Many families repeated this scenario successively every 10 days, which made it almost impossible for families to plan commutes to school, work and day care, endangering their jobs and their children’s education. Some NYLAG clients in this circumstance were subject to ACS investigations based on educational neglect because their children were not able to attend school on a consistent basis, both because they had to spend 1 out of every 10 days in the PATH office and also because they would be assigned to a different location with no way to get to school.



Families who are deemed ineligible for shelter are not eligible for the programs that assist homeless families' transition to permanent housing (particularly the CityFHEPS rental assistance supplement). Without this assistance, families are unlikely ever to gain the means to leave the shelter system and thus the ineligibility finding effectively traps them in the shelter system. This is particularly problematic because life in shelter takes an enormous toll on the wellbeing of a homeless family. Most often families will not be placed near family support or in a familiar neighborhood. Children are often required to commute for hours or transfer to new schools, and family members must travel long distances on public transportation to continue treatment with trusted doctors and therapists. Periodic shelter transfers render it impossible for a family to achieve stability by establishing roots and becoming part of a community and are particularly destabilizing for children.

Providing navigators to assist homeless families with the DHS application process would only help these families reach stability more quickly, and NYLAG enthusiastically supports this measure.

#### IV- Public Benefits Eligibility Specialists are Key to Transitioning to Permanent Housing

NYLAG wholeheartedly supports Int. No. 0440-2024 mandating the provision of public benefits eligibility specialists at every DHS shelter. As I have frequently seen first-hand, it is almost impossible for people to transition out of shelter and into permanent housing without public benefits and/or a rental subsidy (which in itself is a public benefit). Shelter staff, caseworkers, and even sometimes housing specialists, simply do not understand shelter residents' eligibility, particularly when those

residents are immigrants. This lack of understanding causes people to languish in shelter for far too long. For instance, in City Fiscal Year 2022, the average length of stay in the DHS shelter system was 412 days for single adults, 437 days for families with children, and 750 days for adult families.<sup>4</sup>

I have seen time and time again situations where people are eligible for certain benefits and vouchers but cannot access them without finding a lawyer or paralegal to advocate on their behalf. The provision of public benefits eligibility specialists on-hand would be a great boon to access benefits and to reduce the length of stay for people in shelter.

V- Int. No. 0453-2024 and Int. No 0460-2024 Creating Additional Intake Options for Families with Children Experiencing Homelessness Will Increase Access to Shelter and Reduce the Trauma of the Application Process

Int 0453-2024 would require the DHS to establish additional intake centers for families with children in boroughs without existing intake centers. Currently, the only way for a family with children to access shelter is by applying at the Prevention Assistance and Temporary Housing (PATH) center in the Bronx. One intake site is wholly insufficient for a city of our size. For example, in April of 2024, 4,483 families applied at the PATH center for shelter.<sup>5</sup> And my clients who have applied at PATH overwhelmingly report waits of 10+ hours while they wait on line and engage in the application process.

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<sup>4</sup> <https://www.coalitionforthehomeless.org/basic-facts-about-homelessness-new-york-city/#:~:text=In%20City%20Fiscal%20Year%202023,off%20the%20streets%20since%201981.>

<sup>5</sup> [https://www.nyc.gov/assets/operations/downloads/pdf/temporary\\_housing\\_report.pdf](https://www.nyc.gov/assets/operations/downloads/pdf/temporary_housing_report.pdf)

Many families who find themselves needing shelter have no familiarity with the Bronx and must navigate hours of public transportation to reach the intake site. Long journeys to PATH and lengthy stays in the PATH office only exacerbate the trauma these families are already facing, including trauma stemming from the sudden or gradual loss of one's home.<sup>6</sup> Additionally, many people experiencing homelessness, particularly women, become homeless after experiencing physical and sexual abuse and its consequent psychological trauma.<sup>7</sup> The application process for shelter should seek to reduce, not exacerbate, the families' trauma, and expanding intake locations to every borough would support this goal.

Allowing community non-profits to process shelter applications would reduce trauma for families with children even further. Int. 0460-2024 would require DHS to report on the feasibility of partnering with community-based nonprofit organizations to accept and process applications for shelter intake for families with children. This model would capitalize on existing relationships, and it will undoubtedly reduce trauma for families, as well as inefficiencies in the current shelter application process. Many of my clients are connected with local social services agencies that assist them with applying for and recertifying their public benefits. These agencies already have many of the documents clients need to apply for shelter. Moreover, these agencies are located in the communities where clients reside prior to

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<sup>6</sup> *Homelessness as Psychological Trauma*, Lisa Goodman, Leonard Saxe (1991)

<sup>7</sup> *Id.*



experiencing homelessness. Clients and their children are already comfortable in these offices, which would make the shelter application process far less stressful.

We thank the Committee on General Welfare for the work you have done to facilitate services for vulnerable New Yorkers, and for taking this opportunity to continue to improve the conditions for our clients. We hope we can continue to be a resource for you going forward.

Respectfully submitted,

New York Legal Assistance Group



## **Testimony for NYC Council Committee on General Welfare June 12, 2024**

I am Michelle DeMott, and I am the Vice President of External Affairs at Samaritan Daytop Village. First, thank you to Diana Ayala, Chair of the Committee on General Welfare, and committee members for your continued support during these challenging times. Samaritan Daytop Village (SDV) is a nationally recognized human services organization that provides comprehensive services to more than 33,000 people annually through a network of over sixty facilities primarily located in the five boroughs of New York City. SDV offers a rich array of programs, including treatment for mental health issues and substance use disorder, transitional and supportive permanent housing, as well as innovative services for veterans, homeless individuals, women, children, youth, seniors, and families.

**Our testimony will focus the Children and Families who are in the NYC Homeless Shelter System or at risk of becoming homeless. In this year's budget, we're calling for expanding funding to help these populations prevent homelessness.**

### **Increase Funding for Homeless Prevention of Children and Families**

The current housing crisis in New York City is reaching unprecedented levels, with over 60,000 individuals experiencing homelessness on any given night, mindful that does not include the mass influx of asylum seekers and the strain that has been placed on the availability of services. This crisis disproportionately impacts families and children, with over 105,000 students in New York City Public Schools currently unhoused. It is imperative that we not only continue to invest but also expand funding in Homeless Prevention Council initiatives such as the Children and Families in the NYC Homeless Shelter System, ensuring we can provide them with a safe place to reside and the necessary resources to support their education and well-being.

Samaritan Daytop Village has been a leading provider of services for homeless families, currently serving over 2,000 children daily in our 10 Transitional Family Residences. As a result of ongoing NYC Council Funding, the enhanced programs that we can provide allow us to create and offer a positive learning environment and opportunities for children to thrive, ultimately improving their overall mental health and emotional well-being.

Samaritan Daytop Village tirelessly serves families and children who face homelessness and the overwhelming challenges of the social determinants of health. Every day, we witness the profound impact that mental health and physical health services have on the lives of our city's most vulnerable children. It is with this firsthand experience that we urgently advocate for the expansion of these critical services, recognizing that a holistic approach is paramount to their overall well-being and academic success.

Children living in unstable environments grapple with issues far beyond the classroom. They endure the daily stress of housing insecurity, often compounded by untreated physical and mental health conditions. Without addressing these fundamental needs, we inadvertently set them up for academic struggles and lifelong disadvantages. Expanded mental health services are crucial in providing these children with the emotional resilience and stability needed to thrive in their educational pursuits. Similarly, ensuring access to comprehensive physical health services addresses both immediate health concerns and fosters long-term wellness, which is indispensable for sustained academic engagement and success.

We respectfully request the continued and enhanced funding for programs that integrate mental and physical health services with educational support. Investing in these comprehensive services not only supports the immediate needs of these children but also cultivates a healthier, more educated, and more equitable future for our city. By prioritizing the holistic needs of our most vulnerable, we can break the cycle of poverty and homelessness, giving every child the opportunity to reach their full potential. Thank you for your dedication to the well-being of New York City's children and for considering our heartfelt appeal.

Samaritan Daytop Village is grateful for your continued support, and we hope to count on the NYC Council to fight to expand funding for Children and Families at risk of becoming homeless. I thank you on behalf of our agency and clients. We look forward to continuing to be on the front lines in partnership with you and your communities, serving the most vulnerable New Yorkers.



**Council before the NYC Council Committee on General Welfare**  
**Oversight: Families with Children in DHS Shelters**  
**June 11, 2024**

**Introduction and Thanks:** My name is Catherine Trapani, and I am the Assistant Vice President for Public Policy for Volunteers of America-Greater New York (VOA-GNY). We are the local affiliate of the national organization, Volunteers of America, Inc. (VOA). I would like to thank Chair Ayala and members of the Committee for the opportunity to submit testimony for this hearing.

**About Us:** VOA-GNY is an anti-poverty organization that aims to end homelessness in Greater New York through housing, health and wealth building services. We are one of the region's largest human service providers, impacting more than 12,000 adults and children annually through 70+ programs in New York City, Northern New Jersey, and Westchester. We are also an active nonprofit developer of supportive and affordable housing, with a robust portfolio permanent supportive housing, affordable and senior housing properties—with more in the pipeline.

The following testimony will focus on how our clients experience the intake process for Department of Homeless Services (DHS) family shelter and, the programmatic needs of our residents.

**Background:**

VOA-GNY has been providing shelter services to homeless families since 1991 when DHS first began contracting with nonprofits to do so. We operate five transitional housing programs for families in the New York metropolitan area which serve more than 430 families: Bushwick Family Residence and Legacy Family Residence, both located in Brooklyn, University Family Residence and Lydia E. Hoffman Family Residence, both located in the Bronx, and Regent Family Residence located in Upper Manhattan. We also operate three "Sanctuary" shelters designed for newly arrived families seeking asylum, also under contract with DHS serving an additional 244 families.

**DHS Family Shelter Intake and Eligibility:**

As we have previously testified before this committee, the families we serve in our traditional Tier II family shelters are referred to us from the PATH intake facility in the Bronx. When a family applies for shelter at PATH, they are assigned a temporary shelter placement while they await a final determination of eligibility. Such families are labeled as "conditional", not yet eligible for full services or housing assistance pending a determination of the department that they are truly homeless. Once deemed eligible they can remain in their shelter placement and begin planning for independent housing. During the conditional period, families are prohibited from applying for permanent housing assistance such as City FHEPS and, are often reluctant to take steps to set up services like daycare, training, employment



and more given that there is no guarantee they will be remaining at the shelter for longer than what is supposed to be a 15-day eligibility review period. Historically, when the review period was 15 days or less, the impact of being “conditional” was minimal. However, over the past few years, our staff has noticed that the intake process has become more arduous for our families and have noted an increase both in the number of families conditionally placed in our family shelters and, the amount of time families remain in this conditional status. This has resulted in people not being able to move forward with their journey towards stability for several months and has diverted considerable staff time and resources away for permanency planning as we work to help families establish eligibility for services.

Across our five DHS family shelter programs approximately 20% of our shelter capacity is occupied by families who are in conditional status, not yet considered truly eligible for DHS shelter. Most of the families in our care who have this status have re-applied multiple times in an effort to establish their eligibility with one household having reapplied 12 times and counting remaining “conditional” for more than 6 months. That’s six months of not being able to apply for housing assistance, six months of being unsure how long their children would be able to reasonably commute to the local school and, six months of not being able to set up daycare, healthcare, workforce or other community services for fear of being uprooted and having to start all over again.

If a family receives an ineligibility notice, they have two days to reapply before the system logs them out of the conditional placement completely at which point they are not allowed to return to the shelter they’ve been staying at and must return to PATH to start the process from scratch and await placement at a new shelter. It is incredibly difficult to prove a negative – that there is no other place to go – and sometimes, the lack of an address, the thing that makes one eligible for shelter is the very reason one can’t prove where they were previously staying resulting in frequent denials. While we appreciate the enormity of the City’s obligation to provide shelter for everyone who needs it and the need to reserve this resource for those truly in need, this paradox of proving a negative often means that our families and staff spend hours working to obtain records from utility companies, letters from family, friends and employers, searching through old mail or anything else that could establish their whereabouts for every single night in the preceding two years and explaining why none of those placements are available to them going forward to establish eligibility.

Acknowledging the difficulties inherent in the reapplication process, DHS instituted a rule that allowed families to reapply for shelter without having their children present to spare children the long waits and allow them to attend school while their parents navigated the reapplication process. This rule, however, does not work well in practice given how many hours a parent must spend at the PATH while their reapplication is being evaluated. In fact, the system is so broken that availing oneself to the option to send children to school while a parent reapplies can have disastrous consequences.

One family attempting to reapply for shelter learned that the hard way when she was stuck waiting for the agency to reassign her to a temporary placement in our shelter for so many hours that she missed school pick up for her children. School and shelter staff were unable to reach her because she did not have a working cell phone. Shelter staff picked up her children from school on her behalf, sure that the parent was simply running late at PATH and tried several times to reach someone at DHS who could verify that the parent was still going through the intake process. Hours passed and the shelter childcare area closed; staff’s attempts to reach DHS, calling all four numbers available to us at the PATH center were still unanswered. Shelter staff continued to call DHS and took the children upstairs to the family’s

temporary shelter placement apartment and cooked them dinner. Hours more passed and staff began to fear for the parents' safety calling area hospitals, checking the news and looking for any information that could help locate the parent even as they continued to try and reach someone at PATH. Finally, as it was nearly midnight when the third shift had arrived and the children were exhausted, staff, all of whom are mandatory reporters for child abuse and neglect, had no choice but to report the parent missing to police and ACS. The children were removed and placed into crisis care for the night. At 1am, the parent disembarked from a DHS bus dropped off at the shelter only to find her children already gone. She had been in the City's care the entire time but was not permitted to use the phone to call her children or the shelter and, was told if she left PATH she would be denied shelter and logged out of the system. The City never made any effort to inform the team at the shelter what was happening and never returned any of our calls or picked up the phones at PATH. She was able to get them back in her care the following day with the support of the shelter staff but, the trauma of losing them for the night and their experience of being taken away by police and ACS will continue to haunt both the family and our staff who tried valiantly to avoid that kind of situation.

Given this experience, we cannot at present endorse **Int. 123** which would preclude DHS from requiring heads of household to bring their children to PATH to apply for shelter. Unless we are absolutely sure the parents have reliable childcare arrangements or PATH significantly reforms its processes to process shelter eligibility quickly, we are not comfortable recommending to anyone that they apply for shelter without their children with them given our experiences. Instead, we would recommend reforming other aspects of the intake process first, prioritizing navigation services as suggested by **Int. 124**, opening new intake centers in other boroughs to reduce burdens on families entering shelter from boroughs other than the Bronx (**Int. 453**) or, exploring how and if other trusted CBOs could guide families through the eligibility process (**Int. 460**). We would further note that because staff at DHS family shelters are mandatory reporters and must contact ACS in cases where they suspect neglect, parents must be allowed to communicate with the shelter where their children are residing to keep staff apprised of their whereabouts throughout the shelter re-application process. It is hard to conceive of the desperate choice facing parents who remain at PATH well into the evening without their children: risk losing their ability to stay in shelter if they leave PATH or remain at PATH unsure of their children's whereabouts and safety while they continue the intake process.

The arduous intake process delays a family's ability to regain a sense of stability, earn an income and apply for rental assistance while diverting staff resources and time to supporting family claims of eligibility. The utility of this resource intensive process is difficult to grasp when instead, we could be spending that time helping people access supports and move forward. We sincerely appreciate the Council's efforts to improve this process.

#### **Services in DHS Family Shelters:**

Families residing at VOA-GNY family shelters learn essential skills that enable them to meet the challenges of everyday life. By promoting responsibility and independence, families gain valuable knowledge and experience that will last long after permanent housing has been found.

All of our DHS family residences offer 24-hour security, on-site childcare, classrooms and recreational space for the families we serve, who are given their own apartment. Residents at our "Sanctuary" shelter facilities reside in hotels that were converted to accommodate their needs with common spaces in the lobbies set aside for recreation and some hotel rooms converted to social services suites. At both site

types, a full range of supportive services provides the help a family needs to ultimately find and retain a home of their own.

Our goals are to:

- Create a safe haven for families in transition
- Guide families toward self-sufficiency through intensive case management services
- Ensure children are enrolled in and attend school
- Help families locate permanent housing within 6 to 9 months of entering the residence
- Connect clients to follow-up services to ensure families successfully transition out of the shelter system

VOA-GNY offers a full complement of social services for families in our shelters including

- **Case Management:** Case managers work with families to develop a comprehensive service plan and provide information, advocacy and referrals to the services they need, including ongoing supportive counseling and benefits.
- **Housing:** A full-time housing specialist assists families with locating and securing permanent housing. Information and workshops on the topics of financial problem-solving, adult living skills and tenant rights are also offered.
- **Children's Services:** On-site, interactive educational activities and recreation are available, enabling parents to focus on securing employment or housing, and participate in educational or health programs.
- **Education:** Representatives from the Department of Education help enroll children in school and monitor daily attendance, acting as a liaison between the school and family.
- **Medical Care:** Comprehensive medical and mental health services, including preventative, primary and specialist services, are available through the William F. Ryan Community Health Center. Psychiatric referrals are made as needed.
- **Client Care Coordinators (Social Workers):** This unit enhances existing program services at our family residences to streamline and centralize the admission process. Under the supervision of a licensed clinical social worker in charge of health innovation across VOA-GNY's programs, the Client Care Coordinator at each shelter develops a biopsychosocial with all families entering the shelter, and assists them in creating an Independent Living Plan. Identifying the needs of each family member allows us to develop an intervention plan for the whole family that addresses barriers that may be precipitating factors to the family's current need for temporary housing. Families receive referrals to community services, assistance with identifying triggers, and strategies to cope with stressors to achieve stability and permanent housing.
- **Employment:** A full employment assessment is conducted for each resident and on-site support is available including assistance with resume writing and interviewing. Skills training, job placement and GED preparation are available through referrals to local community programs.

We are deeply appreciative of the Council's commitment to quality care in our shelters, however, past attempts to legislate staffing patterns have resulted in unfunded mandates that providers like VOA-GNY struggle to uphold. For example, last year, the Council passed a mandate for onsite therapy and related

mental health services that is currently being implemented with no new dollars to do so. This is creating a strain on already stretched program budgets where salaries are scarcely sufficient to attract and retain unlicensed staff and we are working hard to examine how we can move dollars around, re-assign staff or come up with some other cost-neutral way to meet the new mandate.

Similarly, **Int. 440** would mandate shelters to designate eligibility specialists at each site. We agree that benefits access and eligibility is a critical component of any resident's independent living plan. Those services are already available at our shelters and provided by existing members of the social services team, mainly the case managers and housing specialists. Were the Council to require a separate staff line to specialize in this work outside of a funded initiative, it is not clear how the mandate would enhance services to residents in our care. If passed with no new funding, this introduction could create a mandate that would ultimately reduce the headcount of case managers who assist not only with benefits but a host of other service needs. While some may argue that benefits are complex and specialization could be helpful, for families using our services it would mean that they would have to establish a relationship with another staff member and add a new appointment to their busy calendars to focus on only one aspect of their independent living plan. Our model relies upon skilled case managers who are fluent in multiple systems and service areas and are able to address families' needs holistically.

An alternative to legislating specific required functions would be to use the budget negotiation process to restore PEGs that DHS family shelter programs were previously forced to absorb. Most recently DHS shelter providers absorbed a 2.5% PEG that chipped away at our progress to strengthen our workforce.

Looking historically not just at the current administration but tracing back how the service model has changed over several different mayors, there have been many PEGs over the years that eroded the service dollars available to support homeless families. During the Bloomberg administration PEGs resulted in the loss of dedicated employment specialists, onsite medical care, certain recreation programs and other initiatives. The de Blasio administration made some efforts to restore what was lost under Mayor Bloomberg. In 2017 DHS created a model budget that allowed for one staff line at each family shelter in addition to the standard case managers and housing specialists that could be used flexibly depending on the providers' model for recreation or other programming. Under Mayor de Blasio, DHS also added the Client Care Coordinator line to provide social workers at DHS family shelters. However, the model budget did not establish living wage salaries or even salary parity across programs such that the funding for these positions remain low; attracting and retaining qualified staff remains a challenge. The COLA that the Council successfully negotiated with Mayor Adams is a step in the right direction and we are grateful however, more work needs to be done to right-size salaries to establish parity between nonprofit and DHS shelter staff and ensure that nonprofit providers have the funding necessary to maintain our workforce. We urge the Council to restore the 2.5% PEG and continue to pursue opportunities to increase nonprofit worker wages.

#### **Closing:**

We are grateful for the opportunity to walk through some of the challenges associated with the shelter intake process and our work to support families in our shelter programs. We look forward to working with the Council and Administration to continue to improve the experience of families in our care. Thank you for the opportunity to testify. Should you have any questions, I can be reached at [ctrapani@voa-gny.org](mailto:ctrapani@voa-gny.org).



Respectfully submitted by Catherine Trapani, Assistant Vice President of Public Policy, Volunteers of America-Greater New York

**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)

Name: Joslyn Carter

Address: 33 Beaver Street NY

I represent: Dept of Homeless Svcs

**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: 6/11/24

(PLEASE PRINT)

Name: Joslyn Carter, Administrator

Address: \_\_\_\_\_

I represent: DSS/DHS

Address: \_\_\_\_\_

**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: 6/11/24

(PLEASE PRINT)

Name: Will Watts

Address: \_\_\_\_\_

I represent: Coalition for the Homeless & Legal Aid Society

Address: 129 Fulton St. NY, NY

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: 06/18/2024

(PLEASE PRINT)

Name: Abraham Xavier Johnson

Address: \_\_\_\_\_ NY, NY 10030

I represent: ME

Address: MYSELF

**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)

Name: Maya Jasinska

Address: \_\_\_\_\_

I represent: Win - Women In Need

Address: \_\_\_\_\_

**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)

Name: Catherine Tapane

Address: \_\_\_\_\_

I represent: Volunteers of America Greater New York

Address: \_\_\_\_\_

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**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: 06/11/2024

(PLEASE PRINT)

Name: Manchester River

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**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: 06/11/2024

(PLEASE PRINT)

Name: Angela Cerda

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**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)

Name: Chloe Smith

Address: [Redacted] NY NY

I represent: Children's Health Fund; Healthy + Ready to Learn

Address: 925 River Side Drive NY NY



**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 0123 Res. No. \_\_\_\_\_

in favor     in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Juan Diaz

Address: \_\_\_\_\_

I represent: Citizens Committee for Children

Address: 17 Wall Street

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. 911 Res. No. \_\_\_\_\_

in favor     in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Deborah Berkman

Address: NY

I represent: New York Legal Assistance Group

Address: 100 Pearl St., NY NY 10004

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**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: 06/11/24

(PLEASE PRINT)

Name: Dr. Xenex Z. Rivera

Address: \_\_\_\_\_

I represent: HOUSING SOLUTIONS OF NY

Address: 488 E 116th Street Bx NY

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: June 11, 2024

(PLEASE PRINT)

Name: Sharon Brown

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: Jamaica NY 11436

Please complete this card and return to the Sergeant-at-Arms