

Testimony of John Rojas, Chief Special Services Officer, New York City Human Resources Administration, New York City Department of Social Services
Oversight: Supporting Domestic Violence Survivors in NYC's Shelter System
before the New York City Council Committee on General Welfare and the Committee on Women and Gender Equity

October 9, 2024

Good morning Deputy Speaker Ayala, Chair Louis, and members of the Committee on General Welfare and the Committee on Women and Gender Equity. My name is John Rojas and I serve as the Chief Special Services Officer at the Human Resources Administration (HRA) within the Department of Social Services (DSS). My portfolio, among other things, includes oversight of the City's domestic violence shelter system. I would like to thank the committees for the opportunity to testify today on our work to support survivors of domestic violence that are experiencing homelessness. I am joined by my colleagues Rima Rivera, Deputy Commissioner, Domestic Violence Services, HRA, and Aqueelah Winston, Deputy Commissioner, Shelter Intake and Assessment, Department of Homeless Services (DHS), and by Jennifer DeCarli, Deputy Commissioner for Family Justice Center Operations and Survivor Services, the Mayor's Office to End Domestic and Gender-Based Violence (EndGBV).

As you are aware, October is Domestic Violence Awareness Month – giving us all an opportunity to lift up survivors, their loved ones, survivor advocates, and our shared communities' efforts as we work to create the positive change we must continually pursue. We salute their work and I welcome the opportunity to update the Council on our initiatives to support survivors of domestic violence in the domestic violence shelter system.

I would like to begin by sharing information with anyone in the public who may need help – if you or someone you know is experiencing domestic or gender-based violence, help is available. The NYC 24-Hour Domestic Violence Hotline is 1-800-621-HOPE; you can reach the Human Trafficking Resource Center at 1-888-373-7888; the NYC Gay and Lesbian Anti-Violence Project at 212-714-1141; and Barrier-Free Living, with a focus on assisting individuals with disabilities, at 212-533-4358. We understand the importance of centering the client, client family needs, and strive to be a resource linking survivors of domestic violence to culturally competent care during their time of need.

We welcome the opportunity to share our work to ensure survivors have access to a safe living environment and trauma-informed services – both within the shelter system and as they safely transition to community.

HRA administers the largest domestic violence shelter system in the country. The emergency domestic violence shelter system consists of 54 confidential facilities throughout all five boroughs – comprised of 42 emergency shelters and 12 family transitional shelters (Tier II). There are 2,290 emergency domestic violence shelter beds, which serve both individuals and families; there are 628 family (transitional) shelter units open systemwide. The emergency beds provide trauma-informed shelter services to domestic violence survivors who are at immediate risk. Only domestic survivors who are stabilized in the emergency system can be transferred to the Tier II shelters. In FY24, the HRA domestic violence system served 11,231 adults and children in emergency and family transitional shelters.

Shelters serve as an entryway to further services and assistance, including childcare services, housing assistance, benefit entitlement assistance, financial development service, and economic empowerment programs. Shelters also serve as an entry point for expressive therapies (art, play, recreational), stress reduction skills techniques, mental health/substance use counseling, and community-based medical providers.

Having provided that overview, I will now share an overview of intake, the array of services and linkages to care shelters provide, and the pathway to greater independence and safe moveout.

There are three pathways to intake. One pathway is through the Safe Horizon hotline. Survivors can connect with advocates to receive services, counseling, and information about available resources to maintain their and their families' safety; support can include crisis counseling, safety planning, information and resources, and assistance finding domestic violence shelters.

A second pathway is through No Violence Again (NoVA) screening at DHS' Prevention Assistance and Temporary Housing (PATH) intake center, Adult Family Intake Center (AFIC), or single intake center. A third pathway to intake is through a community-based referral – that can be local police precincts, neighborhood hospitals, Family Justice Centers, DV non-residential community providers, or other social service providers.

DV Emergency Shelter Providers are required to provide several essential services:

- Hotline Services include crisis intervention counseling, information, and referrals, including referrals to other available residential programs when the facility is at capacity.
- Safe and Secure Housing – shelters are required to offer housing with appropriate security measures, including safety locks and 24-hour security; housing must be clean and provide basic amenities.
- Supportive Services include case management services, counseling, support groups, advocacy, and assistance obtaining social services.
- Child Care and Education – services should include arrangements for childcare, offering age-appropriate recreational and social activities on a daily basis during regular business hours for children residing in the facility, the provision of appropriate counseling services to children residing in the facility, and educational support for children of survivors.

- Medical Services, meaning providers establish linkages with accredited medical institutions or clinics with qualified medical personnel (e.g. physician, nurse practitioner) for health examinations, follow-up visits, and mental health services.
- Transportation, meaning to the extent possible, arranging for transportation to the facility in an emergency; and making transportation available to residents in order for the residents to secure legal, medical, housing, employment, or public assistance services or assist residents to obtain available public or private transportation where possible.
- Referrals to other social service supports – that may be legal services, on-site or in-community education and outreach activities.

New York State OTDA regulations mandate that within ten days of admission to shelter, the provider and adult members of the resident family must develop an independent living plan (ILP). ILPs must be reviewed with the family at least once every two weeks and revised, as necessary, to assist the family in obtaining permanent housing. We are cognizant of the fact that in the sphere of human services, and particularly with respect to the individuals and families surviving DV, one size does not fit all. The services offered, including housing and benefits assistance, financial development, economic empowerment programs, mental health and substance abuse counseling, and childcare – whether provided on-site or through partnerships – are a key element in a pathway towards greater independence and moveout.

New York State imposes time limits on emergency DV shelters. Survivors have 90-days, then the potential for a 45-day extension, and then the potential for a final additional 45-day extension – meaning a NYS imposed maximum of 180 days in emergency DV shelter.

The 1.4% vacancy rate, coupled with the 180-day maximum emergency DV shelter limit, means that we do have exits from DV emergency shelter to DHS shelter. We are continually working to ensure that transition is as seamless as possible. That means bolstering our system to allow for more warm handoffs and establishing the back-office links so a housing shopping letter does not fall away in the transition from DV emergency shelter to DHS shelter. I can report that in 2025 we plan to make even further progress in strengthening the HRA-DHS links to provide even more robust support to survivors making that transition.

We operate under a regulatory framework that includes New York State and federal laws that seek to uphold the safety, privacy, and standards of service to our clients. The New York State Domestic Violence Prevention Act of 1987 requires counties to provide shelter and services to survivors of domestic violence; further, it establishes funding for these programs. The New York State Office of Children and Family Services (OCFS) promulgates regulations for licensure and the standards for the establishment and maintenance of residential and non-residential domestic violence programs. The New York State Office of Temporary and Disability Assistance (OTDA) authorizes DSS/HRA to administer the financial and contractual requirements of the domestic violence Tier II system. In addition, federal law also provides parameters for our operations, and the shelters, programs, and services we administer including the Family Violence Prevention and Services Act (FVPSA), the Violence Against Women Act (VAWA), and the Victims of Crime Act (VOCA).

We keep this regulatory framework in mind in service delivery and in examining legislative proposals.

Turning to the legislation under consideration at today's hearing, File number 2572 is an amendment to existing Local Law 83 of 2018, where DSS reports annually on "exits from domestic violence emergency shelters." File number 2572 would expand the current reporting requirements on exits from domestic violence shelters to include both domestic violence emergency shelter exits as well as domestic violence tier II shelter exits. This report would also be required monthly.

File number 2573 is a further amendment to Local Law 79 of 2022 (which was previously modified pursuant to Local Law 103 of 2023). File number 2573 would amend the existing reporting requirements regarding multi-agency emergency housing assistance to include reporting on applications for domestic violence emergency shelters and applications for domestic violence Tier II shelters by household size.

All reporting legislation, including legislation that amends existing local law mandated reports, requires careful consideration to assess for both the feasibility and the capacity to produce the report in a timely, accurate manner. What may appear, at surface level, as minor alterations to capture more information in preexisting reports, may ultimately require significant adjustments to workflows, IT systems, and processes. That is why we would like to continue a discussion with the Council beyond this hearing with a view to amending the parameters of this proposed legislation in a manner that best aligns with our ongoing obligations to uphold clients' privacy, our capacity to produce this information, our capability to report in a timely manner, and our ability to ensure the accuracy of data to truly reflect the metrics a given report aims to capture.

In terms of New York State legislation, I would like to draw the Council's attention to A. 2583-A / S. 15-A (Hevesi / Gounardes), legislation that would, "[authorize] certain shelters for victims of domestic violence to be reimbursed for any payment differential for housing a single individual in a room intended for double occupancy where a single occupancy room is not available." In the previous state legislative session the bill passed both houses and is pending approval by the Governor. We strongly encourage signing of this bill into law. In New York City, this legislation would increase the City's capacity to house single adult survivors of domestic violence.

I will conclude by expressing gratitude to our staff, our provider partners, and the stakeholders, including survivors, survivor advocates, and residents of our communities who are working to keep a keen focus on domestic violence and the further steps we can take to keep our fellow New Yorkers safe. As I said earlier, one size does not fit all – we are continually learning and taking onboard the insights you as a Council, the community of stakeholders, and public hearings like this offer.

Thank you for the opportunity to testify today. We look forward to your questions.



JUMAANE D. WILLIAMS

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL COMMITTEE ON
WOMEN AND GENDER EQUITY AND COMMITTEE ON GENERAL WELFARE
OCTOBER 9, 2024**

Good morning,

My name is Jumaane D. Williams and I serve as the Public Advocate for the City of New York. Thank you Chair Louis and Chair Ayala and members of the Committee on Women and Gender Equity and the Committee on General Welfare for holding this hearing and allowing me the opportunity to provide a statement.

Over the past four years, we have witnessed the devastating impacts of the COVID-19 pandemic across a range of pressing issues which, unfortunately, includes rates of domestic violence. From 2020 to 2022, NYC Hope, the city's domestic violence hotline, received almost 273,000 calls. This is a substantial increase of almost 15% each year, compared to the total numbers of calls received in 2019. Also, between 2021 and 2022, 15,000 of those calls requested shelter. Evidently, the amount of calls received are significantly higher than pre-COVID.

The Mayor's Office to End Domestic and Gender-Based Violence (ENDGBV) released a report in 2023 that found that domestic violence homicides increased almost 30% between 2021 and 2022.¹ The increase from 2021 to 2022 is even more disturbing in the Bronx, with a 57% increase, and in Brooklyn with a 225% increase.² From 2010-2022, 31.2 % of those affected by domestic and intimate partner homicides were Black women, who made up 13% of the city's population.³ 27.3% of those affected by domestic and intimate partner homicides were Hispanic women, who made up 14.6% of the city's population.⁴ The data show that women of color are disproportionately at risk to domestic and intimate partner homicide.

One of the most urgent concerns from domestic violence victims is accessing safe and affordable housing. Domestic violence continues to be one of the main factors of family homelessness in New York City.⁵ New York City has been in a perpetual housing and homelessness crisis, with New Yorkers suffering from skyrocketing rents with no increase to the minimum wage, communities of color experiencing evictions, and tenants dealing with predatory landlords. In 2023, 39% of families with children entered shelters because of domestic violence.⁶ Our shelter's population is at an all time high right now, with the homeless

¹ <https://gothamist.com/news/domestic-violence-deaths-are-rising-in-nyc-especially-among-women-of-color>

² <https://www.nyc.gov/assets/ocdv/downloads/pdf/2023-Annual-FRC-Report.pdf>

³ Ibid.

⁴ Ibid.

⁵ <https://newdestinyhousing.org/wp-content/uploads/2023-NYC-Policy-Priorities-final.pdf>

⁶ Ibid.



JUMAANE D. WILLIAMS

population reaching the highest levels since the Great Depression.⁷ I believe, as advocates for the unhoused across the City believe, that our system is failing domestic abuse survivors and their children. Families may constantly move from shelter to shelter with very little to no chance of receiving permanent housing. Based on a report released by the New Destiny House, the number of survivors leaving the shelters for permanent housing has decreased by 18% from 2018-2023.⁸ Due to the lack of affordable and safe housing, this is a huge barrier for survivors of domestic violence to leave abusive households. It is crucial that we uplift the voices of survivors and make sure they have access to resources that protect them.

In June 2020, ENDGBV launched an emergency financial relief program for domestic and gender-based violence survivors. The microgrants covered rent, utility bills, and moving costs. While these grants did improve different aspects of the 377 clients' lives⁹ who received the grants, advocates emphasize this program is underfunded, which, compared to the numbers cited above, seems significantly so.¹⁰ I would like to hear more about updates on this program and if the administration plans to meet the \$6 million demand for fiscal year 2025.

Furthermore, earlier this year, the administration announced a pilot program called Project Home, which connects domestic violence survivors with permanent housing.¹¹ The program was set to serve 100 families with children who have been living in shelters. During today's hearing, I hope to hear updates by the administration regarding Project Home. I hope we can learn more from survivors and advocates about their recommendations for improvements.

We must continue to support and affirm survivors of domestic, gender-based, and intimate partner violence. Although we have seen much progress, survivors are still facing barriers and it is our duty to bridge the gap.

Thank you.

⁷<https://www.coalitionforthehomeless.org/basic-facts-about-homelessness-new-york-city/#:~:text=Homelessness%20in%20NYC%3A%20The%20Facts.homeless%20families%2C%20including%2045%2C745%20children.>

⁸ <https://newdestinyhousing.org/wp-content/uploads/DV-Report-1.pdf>

⁹ <https://www.nyc.gov/assets/ocdv/downloads/pdf/Emergency-Financial-Relief-Microgrants-Program-Evaluation-Summary-Report.pdf>

¹⁰ <https://gothamist.com/news/nyc-offering-housing-grants-for-domestic-violence-survivorsbut-advocates-say-program-is-underfunded>

¹¹ <https://ny1.com/nyc/all-boroughs/news/2024/04/15/pilot-program-connects-domestic-violence-survivors-permanent-housing>



Breaking the Cycle of Homelessness
for Women and their Children

Testimony of Win on Supporting Domestic Violence Survivors in the NYC Shelter System for the General Welfare and Women and Gender Equity Committees Hearing October 9, 2024

Thank you, Chair Ayala and Louis and the esteemed members of the Committee on General Welfare and Committee on Women and Gender Equity, for the opportunity to submit testimony on behalf of Win. My name is Chris Mann, and I am the Assistant Vice President 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.

Domestic violence remains a leading cause of homelessness for families with children in New York City, surpassing evictions and overcrowding. In Fiscal Year 2023, 20.3% of families with children entering Department of Homeless Services (DHS) shelters cited domestic violence as the primary cause of their homelessness, compared to 11.1% who entered due to evictions and 11.2% who entered due to overcrowding. More than 1 in 5 families with children in the DHS system—2,911 families—identified domestic violence as the reason for their homelessness.[\[i\]](#) At Win, we see the impact of domestic violence on families daily. Ninety percent of the families we serve are headed by women, and many of them have fled abusive situations in search of safety and stability for their children. The trauma of domestic violence, compounded by the challenges of homelessness, creates an intergenerational crisis. Research shows that boys who witness their mother’s abuse are 10 times more likely to abuse a partner as adults, and girls who grow up in abusive homes are more than six times as likely to experience sexual abuse than those who grow up in non-abusive environments. Among families with children in DHS shelters, over 16% of heads of households were themselves in shelter as children.[\[ii\]](#)

In addition to those in the DHS system, thousands more survivors sought refuge in the Human Resources Administration (HRA) domestic violence shelter system. In calendar year 2023, 10,842 survivors entered HRA domestic violence shelters, a slight increase from 2022. Alarming, the vast majority of these individuals are children: in 2022, 58% of the HRA domestic violence shelter population was under 18, and 28% were children under 5—the largest single age group.[\[iii\]](#)

Despite this immense need, we are facing significant gaps in housing options for survivors of domestic violence. The number of households leaving HRA domestic violence shelters for permanent housing has dropped by 18% between 2018 and 2023. Of the 2,284 survivor-led households who exited emergency shelter in 2023, 50% moved to another shelter rather than permanent housing: 24% entered the already overburdened DHS system, and 26% went to Tier II domestic violence shelters. Only 9%—a mere 208 households—secured permanent housing.[\[iv\]](#) With such limited housing options, survivors are often forced into a cycle of shelter-to-shelter movement because of arbitrary shelter stay limits in the DV system. This instability is devastating for families seeking safety and a chance to rebuild their lives.



Breaking the Cycle of Homelessness
for Women and their Children

This is why Win supports T2024-2573 A Local Law to amend the administrative code of the city of New York in relation to reporting on demand for domestic violence emergency and Tier II shelters. Accurate data is critical for understanding the scope of the crisis and ensuring that resources are aligned with the demand. We fully support the intent of the legislation to better understand the number of applications that are successful and unsuccessful to both emergency and Tier II domestic violence shelters. Having accurate data on demand for domestic violence shelter would provide a clearer picture of where the system is falling short and guide more effective interventions. However, we have some concerns about how the data would be sourced due to the non-centralized nature of referrals and intakes. Therefore, reporting on demand should utilize existing publicly available data where possible. Although less comprehensive, this approach could still provide valuable insight into the demand for domestic violence shelter. If the determination is made that additional data is required, careful consideration should be made to ensure that data collected provides an accurate representation of domestic violence shelter demand without adding undue burden to the organizations making referrals and conducting intake into the system.

Win also endorses T2024-2572, which would amend the administrative code to expand reporting on exits from domestic violence shelters. As the New Destiny report highlights, far too many survivors are cycling through the shelter system rather than moving into permanent housing. This bill's focus on tracking exits—whether to permanent housing, other shelters, or potentially precarious situations—will offer crucial insights into the barriers survivors face in securing stable, long-term housing. Improved reporting will enable policymakers and service providers to target resources more effectively, ultimately increasing the number of survivors transitioning to permanent homes.

We commend Chair Ayala for introducing these critical pieces of legislation and urge the Council to pass them. The data collected under these bills will provide an essential foundation for improving services for domestic violence survivors and addressing the interlocking crises of domestic violence and homelessness.

Additionally, we urge the council to pass resolution 363 introduced by Council Member Gale Brewer, which calls on the state to pass S8493/A9129. The state legislation would end the harmful impacts of shelter limits, codifying the existing right to shelter in the DHS system, while also establishing a right to shelter across all shelter systems in NYC. Codifying the right to shelter would not only ameliorate the harms of arbitrary time limits in shelter but would allow persons to receive shelter and related services in the system best suited to their individual needs.

Thank you for your attention to this urgent issue. We look forward to continuing our partnership with the City to ensure that survivors of domestic violence, and their children, can access the safe and stable housing they need to rebuild their lives.



Breaking the Cycle of Homelessness
for Women and their Children

[i] New Destiny Housing. *A Shelter is Not Enough: The Urgent Need for Safe, Affordable Housing for Domestic Violence Survivors in New York City*. New York: New Destiny Housing Corporation, 2023. <https://newdestinyhousing.org/wp-content/uploads/DV-Report-1.pdf>.

[ii] Ibid

[iii] Ibid

[iv] Ibid

HOUSING MORE NEW YORKERS

Systemic issues afflicting housing voucher programs and an overview of the simple policy proposals that can solve them

Overview

There are currently over 150,000 New Yorkers without a home and more than 175,000 households at risk of eviction and potentially homelessness across New York State.¹

Housing vouchers in New York City are pivotal in mitigating homelessness, increasing housing stability, and improving long-term health, social, and economic outcomes for adults and children. However, New York City's current housing voucher programs are flawed, and voucher holders regularly find their housing opportunities limited.

The policy conversation around vouchers covers a wide array of stakeholders in addition to voucher holders themselves, including social service providers and real estate industry professionals. Win and REBNY co-authored this report to leverage our collective insights and experiences with the challenges facing the City's voucher programs. We all share a common goal: Improving the voucher process and helping voucher holders find stable housing.

To that end, our organizations agree that policy changes must be made to:

- Reduce delays that prevent voucher holders from securing housing.
- Eliminate confusion and inconsistencies regarding voucher programs.
- Move past outdated processes and utilize a digital portal to improve the process.
- Enhance outreach and coordination to prevent source-of-income discrimination.
- Streamline the City's affordable housing lottery to get voucher holders into new units faster.

Acknowledgements

Developed by Women In Need (Win) and the Real Estate Board of New York (REBNY).

Authors

Kate Goldmann

Basha Gerhards

Henry Love

Christopher Mann

Ryan Monell

Special Thanks

Neil Garfinkel

Sarah Saltzberg

Rachel Fee

Erin Garrett

Jason Ryan



Introduction

Since its implementation in 2014, CityFHEPS has supported nearly 150,000 New Yorkers in 63,000 households.²

Housing vouchers are pivotal in mitigating homelessness, increasing housing stability, and improving long-term health, social, and economic outcomes for adults and children.³ In New York City, tenant-based housing voucher programs work to address a challenge many New Yorkers face – equitable access to housing. New York City administers several housing voucher programs, which vary depending on how they are funded. Some vouchers, like Section 8, are run by local public housing agencies that receive funding from the U.S. Department of Housing and Urban Development (HUD). Other programs, such as CityFHEPS, are run by the Department of Social Services, which includes the Department of Homeless Services (DHS) and the Human Resources Administration (HRA). Functionally, housing vouchers provide rental assistance to low-income individuals and families, people with disabilities, and the elderly. Vouchers enable recipients to pay for private market housing units, as public housing authorities (PHAs) and other administering agencies provide assistance directly to the property owner on behalf of the recipient. In practical application, however, New York City’s housing voucher programs are flawed, and voucher holders regularly find their housing opportunities limited. New York City must address the persisting barriers within the bureaucracy of administering the various voucher programs, as the city’s acute housing shortage and growing homeless population add urgency to this reform. As New York City’s housing crisis grows and policymakers continue to turn to voucher programs as a vehicle for housing access, it is imperative that the programs work effectively. Voucher-holding apartment seekers need to be on an equitable plane as all other apartment seekers.

New York’s tenant-based voucher programs can be transformative for many individuals and families, but various pain points often undermine their success. Voucher program performance directly impacts human well-being. A study published by the National Library of Medicine found that voucher programs improve health outcomes for families and children, provide access to better neighborhood opportunities, and advance health equity.⁴ A study by Johns Hopkins University and Tufts University faculty echoes this, finding measurable health and related benefits ensuing to families who received vouchers, although half of those voucher holders only lived in their dwelling for about one year or less.⁵ However, REBNY frequently hears from members – owners and agents – working with prospective tenants eligible for or utilizing vouchers that the process has proven cumbersome, lengthy, and convoluted. Time sensitivity has been particularly lackluster. In many instances, apartments have been lost for no reason other than processes that should take no more than a few days ended up

Almost 100,000 households use Section 8 vouchers in New York City.⁶

taking months. In addition, inefficiencies within the city's Affordable Housing Lottery, which is responsible for housing many voucher holders, perpetuate lease-up challenges and result in unnecessary costs for property owners while units sit vacant and considerable costs for the city incurred through prolonged shelter stays.

While there are several short-term interventions New York City should pursue to address some of the deficiencies shared by various voucher programs, long-term structural programmatic change is needed. To begin to address these challenges, the administration should explore process mapping of the voucher administration process to identify bottlenecks and understand payment flows. Additionally, public housing authorities (PHAs) and other administering agencies should pursue reforms to housing intake and digitization processes to inform the legislative ideas further detailed below.

As an aside, but equally important from a policy perspective, we must consider city and state supply-side challenges because vouchers are demand-side financial incentives. Recognizing the inherent constraints in New York City's housing production, we urge the creation of long-term strategies to address supply issues, such as an as-of-right tax abatement for new multifamily rental construction. Supply-side interventions will expand the universe of units available to voucher holders, but the absence of such tools should not constrain program success. Even in a constrained rental market, apartments are still available, as proven by year-over-year increases in CityFHEPS voucher utilization.⁷

Until these challenges are effectively remediated, it is hard to see how voucher programs, even when expanded, could be utilized to their fullest potential. At a time when the housing and homelessness crises become more dire, it is paramount for all stakeholders to come together to identify tangible solutions.

Throughout this report, we will detail some of the most critical challenges that must be addressed. In the end, this report aims to create equity amongst voucher-holding apartment seekers and all other apartment seekers – equity that fails to exist today.

Table of Contents

Problems & Solutions

pg. 07	Administrative Delays
pg. 11	Challenges with Technology and Personnel
pg. 15	Issues with Payment Standards
pg. 19	Source of Income Discrimination
pg. 21	The Affordable Housing Lottery

Existing Legislative Solutions and Conclusion

pg. 25	Solutions
pg. 26	Conclusion

References

pg. 27	Appendix
pg. 29	Notes



1

ADMINISTRATIVE DELAYS

Inspections often face scheduling delays and inconsistency in evaluation criteria, prolonging the time it takes voucher holders to move into housing. Staffing shortages within relevant agencies further exacerbate these challenges, leading to extended wait times and decreased voucher utilization rates despite increased voucher issuances.



1

Administrative Delays

“After failing a previous inspection under Section 8 (NYCHA), the unit was fixed but failed again due to an open trash can lid on the fifth floor and chipped paint in the fire stairs on the 16th floor.”

To secure permanent housing through a voucher program, voucher holders must navigate a complex bureaucratic process that differs from program to program. Administrative challenges typically arise before voucher issuance, and data shows that application processing times have considerably increased over the past several years. According to the 2024 Mayor’s Management Report (MMR), the median time between completion of a Section 8 voucher application and issuance increased by almost 120% between FY22 and FY23.⁴ This increase reflects lease-up trends shared by all voucher programs, directly impacting rental assistance recipients experiencing or at risk of homelessness.

After a voucher holder finds a unit, the applicable agency, depending on the voucher program, will assign the voucher holder a case manager and initiate an inspection for Section 8 vouchers or an apartment walkthrough for CityFHEPS vouchers. Unfortunately, inspections can take several weeks to schedule. Case managers often delay or cancel inspections, and the absence of well-defined tools and inspection parameters creates inconsistency. For instance, a unit might fail an inspection for a violation that is not immediately hazardous, such as a two-degree variation over or under the targeted hot water temperature. In contrast, another unit with more critical health and safety issues might pass.

Due to the prolonged nature of inspections and other administrative factors such as pre-clearance and application processing, property owners with prospective voucher-holding tenants are commonly asked to hold units open for unreasonable amounts of time, sometimes up to five months. In comparison, the lease signing process typically takes a matter of days for New York City’s private market tenants, enabling them to move into the given unit within one month.

Challenges with administrative procedures, such as inspections, are exacerbated by resource and staffing deficiencies. As stated by New York City’s PHAs in a letter to Mayor Adams, the Department of Housing Preservation and Development (HPD) was short almost 500 positions, the Department of Buildings (DOB) was short 449 positions, the Department of Homeless Services (DHS) was short 234 positions, and the Human Resources Administration (HRA) was short 2,614 positions in January of 2023.⁵ With depleted case manager workforces, the city’s PHAs struggle to manage clients and move them into available housing. According to the 2024 MMR, HPD issued 65% more Section 8 vouchers in the first four months of FY24 compared to the same FY23 period. However, HPD’s voucher utilization rate decreased due to higher attrition rates.

Solutions

According to the 2024 Mayor's Management Report (MMR), the median time between completion of a Section 8 voucher application and issuance increased by almost 120% between FY22 and FY23.⁸

The New York City Council should pass legislation requiring program mapping and reporting data on the success rate of voucher holders entering housing. Along with measuring the success rate, reporting should also examine the average time it takes for a voucher holder to enter housing across the programs administered, where there were delays, and what the causes were.

For programs established by the City where they have authority to establish inspection requirements, the City Council should pass legislation that codifies the ability for inspections and apartment walkthroughs to be done virtually and to focus primarily on public health and safety requirements associated with the building code. Requirements unrelated to life and safety concerns where the space otherwise meets code requirements related to bedroom size, heating and cooling temperatures, and other essential prerequisites to quality and safe housing should be waived, at least if there is a housing emergency. More significant issues, such as evidence of rodents, complete lack of heat, evidence of lead paint, and the like, should continue to result in a failed inspection.

- Alternatively, for CityFHEPS vouchers, DSS should amend Chapter 10 of the Rules of the City of New York to distinguish between non-immediately hazardous violations and those related to life and safety concerns in apartment pre-clearance and walkthrough procedures. DSS should also pursue a rule change to allow CityFHEPS inspections to be completed virtually.
- Similar steps should be taken for Section 8 programs and others administered by the federal or state government, and the City Council should encourage these steps.

The City Council, via legislation, should also formalize inspection processes and develop a hierarchy of issues, not all of which will result in an inspection failure. This intervention will reduce inconsistencies in inspection procedures and permit tenancy in apartments without immediately hazardous conditions.

HRA should introduce rules requiring that apartment walkthroughs be completed within seven days. If HRA chooses not to implement new rules, the City Council should require via legislation that inspections be completed within seven days and that any reinspection occur within seven days following an owner or manager rectifying any outstanding issues.

The City Council should exempt new construction from inspections, as the Department of Buildings (DOB) has already inspected these units. This approach empowers tenants to report potentially hazardous conditions in rental units, expediting individual apartment lease-ups. Similarly, the PHAs should be

After receiving a Section 8 or CityFHEPS voucher, recipients only have 120 days to find housing.⁹

required to pre-qualify new construction buildings and common spaces to speed up the leasing process further.

DSS should commit to creating and publishing a corrective action plan to resolve the systemic delays in processing CityFHEPS applications. In addition, the City Council should require the timing of housing voucher application approvals to be at most fifteen days, which effectively mirrors the longest a private sector application will ever take. From the time of application approval by the property owner, move-ins (or, at a minimum, first payment and lease start) should occur within thirty days.

Identifying and resolving obstacles without tracking and maintaining key data is challenging. Going forward, the City Council should require the MMR to include lease-up time for all housing voucher programs as an annual reporting metric. This low-cost intervention will foster transparency in housing outcomes and facilitate the identification of inefficiencies in existing lease-up procedures.



CHALLENGES WITH TECHNOLOGY AND PERSONNEL

Challenges include confusion over required documents, application rejections for minor reasons, and lack of consistent communication among involved parties, leading to prolonged lease-ups and frustration for both voucher holders and property owners.

2

Challenges with Technology and Personnel

“The unit passed inspection... After another several weeks of reaching out and excuses, the landlord rented the unit to a different tenant and the deal was canceled more than 60 days after it passed inspection. This was all due to caseworker error and CityFHEPS inefficiency.”

After an individual meets the eligibility requirements for a housing voucher and a case manager approves the documentation, voucher holders, depending on the program, receive housing search assistance from a housing specialist in their shelter. However, this assistance is often inadequate, making it more challenging for the individual to find a property owner who will accept their voucher.

Upon completing the pre-clearance and inspection process, the case manager must compile the client’s application so DSS can determine the client and the chosen unit’s eligibility. The case manager is responsible for collecting and ensuring accuracy across all application components, which needs to be filled out by the voucher holder, case manager, broker, and property owner. If the case manager does not complete the application promptly, the voucher holder risks losing their unit. At this stage, there is often case manager and client confusion over required documents, which should be completely unacceptable if it leads to housing being secured for the voucher holder – which it often does.

After submission to DSS, applications are frequently sent back to the case manager for small, nonsensical reasons. When the case manager returns the application upon making the requested corrections, it is reviewed by a new member of DSS, who may identify new issues. This back-and-forth process can significantly delay lease-ups and lead to monetary loss for the property owner.

Caseworker turnover exacerbates process bottlenecks. This occurs when a caseworker does not support a prospective voucher-eligible tenant from start to finish. High turnover directly impacts placement success, as there is common inconsistency across caseworkers regarding how they facilitate transactions.

Throughout the placement process, applicable parties struggle to maintain shared visibility with each other to understand pain points or deliverables. Because there are inconsistent contact points across the various agencies involved in voucher programming, it becomes difficult to clearly communicate what is needed to move the tenant forward. There is also an absence of a clear point of contact for property owners or real estate agents when issues arise with clients or tenants. When property owners or agents need support while completing the application or for missed rent payments, seeking a resolution becomes frustrating and time-consuming.

Due to the slow rollout of the current system, most landlords are still not able to get paid electronically.

Technology and staffing constraints also impact tenants' abilities to renew their vouchers. Many voucher holders fail to receive annual recertification notifications or any confirmation of their recertification despite multiple attempts to file the necessary paperwork. When renewal applications are not processed, voucher holders do not receive their aid, leading to terminated benefits or eviction and missing rent payments for the property owner. In an article published by THE CITY, an HRA caseworker stated that tenants often become aware their vouchers did not get renewed through a notice they are behind on rent.¹⁰ Starting in December of 2023, CityFHEPS recipients could renew CityFHEPS vouchers and check the status of their case online using DSS's benefits portal, ACCESS HRA. Although this portal will make it easier for voucher holders to check their benefits, it does not address the need for shared visibility, as property owners cannot access it.

Of course, adequate staffing and agency funding are often a prerequisite for these solutions. As city fiscal challenges remain, ensuring that funding is robust for voucher programming will more than pay for itself. We encourage the Fiscal Year 2025 budget to deeply consider the needs not only for the voucher programs as they exist today but as they could exist if the solutions being provided are implemented.

Solutions

The City should enforce and comply with Local Law 118, passed in 2020, which requires that the status of rental assistance applications and renewal requests be available online to the applicant or provider.¹¹ All documents should be updated on the online portal, modernizing the current lengthy application process. This technology has been used in real estate for years (Board Packager, Onsite, etc.) and should be adopted to help streamline and expedite voucher processing.

The Council should require that each voucher program establish a public portal where owners and agents can seek the support they need. To achieve this, agencies must boost resources and increase staffing.

- Currently, DSS directs CityFHEPS clients to their Access HRA portal or mobile application to access voucher application information and updates. However, services on this portal do not extend to property owners. Alternatively, NYCHA, the administering agent for Section 8 vouchers, oversees a self-service portal that voucher holders and property owners can access. Like NYCHA, DSS should expand this portal to property owners.

In December 2023, WIN had more than 70 families who were eligible for shopping letters, but had not yet been approved because of a backlog at DHS. Many of those requests had been submitted with updated paperwork as many as five times with no response, delaying those families housing search by weeks and sometimes months.

The Council should require that each voucher program make a voucher holder checklist accessible that clearly communicates all the necessary paperwork to the recipient. Applicable agencies must ensure that materials are universally accessible and available in all languages. This intervention will reduce the chances of incomplete or incorrect applications, strengthen voucher-holder confidence, and expedite lease-up.

DSS should create a Direct Access Line phone number for voucher holders, property owners, and community partners to address and facilitate case error correction.

HRA should adopt amendments to Chapter 10 of the Rules of the City of New York that establish provisions relating to caseworker-client proceedings in CityFHEPS transactions. These rules should require that the same caseworker be assigned to a tenant for the entire lease-up process. If the agency chooses not to pursue rule amendments, the Council should enact legislation to require that the same caseworker be assigned to a tenant from voucher issuance until move-in. In instances where a caseworker leaves their position, the program administrating agency should be required to notify the tenant, owner, and others involved in the transaction with the name and contact information of the new caseworker.

Real estate brokers and agents are often brought into a housing transaction by owners, tenants, or the programs themselves. Usually, outcomes are better when an agent can assist with what is often a convoluted and challenging process. **To ensure agent participation, their fee should be equitable to what is charged in a cash-paying transaction (15% of annual rent), and there should be assurance that a fee is paid within 30 days of securing a unit for a tenant.** The programs should also be required to pay the fee in most instances.

3

ISSUES WITH PAYMENT STANDARDS

Existing “rent reasonableness” provisions, delayed payments to property owners, technological issues, and instances of PHA failure to pay rent further exacerbate challenges, risking eviction for voucher holders. Additionally, delays in obtaining furniture vouchers under programs like CityFHEPS add to post-lease-up complications.



3

Issues with Payment Standards

“We had an incident where a check was being sent to the wrong address and, despite multiple follow ups and assurances that it had been fixed, it continued to go to the wrong address.”

After the applicable agency receives a voucher holder’s application, the agency will conduct a “rent reasonableness” test, in which the New York City Housing Authority (NYCHA) and the Department of Housing, Preservation, and Development (HPD) are required by HUD to ensure that rents charged by owners to program participants are reasonable relative to similar units in the area. While this ensures that the city is not overpaying for the unit, it can cause clients to miss apartments narrowly. In addition, what has been determined to be a reasonable rent often fluctuates throughout the process, creating even more complications. For instance, property owners have been told that an asking rent meets the established rent payment standard only to be asked to lower the asking rent later in the process under the guise of “rent reasonableness.”

Similarly, tenants are often denied housing because individual caseworkers determine that the rental rate is too high for a particular unit without accounting for amenities, location, and other considerations for rent value. As a result, this policy only undercuts the work done to raise the voucher values to fair market rent and the Administration’s work to offer augmented rent value, so voucher holders have more choices to live in a broader range of neighborhoods.

Voucher holders have also lost housing opportunities for a subset of apartments operated by not for profits with amended regulatory agreements under Section 610 of the Private Housing Finance Law. Section 610 permits certain not-for-profit owners of affordable housing projects subject to regulatory agreements to collect rents that exceed the legal, regulated rent without impacting the amount the tenant pays.¹² For example, this legislation would apply to some property owners with Section 8 assistance who may be able to collect additional rent subsidy based on Section 8’s rent rules, but have registered, lower, legal rents on the property that constrain the amount of collectible subsidy. Unfortunately, there have been instances where caseworkers determine the voucher holder is not eligible for a unit with an amended regulatory agreement that permits the collection of full subsidy rents above the lower legal rent. This issue is emblematic of the systemic challenges at administering agencies, where training is absent when new rules take effect.

Once a voucher holder is placed in a housing accommodation, owners and agents regularly fail to receive payments in a reasonable amount of time. Sometimes, delayed payments are due to the City’s poorly functioning technology systems.

Tenants are often denied housing because individual caseworkers determine that the rental rate is too high for a particular unit without accounting for amenities, location, and other considerations for rent value.

There are also instances where the City fails to pay its share of rent payments for voucher holders. In February 2023, a Harlem property owner filed 54 Housing Court cases after months and years of unpaid rent. Individuals and families using housing vouchers should not face eviction due to government or program failure.¹³

Under some voucher programs, like CityFHEPS, eligible tenants needing additional assistance may receive an allowance for furniture. However, many tenants encounter post-lease-up delays in obtaining furniture vouchers.

Solutions

The City Council should pass clarifying legislation to ensure that the dollar amount on the voucher presented at the time of the application is honored. If a voucher amount needs to be lowered, there is often the opportunity to ensure that the voucher can still be honored so long as the reduced amount requested is presented to owners within a reasonable amount of time (i.e., 24-48 hours).

Households using vouchers must contribute up to 30% of their income on monthly rent. The voucher subsidy covers the remainder of the rent. **The City Council and State Legislature should enact legislation requiring a study of voucher program participants' income after contributing 30% towards monthly rent payments.** This study would help determine whether the 30% standard is appropriate, given that 100% of a voucher holder's income is insufficient to support themselves in New York City.

DSS should adopt amendments to Chapter 10 of the Rules of the City of New York, requiring a dedicated point of contact to be available and accessible to all stakeholders in a housing transaction involving a voucher where there are instances of nonpayment. If DSS chooses not to pursue a rule amendment, the Council should enact legislation requiring a dedicated point of contact to be established to resolve instances of nonpayment. Initial and monthly payments should be issued on time, and property owners should receive prompt responses to inquiries.

Federal, state, and city legislation should be enacted to ensure that the share of rent due from a voucher is paid monthly within the first five days of the lease start date, as does a cash-paying tenant. The program would incur the same fees if payments were not made within the same time as a cash-paying tenant. The tenant would not incur fees for the agency or city share.

"Section 8 said the unit was too expensive, but the client was willing and able to pay the 10% rent overage that is permitted in the program. Still, Section 8 refused the deal, stating that the rent was too high."

The Council should enact legislation requiring a study to be facilitated to consider a master lease pilot program based on a rapid rehousing model used in Los Angeles, California. With this model, the City could lease entire buildings and consequently sublease each unit to whomever they desire. Master leasing can take many forms. For example, New York City could offer incentives to property owners in exchange for agreements to rent to certain tenants the city wants to see housed. Master leasing accelerates the rate at which unhoused individuals are moved into permanent housing, bypassing the challenges encountered in the housing voucher system.

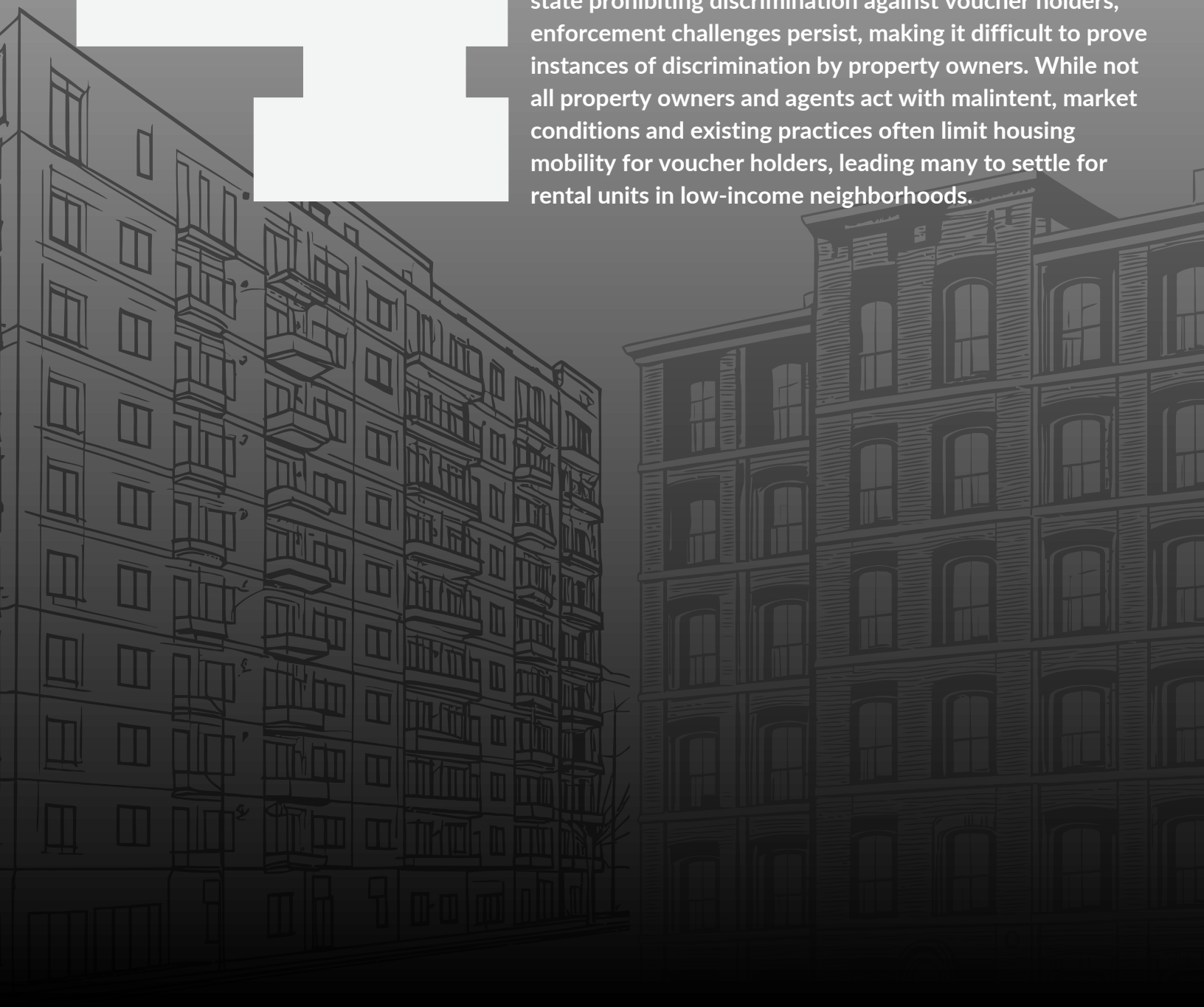
- DSS may also adopt rules amending Chapter 10 of the Rules of the City of New York concerning a master lease pilot program for CityFHEPS vouchers.

DSS should adopt amendments to Chapter 10 of the Rules of the City of New York, requiring that furniture vouchers are made available to tenants no later than five days after a lease is signed. If DSS chooses not to pursue a rule change, the City Council should enact legislation establishing this five-day timeframe.

4

SOURCE OF INCOME DISCRIMINATION

Despite anti-discrimination laws in New York City and the state prohibiting discrimination against voucher holders, enforcement challenges persist, making it difficult to prove instances of discrimination by property owners. While not all property owners and agents act with malintent, market conditions and existing practices often limit housing mobility for voucher holders, leading many to settle for rental units in low-income neighborhoods.



4

Source of Income Discrimination

The NYC Commission on Human Rights settled a case after allegations that a property management company would not complete paperwork required for Section 8, requiring that the owner to set aside 5 apartments for voucher holders, post the Commission's "Notice of Rights" posters, and pay complainant emotional distress damages.¹⁴

In 2008, New York City passed Source of Income anti-discrimination laws, prohibiting property owner discrimination against vouchers, among other legal sources of income.¹⁵ Similarly, in 2019, the State of New York amended the New York State Human Rights Law to prohibit discrimination based on lawful source of income.¹⁶ Although discrimination against voucher holders is illegal, some property owners practice it due to inadequate enforcement or proof of such behavior. For example, if a unit receives multiple applications, proving that the property owner deliberately chose a cash-paying applicant is challenging. Despite instances of discrimination against voucher holders, it is crucial to note that not all property owners and agents are acting with malintent. This is particularly true in geographies like New York City, where supply is at a low and demand is high.

Housing vouchers are designed to be inherently flexible, empowering low-income families and individuals to find housing in their chosen neighborhoods. However, existing agency practices, policies, property owner behaviors, and housing market conditions routinely prevent greater mobility for voucher holders.

Solutions

The NYC Human Resources Administration Source of Income (SOI) unit, NYC Commission on Human Rights (CCHR), NYS Division on Human Rights (DHR), and the NY State Attorney General's Office enforce SOI protections. Coordination between these city and state agencies must improve, as information exchange is crucial in identifying trends, increasing public awareness, and preventing the recurrence of discriminatory behaviors.

The Council should enact legislation requiring outreach initiatives to educate voucher holders about their rights, and help owners, managers, and agents understand the available resources to help service tenants and clients. In addition, the City should require annual public reporting on SOI complaints and the average time it takes to resolve a complaint.

In 2023, HPD committed \$3.1m to go towards combatting source of income discrimination.¹⁷ HPD and other PHAs will use the funds to identify, develop, and enact new strategies to combat discriminatory behavior. **The City Council should consider expanding upon this funding stream for the FY25 budget cycle**

*The NYC Commission on Human Rights has resolved over 350 cases of source of income discrimination in the past two years.*¹⁸

CCHR has historically been underfunded and understaffed, making it significantly more challenging to combat discriminatory housing practices and meet the needs of voucher holders. The Fiscal 2024 Executive Plan includes an additional \$1.3m and seventeen new positions for the department's SOI unit.¹⁹ However, CCHR only filled three of the thirteen allocated positions before the city-wide hiring freeze went into effect. **Thus, the Council should maintain the funding committed in the Fiscal 2024 Executive Plan and exempt CCHR from the ongoing hiring freeze.**

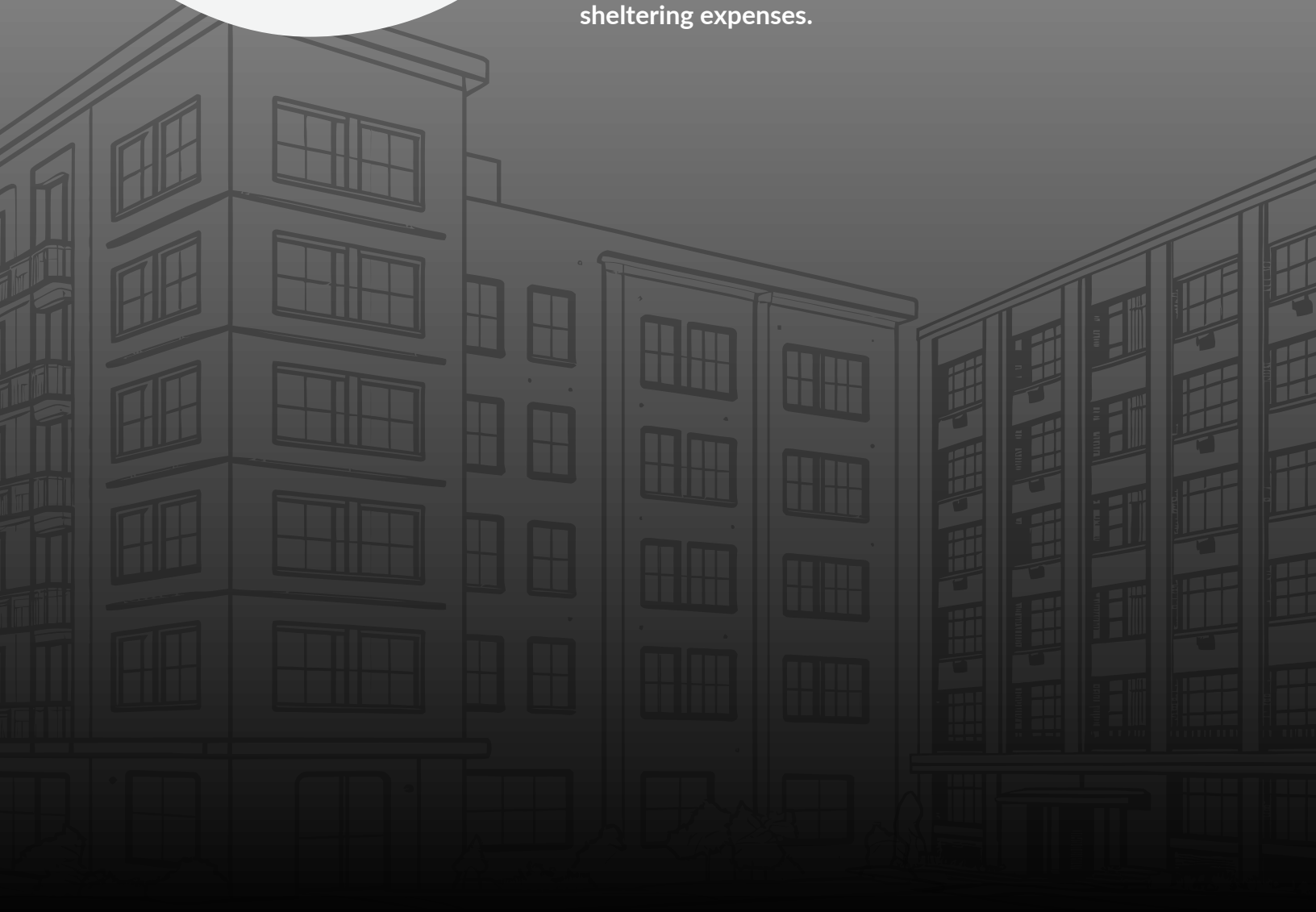
CCHR should establish a comprehensive penalty structure that imposes higher penalties than what currently exists for instances of proven SOI discrimination. At a minimum, penalties should incorporate a monetary fine, mandate a set aside of the violator's holdings specifically for voucher-holding tenants, and require that the property owner or management company train all staff of the NYC Human Rights Law.



5

THE AFFORDABLE HOUSING LOTTERY

New York City's affordable housing lottery, NYC Housing Connect, plays a significant role in housing voucher placements. Still, its lease-up processes have become increasingly lengthy, with the median time for applicant approval rising by approximately 53% between Fiscal Years 2022 and 2023. Staffing shortages, burdensome application requirements, and inefficient processing contribute to these delays, costing the city significant amounts in sheltering expenses.



5

The Affordable Housing Lottery

According to the latest MMR, the median time to complete applicant approval for a project filling its units through the affordable housing lottery increased from 171 days in Fiscal Year 2022 to 262 days in Fiscal Year 2023, representing an approximate 53% increase.²⁰

New York City's affordable housing lottery, NYC Housing Connect, is responsible for a large share of housing voucher placements. However, the lottery's existing lease-up processes have profound implications for the timely placement of individuals into permanent housing. According to the latest MMR, the median time to complete applicant approval for a project filling its units through the affordable housing lottery increased from 171 days in Fiscal Year 2022 to 262 days in Fiscal Year 2023, representing an approximate 53% increase.²¹ The MMR also reports that the share of lottery projects that completed applicant approvals within six months fell 10% between Fiscal Years 2022 and 2023. As aforementioned, HPD and New York City's other PHAs are experiencing considerable staffing challenges. Staffing shortages, unduly burdensome application requirements, and inefficient processing will continue to increase lease-up timelines until adequately addressed. According to a report released by Mayor Adams, it cost the city over \$8,700 per month in 2022 to house a family of two in shelter.²² Based on this estimate, a 91-day increase in applicant approval time from 2022 cost the city an additional \$26,100 to house a family of two in shelter.

A 2023 Citizens Housing & Planning Council analysis echoes these trends, stating that the full lease-up of a lottery's units takes an average of 13.5 months (lottery durations are calculated based on 95% of units leased) and that one in three lotteries started marketing after a project received a Certificate of Occupancy (CO).²³ Prolonged lease-up times directly impact voucher holders. For many individuals, lengthy waiting periods could result in being evicted from an existing housing accommodation or entering a homeless shelter.

Solutions

The Council should enact legislation establishing a pilot to initiate lotteries during project construction and prior to completion to reduce the length of vacancy and lease-up for habitable units. According to Comptroller Brad Lander's review of DSS's programs and services, clients who leave shelter for a housing option with subsidized rent fare much better.²⁴ Based on placements one year prior, the Fiscal Year 2022 average subsidized return rates were less than 5% for single adults and less than 1% for adult families and families with children. This requires an agency rule change.

A 91-day increase in applicant approval time from 2022 cost the city an additional \$26,100 to house a family of two in shelter.

The mayor can mandate the inclusion of additional key performance indicators such as rent-up volume, lottery timelines, homeless set-asides, and supportive housing units into the MMR (CHPC Housing Connect Analysis), or the City Council could require through legislation that these indicators are included in a separate report.²⁵ There are currently reporting requirements enacted through local law, but there is no single collection on how the programs perform.

Federal, state, and local governments should unite to streamline regulations and eliminate duplicative or contradictory guidance to ease administrative burden. For example, PHAs should evaluate an applicant's required paperwork for Housing Connect to better understand the breadth of administrative burden (CHPC Housing Connect Analysis).²⁶ Congress should establish a task force to evaluate how these intergovernmental regulations can be streamlined.

SOLUTIONS AND CONCLUSION



Existing Legislative Solutions and Conclusion

A report released by Mayor Adams reveals that it costs the city over \$8,700 per month in 2022 to house a family of two in shelter. Alternatively, a CityFHEPS voucher to house this family would cost a maximum of \$2,387 or less per month.²⁷

Existing Solutions

On May 25, 2023, the New York City Council passed a package of bills to expand tenant-based housing voucher eligibility requirements and facilitate client movement through the system.

- Intro 878-A removes shelter stay, the “90-day rule,” as a precondition to CityFHEPS eligibility.
- Intro 893-A expands CityFHEPS eligibility, removing specific DSS criteria for determining eligibility and broadening accessibility to a broader range of income-eligible households.
- Intro 894-A eliminates employment status and source of income as voucher eligibility requirements.
- Intro 229-A prohibits DSS from deducting a utility allowance from the maximum amount of a rental voucher.
- Intro 704-A requires HRA to provide landlords the option to accept rental assistance payments via an electronic transfer into a bank account.

In October 2023, the City Council passed Intro 0703-A, which requires DSS to report quarterly on the timeliness of voucher payments and the reasons for past due payments. That same month, HPD and HDC announced that New York City households and housing vouchers would no longer undergo credit checks when selected for affordable housing, accelerating the process of entering new homes for over 4,000 families yearly, according to the MMR.²⁸ The credit checks took effect immediately through an update to HPD marketing guidelines. Lastly, as aforementioned, the city must comply with Local Law 118 of 2020, which requires online access to rental assistance program application status.

Although some have argued that expanding housing voucher assistance will cost New Yorkers too much over time, savings from reduced shelter stays offset program expansion costs. As aforementioned, a report released by Mayor Adams reveals that it costs the city over \$8,700 per month in 2022 to house a family of two in shelter. Alternatively, a CityFHEPS voucher to house this family would cost a maximum of \$2,387 or less per month. However, a study performed by the New York City Independent Budget Office (IBO) found that while the city increases voucher issuance each year, shelter exits are outpacing community placements. Therefore, existing laws, coupled with the necessary reform, need adequate enforcement to maximize the benefits derived from housing vouchers. In addition, the success of new voucher policies and anti-discrimination provisions

*Only 0.3% of families who exit the city's homeless shelters without a rental subsidy re-enter shelter within a year, compared to the 15.2% of families without subsidies.*³¹

will be maximized if the proposals receive support from all impacted entities, including brokers, owners, and rental housing developers.

Conclusion

Housing vouchers are essential to mitigate homelessness, increase housing stability, and support long-term human and economic health. New York City's tenant-based housing voucher programs are crucial in achieving equitable access to housing. Nonetheless, operational and administrative challenges within these programs impede their effectiveness and present voucher holders with significant barriers in securing suitable housing options.

Research underscores the pivotal role of voucher programs in improving health outcomes, enhancing neighborhood opportunities, and advancing equity. Yet, the persisting challenges highlighted by stakeholders, particularly regarding cumbersome processes, prolonged wait times, and inefficiencies in housing intake, underscore the pressing need for comprehensive reform.

Addressing these deficiencies demands both short-term interventions and long-term structural change. Until these challenges are effectively addressed, the full potential of voucher programs will remain unrealized, exacerbating the housing and homelessness crises afflicting New York City. Collaboration among stakeholders is essential in identifying and implementing tangible solutions. We urge city and state government to consider these proposed solutions as mechanisms to remedy existing disparities in the city's housing voucher programs and pave the way for a more equitable housing landscape.

Appendix

1. **Family Homelessness and Eviction Prevention Supplement (FHEPS):** administered by HRA and DHA, FHEPS provides up to five years of rental support for families who were evicted, are facing eviction, or lost housing due to domestic violence. FHEPS ensures that property owners are compensated fairly. Families must be receiving Cash Assistance (CA) to be eligible.
 - a. What You Need to Know About FHEPS: <https://legalaidnyc.org/get-help/housing-problems/what-you-need-to-know-about-hras-family-homelessness-eviction-prevention-supplement/>
 - b. FHEPS Fact Sheet for Property owners: https://www.nyc.gov/assets/hra/downloads/pdf/fheps_fact_sheet_for_property_owners.pdf
 - c. FHEPS Client Fact Sheet: <https://www.nyc.gov/assets/hra/downloads/pdf/FHEPS/HRA-146r-english.pdf>
 - d. FHEPS Payment Standards: <https://www.nyc.gov/assets/hra/downloads/pdf/FHEPS/HRA-146z-E.pdf>
 - e. Unit Hold Incentive Voucher: <https://www.nyc.gov/assets/hra/downloads/pdf/hra-145-e.pdf>
2. **CityFHEPS:** run by DHS, CityFHEPS is a voucher program for families with children who receive Cash Assistance and are at risk of being evicted or have lost their housing due to domestic violence or safety/health issues.
 - a. CityFHEPS Fact Sheet: <https://www.nyc.gov/assets/hra/downloads/pdf/CITYFHEPS/CITYFHEPS-fact-sheet.pdf>
 - b. CityFHEPS Frequently Asked Questions for Property Owners and Brokers: <https://www.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/dss-8j-e.pdf>
 - c. How to Register an Apartment/Room/SRO through CityFHEPS: https://www.nyc.gov/site/hra/help/property_owners.page
 - d. CityFHEPS Documents: <https://www.nyc.gov/site/hra/help/cityfheps-documents.page>
3. **Section 8 – Housing Choice Voucher Program:** a federal program administered through state and local governments that provides rental assistance to low-income families to rent privately owned housing. Local housing authorities, including NYCHA, HPD, and DHCR, run Section 8.
 - a. Section 8 Voucher Types: <https://www.nyc.gov/site/hpd/services-and-information/section-8-voucher-types.page>
 - b. Section 8 Property Owner Guide: https://www.nyc.gov/site/nycha/section-8/guide-for-property_owners.page
 - c. Voucher Payment Standards and Utility Standards: <https://www.nyc.gov/site/nycha/section-8/voucher-payment-standards-vps-utility-allowance-schedule.page>
 - d. Section 8 Tenants Frequently Asked Questions: <https://www.nyc.gov/site/nycha/section-8/tenants-faq.page>
 - e. Rent Reasonableness Frequently Asked Questions: <https://www.nyc.gov/site/nycha/section-8/rent-reasonableness-faq.page>
4. **Emergency Housing Voucher (EHV) Program:** run by NYCHA and HPD, EHV supports people who are in danger of experiencing homelessness, including survivors of intimate partner/domestic violence.
 - a. EHV Program Overview: <https://www.nyc.gov/site/nycccoc/ehv/ehv.page>
 - b. EHV FAQ: <https://www.nyc.gov/assets/nycccoc/downloads/pdf/ehv-faqs.pdf>
 - c. HUD's EHV Resources: <https://www.hud.gov/ehv>
 - d. Owner Resources: <https://www.nyc.gov/site/nycccoc/ehv/owner-resources.page>
5. **HIV/AIDS Services Administration (HASA):** administered by HRA, HASA offers intensive case management and housing assistance to individuals living with AIDS or HIV illness in New York City. HASA provides case management, home visits, long-term rental assistance, and short-term shelter, transitional, and supportive housing placement. Rental assistance covers any portion of the rent above 30% of monthly income for single cases.
 - a. HASA FAQs: <https://www.nyc.gov/site/hra/help/hasa-faqs.page>
 - b. HASA Housing Options: https://www.health.ny.gov/professionals/patients/discharge_planning/docs/2008-07-10_hasa_housing_options_jruscillo.pdf

Appendix Cont.

6. **HUD-VASH Vouchers:** HUD-VASH is a collaborative program that pairs Section 8 Housing Choice Voucher (HCV) rental assistance with Department of Veterans Affairs (VA) case management and supportive services for homeless Veterans.

a. NY State HUD-VASH Page: <https://veterans.ny.gov/supportive-housing-hud-vash-program>

b. HUD-VASH General Information: <https://www.va.gov/homeless/hud-vash.asp>

c. HUD-VASH Fact Sheet for Property Owners and Brokers:

https://www.nyc.gov/assets/hra/downloads/pdf/HUD-VASH-property_owner-fact-sheet.pdf

Notes

1. Mann, Chris. "Testimony by Win for the New York State Budget Hearing on Housing." Women In Need, Inc., February 2024. <https://nyassembly.gov/write/upload/publichearing/001411/005558.pdf>
2. Office of the Mayor. "Mayor Adams Gives New Yorkers Ability To Use City-Funded Rental Assistance Vouchers Across New York State." City Hall Press Office, September 2023. <https://www.nyc.gov/office-of-the-mayor/news/701-23/mayor-adams-gives-new-yorkers-ability-use-city-funded-rental-assistance-vouchers-across-new-york#:~:text=Since%20the%20implementation%20of%20city,provision%20of%20a%20rental%20subsidy>
3. Daniel Gubits, Marybeth Shinn et al., "Family Options Study: 3-Year Impacts of Housing and Services Interventions for Homeless Families," U.S. Department of Housing and Urban Development Office of Policy Development and Research, October 2016. <https://www.huduser.gov/portal/sites/default/files/pdf/Family-Options-Study-Full-Report.pdf>
4. Finnie, Ramona K C et al. "Tenant-Based Housing Voucher Programs: A Community Guide Systematic Review." Journal of public health management and practice: JPHMP vol. 28,6 (2022): E795-E803. doi:10.1097/PHH.0000000000001588
5. Newman, Sandra et al. "Experimental Evidence Shows That Housing Vouchers Provided Measurable Benefits, Including Parent Stress Reduction." Health affairs (Project Hope) vol. 43,2 (2024): 278-286. doi:10.1377/hlthaff.2023.01020
6. Brand, David. "NYC will accept Section 8 applications for the first time in 25 years. Here's what to know." Gothamist, January 2024.
7. Campion, Sean. "4 Fast FHEPS Facts." Citizens Budget Commission, May 2023. https://cbcny.org/sites/default/files/media/files/CBCBLOG_FHEPS-Facts_05082023_0.pdf
8. Steinberg, Daniel, Varlack, Camille. "Mayor's Management Report: Preliminary Fiscal 2024." Mayor's Office of Operations, January 2024. <https://gothamist.com/news/nyc-will-accept-section-8-applications-for-first-time-in-15-years-heres-what-to-know>
https://www.nyc.gov/assets/operations/downloads/pdf/pmmr2024/2024_pmmr.pdf
9. "Housing Choice Voucher Program Briefing." New York City Housing Authority, April 2021. <https://www.nyc.gov/assets/nycha/downloads/pdf/sec8briefing-English.pdf>; "CityFHEPS Frequently Asked Questions For Clients in the Community." NYC Department of Social Services, January 2024. <https://www.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/dss-7r-e.pdf>
10. Riddle, Safiyah. "City Struggling to Connect Housing Benefits App to New Yorkers Who Need It Most." The City, February 2023. <https://www.thecity.nyc/2023/02/27/cityfheps-current-housing- eviction/>
11. NYC City Council, Local Law No. 118 of 2020, Council Int. No. 2080-A of 2020 (17 November 2020).
12. "Property Management: Private Housing Finance Law Section 610." NYC Housing Preservation and Development. <https://www.nyc.gov/site/hpd/services-and-information/phfl-section-610.page>
13. Riddle, Safiyah. "Harlem Tenants Face Eviction After City Fails to Pay Vouchers." The City, February 2023. <https://www.thecity.nyc/2023/02/10/cityfheps-harlem-tenants- eviction- notices/#:~:text=A%20landlord%20filed%2054%20Housing,by%20Safiyah%20Riddle%20Feb.>
14. "Source of Income Discrimination." NYC Commission on Human Rights. <https://www.nyc.gov/site/cchr/media/source-of-income.page>
15. NYC City Council, Local Law 010 of 2008, Council Int. No. 61-A (26 March 2008).
16. NYS Division of Human Rights, New York State Human Rights Law (17 November 2023).
17. "City Commits \$3.1 Million to Combat Source-of-Income Discrimination and Reports Progress Made on "Where We Live NYC" Fair Housing Plan." NYC Housing Preservation and Development, March 2023. <https://www.nyc.gov/site/hpd/news/003-23/city-commits-3-1-million-combat-source-of-income-discrimination-reports-progress-made-on#/0>
18. "Source of Income Discrimination." NYC Commission on Human Rights. <https://www.nyc.gov/site/cchr/media/source-of-income.page>
19. Lee, Richard, Rosenberg, Jonathan. "New York City Council's Response to the Fiscal 2025 Preliminary Budget and Fiscal 2024 Preliminary Mayor's Management Report." New York City Council Finance Division, April 2024. <https://council.nyc.gov/wp-content/uploads/2024/04/FY25-Prelim-Budget-Response.pdf>

Notes Cont.

20. Steinberg, Daniel, Varlack, Camille. "Mayor's Management Report: Preliminary Fiscal 2024."
21. Steinberg, Daniel, Varlack, Camille. "Mayor's Management Report: Preliminary Fiscal 2024."
22. Katz, Jessica. "Housing Our Neighbors: A Blueprint for Housing and Homelessness." The City of New York, April 2022. <https://www.nyc.gov/assets/home/downloads/pdf/office-of-the-mayor/2022/Housing-Blueprint.pdf>
23. Katz, Jessica. "Brutal Bureaucracy Follow-Up." Citizens Housing & Planning Council, October 2023. https://chpcny.org/wp-content/uploads/2023/10/20231002_BB-Additional-Housing-Connect-Analysis.pdf
24. Hayes-Chaffe, Maura. "Review of the New York City Department of Homeless Services' Programs and Services." New York City Comptroller Brad Lander, August 2023. <https://comptroller.nyc.gov/wp-content/uploads/documents/MD22-105S.pdf>
25. Cabrera, Danny, Katz, Jessica. "Brutal Bureaucracy: NYC Housing Connect Analysis." Citizens Housing & Planning Council, November 2021. <https://chpcny.org/wp-content/uploads/2023/05/CHPC-NYC-Housing-Connect.pdf>
26. Cabrera, Danny, Katz, Jessica. "Brutal Bureaucracy: NYC Housing Connect Analysis."
27. Katz, Jessica. "Housing Our Neighbors: A Blueprint for Housing and Homelessness."
28. Steinberg, Daniel, Varlack, Camille. "Mayor's Management Report: Preliminary Fiscal 2024."
29. Katz, Jessica. "Housing Our Neighbors: A Blueprint for Housing and Homelessness."
30. Chafee, Louisa. "Understanding the City Fighting Homelessness & Eviction Prevention Supplement (CityFHEPS) Program: Budget, Usage, Expansion Projections, and Concerns." New York City Independent Budget Office, January 2024. https://www.ibo.nyc.ny.us/iboreports/CityFHEPS_Jan2024.pdf
31. Darin, Catherine. "Maximizing the Benefits of Housing Vouchers in New York City: Grantmaking and Advocacy Strategies for Robin Hood Foundation." Harvard Joint Center for Housing Studies, April 2023. https://www.jchs.harvard.edu/sites/default/files/research/files/harvard_jchs_housing_vouchers_grantmaking_darin_2023.pdf



Council before the NYC Council Committees on Gender Equity and General Welfare
Oversight: Domestic Violence Shelters
October 9, 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 Chairs Louis and Ayala and members of the Committees 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 the needs of domestic violence survivors in our shelters.

Background:

VOA-GNY operates 6 emergency and one Tier II domestic violence shelters. We also serve a large proportion of survivors on our general homeless family and women's shelters and are launching a rapid rehousing program for survivors later this fall.

Our confidential domestic violence shelters offer comprehensive case management services and on-site groups that help survivors gain the long-term skills that enable them to meet everyday challenges after leaving the shelter. Workshops are crafted with a trauma responsive lens and include topics designed to promote long term stability post-shelter including Budgeting and Money Management and Workforce Readiness. In addition, our shelters offer interactive educational activities and recreation for children, counseling, therapy and other mental health services, including art therapy. We also implement a first in the nation brain trauma screening program that was created in response to the hidden injuries many survivors sustain and often go undetected.

Addressing Brain Trauma:

In 2022, in partnership with Dr. Edie Zusman and Safe Living Space, Volunteers of America-Greater New York (VOA-GNY) began a groundbreaking initiative, implementing routine brain injury screening for all survivors of domestic or intimate partner violence at our seven domestic violence shelters.

Annually, an estimated 10 million adults in the United States experience domestic or intimate partner violence. Existing studies show that 83% of these individuals experience strangulation¹ and 74% sustain injuries to the head or neck.

Brain injury caused by external force, such as a blow to the head or neck, or strangulation, has both short- and long-term consequences including memory loss, disorientation/confusion, impaired judgment, loss of consciousness, depression, and emotional dysregulation or volatility. Multiple concussions over a lifetime increase an individual's risk of dementia, Alzheimer's, Parkinson's Disease and Chronic Traumatic Encephalopathy.

Despite the clear risks, domestic violence survivors are rarely assessed for brain injury in their interactions with law enforcement, medical or mental health systems, or victims' services. Instead, a disproportionate share of resources and discourse about traumatic brain injury (TBI) is centered around professional athletes.

By exposing the connection between domestic violence and traumatic brain injury, we begin to understand that the adverse outcomes survivors experience across these systems may have an unaddressed cause, beyond trauma and behavioral health issues. When TBI is appropriately diagnosed, we are able to modify programming and support survivors' recovery using the right tools to help them overcome their brain trauma symptoms that may have otherwise inhibited their progress. As a result of this work, domestic violence survivors will get better care, including medical treatment to mitigate the long-term impacts of brain injury, and be able to more successfully navigate housing search, court, child welfare and other systems.

Using a trauma-informed approach and protocols developed in consultation with Safe Living Space, staff assess all heads of household arriving at VOA-GNY domestic violence shelters for history and symptoms of brain injury. Those with positive signs are connected to brain injury specialists at partnering hospitals who are able to provide diagnostic services and treatment.

So far, 400+ heads of household have been screened and 57% report having had at least one injury to the head or neck within the last year. Majority Leader Farias introduced [Intro 29](#) in December 2023 which would require New York City to provide training to first responders and service providers about the connection between domestic violence and traumatic brain injury. Trainings would include education on the prevalence of TBI among domestic violence survivors, how to identify symptoms of TBI, how to respond to the needs of individuals with TBI, and the long-term health impacts of repeated brain injuries. It would also require the New York City Department of Health and Mental Hygiene and the Mayor's Office to End Domestic and Gender-Based Violence to conduct a public awareness campaign on the connection between DV and TBI.

This bill serves as an important legislative first step in the vital effort to bring awareness to the connection between domestic violence and traumatic brain injury, improve services for survivors, and equip them with the information they need to seek care and get back on their feet. Detecting these injuries earlier in a survivor's journey will allow us to better tailor services to meet their needs and help them confront the impacts of the brain trauma to support their healing.

With that in mind, Majority Leader Farias is also championing budget initiatives to improve access to care once a TBI is identified—including trauma-responsive concussion clinics for survivors which we wholeheartedly support. Through our work identifying brain trauma in survivors we have encountered resource gaps in terms of both trauma responsive medical care and, limitations with our own funding to provide accommodations to persons living with brain trauma. We would welcome financial resources to continue our brain injury screening protocol, dedicated staffing for training and replication in our other shelter settings as well as flexible dollars to deploy to support things like client transportation, assistive devices or other supports.

Strengthening Services for Survivors in HRA Contracted, Specialized DV Shelters:

When listening to survivors of domestic violence in our specialized shelter programs about their unmet needs we often hear they want to be safe, heard and believed. When I asked my team what the Council should know about our survivors' experiences in shelter and what services they hope for, this is what they shared:

Survivors prioritize stability - housing and shelter without arbitrary time limits is critical to their sense of safety and wellbeing.

- Rapid rehousing programs are attractive to survivors because they eliminate the uncertainty that comes from leaving an unsafe environment and going into shelter to wait for permanent housing which cannot be guaranteed. Many survivors report that once their housing needs are met, they can allow the healing to begin.
- Survivors typically express more of an openness to enrolling into therapy and other services that will help them to move forward in creating their new life only after housing has been secured. Still, most survivors are willing to enroll their children into therapy and other services while in our shelters even if they are not ready to seek such care for themselves. They are not comfortable with feeling increased vulnerability when they feel they need to remain “strong” due to the feeling of uncertainty that comes with living in a shelter with a time limit.
 - Given the emphasis survivors place on securing permanent housing as their primary goal, having more housing options for all types of needs and income levels is a priority for the people we serve.
 - Additionally, OCF's policy of limiting shelter status to a maximum of 180 days is experienced as destabilizing. At minimum, the length of stay should be extended for those with “specialized circumstances” such as those with immigration issues, complex mental health and medical issues, as well as those who can demonstrate that they will be able to secure housing with additional time. Ideally, there would be no arbitrary time limits at all. Assembly Member Cruz and Senator Hoylman-Sigal have introduced legislation (S8493/A9129) that would eliminate such time limits and VOA-GNY strongly supports its passage. Council Member Brewer has sponsored [Resolution 363](#) supporting this bill and we urge the Council to pass it in solidarity with survivors and others in time limited shelter systems who are suffering from the stress of these time limits.

Shelter programs need additional resources to meet the changing needs of those entering shelter.

- The number of single adults seeking shelter services has increased in recent years. Even though our shelter system was designed with the needs of families in mind – meaning apartments were configured to be occupied by parents entering shelter with their children – to accommodate the needs of the many single adults seeking shelter one of two things has to happen.
 - 1) We wind up splitting apartments that would have housed a single family and instead, sheltering two unrelated single adults OR
 - 2) We house a single survivor in a room intended for two persons, forgoing 50% of the per diem that we could have billed for that space given the reimbursement model is based on a “heads in beds” formula

In the first instance, the workloads of the case managers will essentially double because instead of supporting one head of household with counseling, benefits access and housing search, now you are doing that work for two households with no additional resources to hire more staff. In the second instance while the workload is not increased (because the second bed isn’t being filled) the funding is halved causing the program to operate at a deficit and risking the fiscal viability of the program. In both cases, it is simply not sustainable to serve the many single adults including older survivors, LGBTQ+ survivors and males all of whom tend to be underserved and present for services most often without children, unless the funding rubric is changed.

Fortunately, the NYS Legislature passed the SAFE Shelter Act last session which would change the per diem rate for single adults occupying a double occupancy room to better reflect the costs of serving them by allowing the program to draw down funding as if a parent and child were occupying the space. Unfortunately, the Governor has not yet signed the SAFE Act placing our ability to serve single survivors without risking the fiscal viability of our programs in jeopardy. We would appreciate the Council’s support in advocating for the governor to sign the SAFE Act into law so that access to shelter can be made more equitable to everyone, regardless of their family composition.

- Increased funding is also needed for Creative Arts Therapy, onsite at DV Shelters. It’s not always easy to verbally communicate feelings and especially to a stranger who is your therapist. There is that struggle to put into words how a survivor is feeling for both children and adult survivors of trauma. We also must consider that meeting with a therapist can be intimidating. Therefore, our Art Therapy Programs have been critical in helping our teams connect with survivors to support them working through their trauma. VOA-GNY so strongly believes in this model that we deploy our per diem funding for this purpose while many other DV shelter providers choose to use it to fund MSWs to do traditional clinical social work. Because we host Health and Hospital’s staff that was embedded at many DV programs under the THRIVE Initiative to meet the need for traditional social workers we haven’t had to make the choice to do one or the other but, not every provider has this option. In a perfect world, the rates would be sufficient to support both modalities.

Meeting the Need for Survivor Centered Services in DHS Shelters:

In VOA-GNY’s DHS Tier II Family Shelters and our Employment Shelter for single adult women we are not resourced to provide specialized services to DV survivors. In an effort to better serve those who are impacted by domestic violence in these “general” shelters, VOA-GNY deploys our clinical team to sites as

needed to assess their needs and connected to care. The leader of that clinical team shared the following information regarding the experience of working with DV survivors in those settings:

Survivors in DHS shelters often do not have anyone to advocate on their behalf. They struggle to access specialized DV services and are often placed in general population shelters without specialized DV services.

- They face difficulties finding DV shelters that accommodate larger families, complicating staying together while seeking safety.
- Not all staff at the general shelter programs understand the needs of DV survivors to ensure their safety and access to essential services during this vulnerable time.
- Survivors may have relocated to NYC to escape their former spouse or domestic partner. They may or may not qualify for NoVA (No Violence Again, the DV unit that screens for eligibility for DV services at DHS intake centers and triages them to specialized DV shelters when space permits), but even if they qualify for NoVA, they may be reluctant to leave their DHS shelter assignment because they have adjusted to it.
- They are offered different housing programs because they are DV survivors (FHEPS versus City FHEPS). Many do not qualify for these programs because they are undocumented or asylum seekers, and most do not have income.
- They may not have emotional or financial support from family or friends, especially when they have left the state to start over in New York City.
- Legal assistance with things like renewing expired orders of protection (OOP) or how and where to look up the status of OOP is an unmet need.
- The mechanism to secure a safety transfer for survivors who have emergencies while in a DHS shelter placement is not transparent or easy to navigate. DHS needs to have a system in place to expedite safety transfers for DV Survivors.

The Need for Enhanced Community Based Resources:

Whether residing in a specialized DV shelter program hoping to transition to independent housing while maintaining some level of support or, residing in a DHS shelter without trauma responsive care for survivors in place, it is clear that non-emergency community based DV resources would be useful. The challenge is that the existing network of community based DV services are overly taxed and tend to focus on immediate needs and safety plan and tend to be less able to enroll those who may not need the full complement of services but rather supplemental supports in order to thrive. We therefore recommend the following:

- Increased funding for activities that encourage empowerment for survivors in the community is necessary. While many of our DV shelter sites have weekly support groups for survivors in, order to foster a successful transition to permanent housing, it is helpful to build community outside of the shelter environment so that support can continue when they leave our care. We do partner with non-residential DV providers but, because their focus tends to be on survivors in emergency situations in the community, there is a gap in care for those who are relatively stable

but who need to build community to continue their healing journey. Enhanced access to nonresidential supports would be a welcome addition to the continuum of services.

- Many of our survivors are immigrants with specialized concerns related to their status as DV survivors. They may be eligible for VAWA protections, U-Visas or T-Visas and require legal assistance that is different from those that the many other immigrants in NYC seeking asylum may be pursuing. Expanded access to specialized DV informed legal immigration services would be hugely helpful. Most legal services for immigration assistance have a long wait-lists that deter survivors from wanting to leave their abuser for fear of deportation as frequently abusers tend to menace survivors with they will call immigration if they leave the relationship. Having those in imminent danger in the same queue for services as those who are physically safe in the US who have up to a year to file for assistance is a challenge. In no way do I want to imply that asylum seekers do not also need significantly more support to meet those filing deadlines (we operate shelters for asylees who are also struggling to connect to adequate representation) but, there is a subset of people, many of whom are in our general DHS shelters, who need legal assistance to better inform their decision on whether or not they leave an abusive partner who may have control over their immigration remedies absent expert legal intervention from a trusted DV services provider.

Legislation:

Regarding pre-considered introduction [T2024-2573](#) related to tracking the demand for domestic violence shelter by reporting on the applications for specialized shelter services disaggregated by household composition, we support the intent of this introduction but have some questions about how the data would be collected or if it is even feasible to do so. Unlike DHS shelters, there are many points of shelter entry into the HRA shelter system set up for survivors fleeing abuse. Survivors may call the City's main DV hotline operated by Safe Horizon, call a domestic violence service provider referral line directly (such as the one VOA-GNY operates), receive assistance from a culturally specific organization with linguistic capacity to serve certain immigrant populations, apply through the Department of Homeless Services No Violence Again (NoVA) unit or, receive a referral from a NYC Family Justice Center. Given the multiple avenues for accessing shelter, there is a practical difficulty in accurate reporting. Should the Council request that each DV service provider track referrals and calls from each of these sources, that would require additional resources and distract from our core mission of providing access to care regardless of the referral source.

Although there is no centralized place where the data can easily be collected, information about survivors' needs is critically important. We as a City need to better understand who is in need of shelter services and whether or not the current capacity matches the needs of those seeking services. VOA-GNY is engaging a team of graduate student researchers to get at the question using existing data sources and, we would welcome additional support and capacity to better track the need and align our shelter portfolio accordingly. Perhaps the Council could consider requiring HRA to commission a study analyzing trends in DV shelter demands including demographic information of those seeking services and to publish it annually. In this way, the onus for aligning care to need is laid appropriately at the City level and, representative sampling from various referral sources can be used which would be a lower administrative burden that would furnish similar results.

Pre-considered introduction [T2024-2573](#) would require the tracking of outcomes of domestic violence shelter stays. This issue is near to my heart. For nearly 10 years when I was working at New Destiny Housing Corporation, I led the “Statistics for Advocacy” program where, in collaboration with members of the New York City Coalition of Domestic Violence Residential Service Providers, including VOA-GNY where I am now employed, I surveyed each DV shelter in NYC monthly and manually tracked all discharge reasons and destinations from emergency and Tier II DV shelters in the system as well as evaluated housing eligibility and status on exit. This unfunded project provided critically important information about housing access for survivors which led to reforms that ultimately extended NYC funded housing vouchers to DV shelter residents, changed the criteria to secure NYCHA DV priority and created access to supportive housing for survivors in the ESSHI supportive housing agreement. Collecting the information necessary to make the case for these housing resources should never have been left to a volunteer coalition of providers to collect and analyze on their own but without it, we would never have been able to advance so many important policy initiatives. I am personally very grateful to the Council for introducing this bill and placing the onus for this data collection where it belongs, on the City, so we can understand the housing needs of survivors in shelters citywide and respond accordingly.

Closing:

We are grateful for the opportunity to testify and look forward to working with the Council and Administration to continue to improve the experience of survivors in our care. Should you have any questions, I can be reached at ctrapani@voa-gny.org.

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



Advocates for Children of New York

Protecting every child's right to learn

**Testimony to be delivered to the New York City Council
Committee on General Welfare and Committee on Women and Gender Equity**

Re: Supporting Domestic Violence Survivors in NYC's Shelter System

October 9, 2024

Thank you for the opportunity to speak with you about supporting families living in New York City's shelter system who are survivors of domestic violence. My name is Janyll Canals, and I am the Director of the Robin Hood Project at Advocates for Children of New York (AFC). For over 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 experiencing homelessness.

To fully support survivors of domestic violence in the shelter system, families need their children to be able to attend school and feel safe in their school communities. However, through our work with Sanctuary for Families and Safe Horizon, two of the City's largest service agencies for survivors of domestic violence, we have seen survivors in the shelter system face many barriers to accessing educational services for their children based on their housing status, need for confidentiality or need for more school-based supports.

Students in shelter in grades K-6 are entitled to busing so that they do not have to transfer schools when placed in a shelter. However, unlike students in Department of Homeless Services (DHS) family shelters, students in domestic violence shelters are not *automatically* provided with busing, and there is often confusion about the responsibilities of school staff members and domestic violence shelter providers in arranging transportation and entering the confidential PO Box addresses needed for bus routes. This confusion often leads to delays, school absences and ultimately unnecessary school transfers due to lack of timely transportation. Such confusion can also compromise a family's safety and confidentiality. Just last week, a school requested the confidential location of a shelter from both the parent and shelter provider even though the confidential address is not needed to provide busing. To

Board of Directors

Kimberley D. Harris, *President*

Harriet Chan King, *Secretary*

Paul D. Becker, *Treasurer*

Eric F. Grossman, *President Emeritus*

Carmita Alonso

Matt Berke

Whitney Chatterjee

Matt Darnall

Jessica A. Davis

Brian Friedman

Caroline J. Heller

Jamie A. Levitt, *past president*

Maura K. Monaghan

Jon H. Oram

Jonathan D. Polkes

Victoria Reese

Ashish Shah

Veronica M. Wissel

Executive Director

Kim Sweet

Deputy Director

Matthew Lenaghan



**Advocates for Children
of New York**

Protecting every child's right to learn

better support survivors and their families, the City should encourage NYCPS to implement the recommendations of the Students in Temporary Housing Transportation Taskforce, including creating a protocol that clearly defines the roles and responsibilities of NYCPS staff and shelter staff.

We have also had cases in which New York City Public Schools (NYCPS) staff has failed to update students' profiles to limit communication and contact with a potentially dangerous person despite families providing documentation of domestic violence and requesting notice prior to any disclosure of information, putting the safety of families in jeopardy. As a result, families may be required to immediately transfer their children to another school in another borough to maintain their safety, disrupting school attendance and stability. In fact, while schools can create safety plans with families upon being notified of domestic violence, we often find that schools do not even know what a safety plan is or how it can protect survivors and their families.

We encourage the City to recognize that supporting survivors of domestic violence in the shelter system also means ensuring that NYCPS is prepared to support these families and has the systems in place to ensure their children can attend school.

Thank you for the opportunity to speak with you. I would be happy to answer any questions you may have.



New York City Anti-Violence Project

116 Nassau Street, 3rd Floor
New York, New York 10038
212.714.1184 *voice* | 212.714.2627 *fax*
212.714.1141 *24-hour hotline*

10/09/2024

Good afternoon, my name is Laura Horvath-Roa, I use she/her pronouns, and I'm a Staff Attorney with the New York City Anti-Violence Project. Thank you to the Committee on General Welfare and the Committee on Women and Gender Equity for holding this oversight hearing.

AVP is the only LGBTQ-specific victim services agency in New York City, and the largest organization in the country dedicated exclusively to working with LGBTQ and HIV-affected survivors of all forms of violence, with a special focus on intimate partner violence (IPV), sexual violence (SV), hate violence (HV), hookup/pick-up/dating violence, stalking, and institutional violence. AVP contracts with HRA as the City-Wide provider of non-residential domestic violence services to LGBTQ communities, and we are the only LGBTQ-specific rape crisis center in New York State. We operate a 24/7 hotline that is bilingual in English and Spanish and provide legal and counseling services to our community. All of our services are free and confidential.

AVP is the coordinator of the New York State LGBTQ Intimate Partner Violence Network, and along with colleagues from all over the state, we have produced a toolkit called Increasing Shelter Access to LGBTQ Survivors of Intimate Partner Violence. Today I'll share some of the key recommendations from the publication, and you'll also find copies of the short guide with the copies of my written testimony.

Many domestic violence programs and shelters in New York often focus solely on a heteronormative paradigm of domestic violence, and deny LGBTQ survivors full access to services, including safe shelter. AVP played a key role in the 2013 reauthorization of the Violence Against Women Act, and as a result VAWA is the only federal act that protects LGBTQ people from discrimination in accessing services. For more than a decade now, DV shelters have been federally mandated to provide services to LGBTQ people. That means a trans woman, or a gay man, or a nonbinary person must be accommodated and cannot be turned away - our safety and survival matters. However, in practice people do get turned away by staff at shelters in NYC – and sometimes LGBTQ people experience hate violence from others in the shelter system and staff do not stop it. This means that survivors have been forced to choose between homelessness and going back to their abusive partner. Transgender survivors of IPV often face even more pervasive and unique barriers and discrimination in trying to access safety and support. For a survivor to ask for help is not easy, and when LGBTQ people are turned away or mistreated at the very institution they turned to for support, it is re-traumatizing and further isolating.

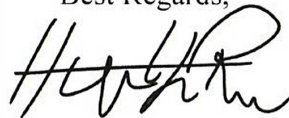
The Shelter Access tool we have developed guides shelter staff through the basics of an agency assessment, which includes key questions for evaluating the intake process, communicating inclusiveness to all clients, and screening that includes a primary aggressor assessment. Inclusiveness is communicated at the level of staff language and signage throughout the space.

However, it also includes access to gender neutral spaces, especially bathrooms, which may also require education and accountability for all people using the space, not just LGBTQ survivors.

Many, if not most, of our clients have at least a tangential connection to the system in one form or another. We frequently work with clients living partially or fully in shelters. Many of our clients are LGBTQ+ immigrants who face increased risk of IPV and related harms due to a nexus of connected factors (sexuality and gender identity, immigrant status, racial and ethnic identity, language, etc.). Consider the case of Tiffany, a transgender woman who contacted our offices trying to escape her abusive partner. Tiffany is a transgender woman with no children. We encouraged her to call the DV hotline and seek a DV shelter, which was essential because Tiffany was afraid that her abuser would hunt her down and kill her, as he had tried to do in the past. For months she would call the hotline and be told that there are no beds for single people, all the while still experiencing frequent violence. Eventually, she did get access to DV shelter, which had resources to help her. Unfortunately, one of the other survivors staying there noticed that Tiffany was a trans woman and told everyone, expressing fear for having been placed in the shelter with her. Even though Tiffany wanted to stay in this shelter, she was the one who was forced to be transferred, and this negatively impacted her ability to continue to get to work.

We ask today that the needs of LGBTQ survivors be interwoven in all shelters and expanded safeguards and training developed to ensure the safety and dignity of the LGBTQ population. AVP has developed the framework for putting shelter access into practice – we also offer a detailed, self-guided assessment tool that shelters can use to get a picture of how accessible they are for LGBTQ people. We also offer LGBTQ cultural competency trainings to staff and volunteers at shelters and other service providers.

Best Regards,



Laura Horvath-Roa
Staff Attorney

New York City Anti-Violence Project
116 Nassau Street, 3rd Fl
New York, NY 10038

SHELTER ACCESS

— TOOLKIT —

NEW YORK STATE
LGBTQ
INTIMATE PARTNER VIOLENCE
— NETWORK —

INCREASING SHELTER ACCESS
TO LGBTQ SURVIVORS
OF INTIMATE PARTNER VIOLENCE

INTRO

The New York State LGBTQ Intimate Partner Violence Network (the Network) seeks to raise awareness of and improve response to the intimate partner violence that impacts lesbian, gay, bisexual, transgender and queer (LGBTQ) communities throughout the state. The Network supports service providers, advocates, policymakers and others by providing education and advocacy, fostering collaboration, and identifying and working towards needed change. This toolkit is a guide to help you begin to make your shelter space LGBTQ inclusive and ensure that LGBTQ survivors have better access to services statewide.

The toolkit was created by the Network's Shelter Access Committee in an effort to address concerns that staff members at traditional domestic violence programs may have regarding sheltering survivors of intimate partner violence whose gender and/or sexual identity may be different from the majority of survivors most often served by the shelter (i.e. cisgender¹ women abused by cisgender men). Anti-discrimination mandates under state and federal law, and often present in organizational funding streams, require that domestic violence programs shelter all survivors, regardless of their sexual or gender identity. We suggest reading the **VAWA 2013 FAQ DOCUMENT**² and the **FVPSA LGBTQ ACCESSIBILITY POLICY**³ for more information.

1. **ACISGENDERPERSON** is someone who identifies as the gender/sex they were assigned at birth. For example, someone whose birth certificate says female, and who identifies as a woman.

2. United States Department of Justice. 2014. Nondiscrimination Grant Condition In The Violence Against Women Reauthorization Act of 2013. Retrieved from <http://www.justice.gov/sites/default/files/ovw/legacy/2014/06/20/faqs-ngc-vawa.pdf>

3. United States Government Publishing Office. 2013. Appendix B: LGBTQ Accessibility Policy. Retrieved from <http://www.gpo.gov/fdsys/pkg/FR-2013-04-18/pdf/2013-09093.pdf>

THE ISSUE

INTIMATE PARTNER VIOLENCE (IPV) affects many LGBTQ people, but there is a great deal of silence surrounding IPV, both within LGBTQ communities and from traditional domestic violence service providers. Resources are often prioritized in a way that do not provide the necessary supports to LGBTQ survivors, nor that support prevention efforts, including the cultural transformation necessary to end the stigma and silence around IPV within LGBTQ communities. Many domestic violence programs in New York State often focus solely on a heteronormative paradigm of domestic violence, i.e., on men's violence against women, and deny LGBTQ survivors full access to services, including safe shelter, because LGBTQ survivors do not meet their traditional understanding of who a survivor is. In addition, programming is often structured in a way that does not assist people outside of the heteronormative construct (i.e. cisgender women abused by cisgender men). As a result, LGBTQ survivors often must endure abuse far longer and with greater intensity, because no competent services are available. Some have been forced to choose between homelessness and going back to their abusive partner. Transgender survivors of IPV often face even more pervasive and unique barriers and discrimination in trying to access safety and support. This form of institutional oppression is re-traumatizing and further isolating. Raising awareness and education about these issues is one of the first steps to creating cultural change and policy shifts within your agency, to ensure that all survivors, across gender identity and sexual orientation, have access to safety, support, and services.



INCLUSIVE PRACTICE

Inclusion means actual, meaningful access to residential and non-residential core services and other programming that IPV programs are licensed, approved or otherwise funded to provide, including:

- Hotline Assistance
- Emergency and/or Transitional Housing
- Information & Referral
- Advocacy
- Counseling & Support Groups
- Community Education & Outreach
- Children's Services
- Legal Services
- Transportation
- Translation & Interpretation Services
- Other Specialized Services and Funded Programming

AGENCY ASSESSMENT

A key aspect of increasing LGBTQ survivors' ability to access to your services will be to conduct a thorough agency assessment. An agency assessment will provide information about current practices and highlight areas that need improvement. It is strongly recommended that such work be done in collaboration with an Intimate Partner Violence Network technical assistance provider. The New York State Intimate Partner Violence LGBTQ Network can provide this necessary technical assistance.

INCLUSIVE INTAKES

The intake process is one of the earliest points of contact a survivor has with your program. It's important that it be a welcoming and affirming experience for all survivors. By letting new people know that your space welcomes all survivors of domestic violence you both flag it as a safe space if the person identifies as LGBTQ, while also

letting non-LGBTQ identified survivors know that the space is open to any survivor of IPV and that your organization prioritizes safety and respect for everyone, regardless of sexual or gender identity. You can begin with a simple examination of your space. Does it include posters and references to LGBTQ relationships, safety, and inclusion?

In addition, collecting certain information on sexual orientation and gender identity at intake can help your organization provide more tailored, appropriate and supportive services to clients. Here are a few tips on how to make your intake forms and process more inclusive:

SAMPLE IDENTITY QUESTIONS:

- "How do you identify your gender?"
- "What pronouns do you prefer?"
- "What is your sexual orientation?"

AFFIRMING A SURVIVOR'S IDENTITY:

- You cannot and should not judge or assess someone's orientation or gender identity based on their appearance or mannerisms.
- Ask for the survivor's preferred name and gender pronouns, and ensure you and all staff use them. Do this regardless of what you may see on the person's identification as not all identification may accurately reflect their identity. If you do not know their preferred pronoun, then do not assign one to them. Use 'they' or 'that person' or their name in place of an assumed pronoun.
- If for legal reasons, you need to gather information about a survivor's legal name, you should avoid asking "what is your real name" and instead ask "what is your given name."

CREATING A WELCOMING SPACE

Creating gender neutral space is vital to ensuring your services are LGBTQ inclusive. Here are several tips:

- **USE THE TERM “SURVIVORS”** rather than “women” when referring to the people you serve. Use a variety of pronouns that reflect the unique genders of all survivors.
- **USE THE TERM “ABUSIVE PARTNER”** as opposed to man, or batterer. Use a variety of pronouns that reflect the unique genders of all survivors.
- **PROVIDE A VARIETY OF SUPPORT GROUP OPTIONS** for residents to choose from that will be inclusive to the different communities you serve. **BE FLEXIBLE** so that you can offer groups that meet the needs of the people currently in your program. Encourage an understanding of the common experience of survivors.
- **CREATE RESIDENTIAL ROOMS THAT CAN BE CONNECTED OR SEPARATED** via locked doors to create bigger or smaller private rooms as needed. This kind of design offers shelters the flexibility to offer privacy and safe housing to both individuals and families alike. If you do not have the ability to alter your space, **USE YOUR EXISTING SPACE CREATIVELY** so LGBTQ people are not excluded.
- **PROVIDE GENDER NEUTRAL OR PRIVATE BATHROOMS.**
- **CONSIDER WAYS YOU CAN COMMUNICATE WITH RESIDENTS** that your facility is inclusive, beginning at intake, when you describe your shelter practices and protocols.
- If residents say or do something homophobic or transphobic, **ADDRESS THE ISSUE** in the same way you would any other biased or discriminatory remarks or behaviors (e.g. just as you would with racist, sexist, or anti-immigrant slurs.)
- **PROVIDE IN-DEPTH STAFF TRAINING** and discussion about how to support the specific needs of LGBTQ residents, especially transgender and male identified residents.
- **IT IS ESSENTIAL THAT ALL LGBTQ PEOPLE BE UNDERSTOOD**, accepted, and addressed as the gender with which they identify, regardless of how you interpret their presentation. This is similar to any other protocol around respect and non-discriminatory behavior.

SCREENING

Domestic violence programs have a commitment to providing supportive advocacy to survivors of domestic violence. Traditional programs have often strongly relied on the gender of the prospective client to help them determine if the person is a survivor or abuser. While this determination is based on widely-accepted anecdotal and formal prevalence data⁴ from the **CENTERS FOR DISEASE CONTROL (CDC)**, it can be highly problematic because it completely excludes the lived experiences of LGBTQ survivors and leaves advocates without the proper training necessary to identify victims and perpetrators within these communities. Training in effective and inclusive screening practices is an essential part of service provision and gives advocates the opportunity to more accurately assess all potential clients patterns of abuse, rather than merely relying upon the gender as the sole indicator of victimization or perpetration.

A FEW KEY PRINCIPLES OF EFFECTIVE, INCLUSIVE SCREENING INCLUDE:

⁴ Centers for Disease Control. 2012. Understanding Intimate Partner Violence Fact Sheet. Retrieved from http://www.cdc.gov/violenceprevention/pdf/IPV_factsheet-a.pdf

PRIMARY AGGRESSOR ASSESSMENT

— Any IPV assessment should include an analysis of power and control dynamics in a relationship, so as to identify who holds the majority of power and control in the relationship, and who does not, without relying on gender stereotypes or assumptions based on appearance. Below are key areas to consider during assessment.

- **PHYSICAL VIOLENCE**
While more than one partner can use violence, assess what the purpose and the impact of the violence is. Is it in self-defense? Who has the more serious injuries? Who is arrested or held accountable for the violence?
- **EMOTIONAL VIOLENCE**
Whose world is getting smaller? Who is more isolated? Who feels more responsible/guilty?
- **ECONOMIC VIOLENCE**
Who has control of the finances? Even if one partner earns most of the income, do they control the finances? Are finances used as a means of power and control?
- **SEXUAL VIOLENCE**
Who controls decisions around when and how the couple has sex? Does one person feel coerced into having sex? Does one person feel they have to have sex with their partner in order to avoid further conflicts/abuse?

DON'T ASK WHY. ASK WHAT, WHO, HOW, WHERE AND WHEN.

EXAMPLES: What do you do when you get upset? What happened during the argument? What was the argument about? How are decisions made? Who are your friends, family and other supports? Where do you work/go to school? Where does your partner work/go to school?

- **CONTEXT** — Is the coercive or aggressive behavior about trying to survive or about trying to control?
- **EFFECT** — How did the behavior affect the person being interviewed?
- **INTENT** — Remember that it is not about figuring out who has done what to whom, but rather, it is about determining which person is exercising systematic power and control over the other.



TRAININGS & TECHNICAL ASSISTANCE AVAILABLE:

Remember, this toolkit is just a beginning. As you work to create an inclusive shelter space, it is important to provide extensive training for all levels of your staff. You can request a free training from the **NEW YORK STATE INTIMATE PARTNER VIOLENCE LGBTQ TRAINING AND TECHNICAL ASSISTANCE CENTER.**

TAKE ACTION!

If your organization is interested in taking on-going action please consider applying to join the **NEW YORK STATE LGBTQ INTIMATE PARTNER VIOLENCE NETWORK.**



**NEW YORK STATE
LGBTQ
INTIMATE PARTNER VIOLENCE
— NETWORK —**

This toolkit was created by the
**NEW YORK STATE LGBTQ
INTIMATE PARTNER VIOLENCE NETWORK'S
SHELTER ACCESS COMMITTEE**

and would not have been possible without the work of:

**CORBIN STRETT,
CHRISTINE RODRIGUEZ,
YASMIN SAFDIE,
CATHERINE HODES,
CATHERINE SHUGRUE DOS SANTOS,
AMY SCHWARTZ,
RACHEL GOLDSMITH,
AND SHELBY CHESTNUT.**



**THE NEW YORK STATE LGBTQ INTIMATE PARTNER VIOLENCE
NETWORK is coordinated by THE NEW YORK CITY ANTI-VIOLENCE
PROJECT.**



www.cfrny.org ♦ 212.691.0950 ♦ info@cfrny.org

Bronx: 190 East 162nd Street ♦ Bronx, NY 10451 ♦ Fax: 212.691.0951

Manhattan: 40 Worth Street, Suite 605 ♦ New York, NY 10013 ♦ Fax: 212.691.0951

Queens: 89-14 Parsons Boulevard, 2nd Floor ♦ Jamaica, NY 11432 ♦ Fax: 718.291.4360

Center for Family Representation (CFR)
Submitted Testimony for Committee on General Welfare and Committee on Women and Gender Equity

Hearing Date: October 9, 2024

Oversight: Supporting Domestic Violence Survivors in NYC Shelters

My name is Karena Lim-Peralta and I am a Social Work Supervisor with the Center for Family Representation, Inc. (CFR) in the Bronx Practice. I work directly with parents facing neglect and abuse prosecutions from the Administration for Children's Services (ACS) in Bronx Family Court.

CFR is grateful for the opportunity to submit testimony to the Committee on General Welfare and Committee on Women and Gender Equity. We thank Deputy Speaker Ayala and Chair Louis, and the Committees for providing the opportunity to focus on this important issue as October is Domestic Violence Awareness Month.

Overview of CFR

CFR is the county-wide assigned indigent defense provider for parents who are facing ACS prosecutions in Family Court Act Article 10 proceedings in Queens, New York, Bronx, and Richmond counties. Since our founding in 2002, we have represented more than 13,500 parents with more than 27,500 children. CFR represents parents on their original neglect or abuse case and on any related cases like custody, guardianship, visitation and termination of parental rights cases. Our goals are always to prevent a foster placement, or when one is unavoidable, to shorten the time that families are separated and help families stabilize when reunited, and to prevent re-entry into placement after reunification.

CFR employs an interdisciplinary model of representation, marrying in court litigation to out of court advocacy: every parent is assigned an attorney and a social work staff member and these teams are supported by paralegals, supervisors, and parent advocates, who are parents who have direct experience being prosecuted by the family policing system, losing their children to the foster system and safely reunifying their families. In 2015, the New York State Bar Association gave CFR its Award for Promoting Standards of Excellence in Mandated Representation, noting

that CFR “exemplifies and defines the highest professional practice standards, is a recognized innovator in parent representation and is a tireless advocate for legislative and policy reform.” The federal Administration for Children, Youth and Families specifically cited CFR in the addendum to its January 2017 Memorandum on High Quality Legal Representation, issued to all fifty states.

To better support family integrity, CFR launched our Home for Good program in 2015 to help families with collateral challenges that are the result of or contribute to family policing investigations and prosecutions. With the support of New York City Council, Home for Good serves clients in the areas of housing, immigration, public benefits, and concurrent criminal matters. DoVE funding from the City Council is also critical in helping us maintain our model and allows us to provide social work support to survivors of domestic violence. In 2019, CFR further expanded its work, creating a Community Advocacy Project to help families navigate family policing investigations and avoid family separation while at the same time ensuring the parents are not barred from employment by representing parents in efforts to amend and seal their records with the Statewide Central Register (SCR). CFR also launched its Youth Defense Practice and now represents young people in Manhattan, Queens, and Bronx criminal and family courts with its interdisciplinary model with the goal of avoiding incarceration.

Our Work with Survivors of Domestic Violence within the Family Policing System

Each year, about 24% of CFR’s clients identify as survivors of domestic violence and about 25% of our clients face neglect allegations specifically related to domestic violence. Our clients who have experienced domestic violence often experience staying in a shelter as another experience of coercion and surveillance that puts their families at risk of harm. When our clients and their children are forced to comply with arbitrary shelter policies, shelter staff who are mandated reporters often report them to the SCR, prompting a child protective investigation - what we call a family policing investigation - by ACS.

Family policing investigations are harmful themselves and can exacerbate feelings of fear and instability that many families who are fleeing domestic violence experience. ACS requires families to answer invasive questions, subject themselves to searches of their homes and bodies, and interrogate and search their children. The families that we work with have incredible resiliency and lean on their inner strength and courage, leaving dangerous situations in a state of crisis for safety and security - only to realize that these things are incredibly difficult to find within the City’s shelter system.

In 2023, 9,805 reports were called in by mandated reporters in social services settings. 5,710 of those reports were investigated and unfounded, meaning that the family policing system did not find evidence to support the claim that a child was abused or maltreated. Shelters designated for domestic violence survivors do not guarantee safety. The cycle of domestic violence is

perpetuated when survivors have no other option but to place their family's safety and future in the hands of those who hold power and control, and tell our clients what they "must" do in order to be able to remain with their children, especially if that means residing in the shelter system where their actions and family will be policed.

Survivors can also face retraumatization within shelters - there is a lack of physical and emotional space and support, compassion, understanding, cultural humility, and trauma-informed care. Survivors have shared that oftentimes, shelter staff do not have conversations with them to better understand their family's situation, and they are affected by judgment and gender stigmas. Ending mandated reporting and permitting shelter staff to first work with families to provide them with support and resources before initiating a family policing investigation would protect CFR's clients from further harm. Furthermore, there is no meaningful security that could prevent abusive ex-partners from inflicting additional harm - physically, emotionally, or through use of the family policing system. The family policing system does not make our clients and their families safer. Our clients have suffered from being separated from their families because a shelter staff, another resident, or their abusive ex-partner has called the SCR and made a report against them. Many people do not know what happens after a call and report is made to the SCR, but we at CFR continue to see the long-lasting and generational effects of the family policing system.

In reality, some systems that intend to help families can also cause them harm. The threat of family separation exists within the City's shelter system, and families who have experienced the trauma of domestic violence continue to experience trauma in the shelters as they live under the constant judgment and surveillance of mandated reporting. We ask that you consider eliminating mandated reporting and investing in community-based organizations that provide more direct and on-site support to survivors of domestic violence residing in the shelter system so they could better support survivors through crisis and trauma, address their concrete needs, and transition them to safety and stability without risking additional surveillance and policing. Thank you for the opportunity to provide our testimony and for the Committees' work to address effective support for survivors of domestic violence.

Courtney Bryan. Executive Director

**Center for Justice Innovation
New York City Council
Joint Committees on General Welfare &
Women and Gender Equity
October 9, 2024**

Good morning, Chairs Ayala and Louis and esteemed members of the Committees on General Welfare and Women and Gender Equity. My name is Heaven Berhane and I serve as the Project Director of the RISE (Reimagining Intimacy through Social Engagement) Project at the Center for Justice Innovation. Thank you for the opportunity to testify today on this urgent topic.

At the RISE Project, we work to transform responses to intimate partner violence, focusing specifically on its intersection with gun violence. Gun violence and intimate partner violence are often viewed as separate problems that require different responses, but neighborhoods impacted by high rates of gun violence also have the highest levels of reported domestic violence incidents. Access to a gun makes it five times more likely that a partner experiencing abuse will be killed.¹

Over the past few years, instances of domestic violence related homicides are increasing. There were 71 domestic violence homicide deaths in New York in 2022, up nearly 15 percent from the year before.² Black and Hispanic women were disproportionately affected, with Black women comprising 41 percent of the victims despite representing just 21 percent of the population and Hispanic women comprising 36 percent of the victims, despite making up just 28 percent of the population. This disproportionate effect also extends to the boroughs, with Brooklyn experiencing a 225 percent escalation in intimate partner homicides and the Bronx experiencing a 57 percent increase.³

The effects of domestic violence can trickle down through communities for generations. Children exposed to violence at a young age are more likely to experience mental and physical health issues, poor academic performance and high rates of both victimization and violent

¹ Jacquelyn C. Campbell et al., "Risk Factors for Femicide in Abusive Relationships: Results from a Multisite Case Control Study," *American Journal of Public Health* 93, no. 7 (July 2003): 1089–97

² Shwe, E., Carlson, S., & Pinder, H. (2024, February 10). In NYC, 2022 was a grim year for domestic violence homicide. Things have gotten worse.
<https://gothamist.com/news/in-nyc-2022-was-a-grim-year-for-domestic-violence-homicide-things-have-gotten-worse>

³ Graham, A. (2024, January 31). Domestic violence-related homicides skyrocket in NYC, according to new report.
https://www.amny.com/news/domestic-violence-homicides-skyrocket-nyc/?oref=csny_firstread_nl

offending.⁴ This creates generation cycles of violence and trauma within communities already struggling with systemic marginalization and divestment. With over 40 percent of all families in the Department of Homeless Services having experienced domestic violence, it is imperative that we streamline services for this vulnerable community.⁵

Low-income survivors of domestic violence face particularly precarious living situations. They may not have the means to afford another place to live, but for their own safety, are forced to leave a shared dwelling. This often results in survivors residing in shelter. However, many survivors we work with report feeling unsafe in shelter, fleeing one dangerous situation just to find themselves in another. Some have histories of past victimization in shelters, which dissuade them from leaving their current living situation, despite imminent danger. The limited number of available beds in domestic violence shelters further exacerbates the obstacles survivors and their children face when seeking refuge.

It is absolutely imperative that we work to improve the shelter system for survivors of domestic violence. Survivors should know that when they make the difficult choice to leave their abuser they have somewhere reliable and safe they and their children can stay. Easing this transition will result in more survivors finding safety and less lives lost.

Thank you for the opportunity to testify today. I appreciate the opportunity to lend my voice and experience to this pressing issue.

⁴ Department of Justice Office of Justice Programs. (2020, January 8). Children Exposed to Violence. <https://www.ojp.gov/program/programs/cev#:~:text=Children%20exposed%20to%20violence%20are%20at%20risk%20for%20physical%20injury,et%20al.%2C%202009>.

⁵ Iosso, C., & Rein, M. (2022, March). *Family Homelessness in New York City: What the Adams Administration Can Learn from Previous Mayoralities*. Institute for Children Poverty Homelessness. <https://www.icph.org/reports/family-homelessness-in-new-york-city-what-the-adams-administration-can-learn-from-previous-mayoralities/#introduction>



Testimony of Juan Diaz
Citizens' Committee for Children of New York
Submitted to The New York City Council Committees on General Welfare and Women
and Gender Equity
Oversight – Supporting Domestic Violence Survivors in NYC's Shelter System.
October 9th, 2024

Thank you, Chair Ayala and Chair Louis and the members of the Committees on General Welfare and Women and Gender Equity, for holding today's hearing on Supporting Domestic Violence Survivors in NYC's Shelter System.

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.

CCC is a steering committee member of the Family Homeless Coalition (FHC), a coalition comprised of 20 organizations representing service and housing providers, children's advocacy organizations, and people with lived experience with family homelessness. We are united by the goal of preventing family homelessness, improving the well-being of children and families in shelter, and supporting the long-term stability of families with children who leave shelter.

The recently released [New Destiny Report](#), *A Crisis Compounded: The Dual Crises of Domestic Violence and Homelessness*, reveals eye-opening facts about the damaging effects of domestic abuse, and brings to light the intersection of domestic violence, mental and physical harm, and housing and economic insecurity. The report reveals that in New York City, domestic violence continues to be the leading cause of shelter entry and homelessness among families with children.

Below are some key findings from the New Destiny report on the compounding effects of domestic violence and housing insecurity:

- More families with children enter DHS shelters due to domestic violence at 23% (2,911 families), compared to housing court evictions at 11%.
- Most individuals in HRA domestic violence shelters are children: in 2022, 58% of individuals in domestic violence shelters were younger than 18.

- Poverty is prevalent among Domestic Violence survivors, with more than 94% reporting economic abuse by their perpetrators.
- Survivors are 31% more likely to develop cardiovascular disease compared to those who have not been impacted by domestic violence, and over half of survivors experience posttraumatic stress disorder and depression.
- Domestic violence disproportionately impacts women of color in NYC. Between 2018 and 2022, most heads of household identified as female and more than 90% identified as either Black non-Hispanic or Hispanic.

In the face of the domestic violence crisis, CCC urges the City Administration to invest in programs and strategies that will accelerate DV survivor families housing stability and prevent shelter entry. We therefore urge you to consider the following actions:

- Work closely with HPD and other city agencies to fully enforce the recent inclusion of domestic survivor families in HPD homeless set-aside units.
- Expand CityFHEPS eligibility to include survivors fleeing abuse, regardless of immigration status. As [CCC's Keeping Track of Children](#) data book revealed, in FY23 over 16% of families with children that exited DHS shelter without a housing subsidy returned to shelter within 12 months, compared to less than 1% with a housing subsidy.
- Invest \$6 million in ENDDGender and Domestic Violence microgrant program. Advocates call for an increase of \$4.8 million to the next FY Budget to fully fund this much needed program.
- Include survivors as an eligible population for City-funded supportive housing, NYC 15/15.
- Prioritize access to Homebase services, which are the first source of assistance for DV survivors when they exit shelter and need aftercare services. The CBOs who administer Homebase are facing increasing demand for care, and the City must ensure they have adequate resources to serve DV survivors and other individuals and families seeking housing stability and financial assistance.

CCC also supports **Intro 2572 (Ayala)**, which would expand reporting on domestic violence shelter exits, and **Intro 2573 (Ayala)**, which would amend the existing reporting requirements for multi-agency emergency housing assistance to include reporting on applications for domestic violence emergency shelters and applications for domestic violence tier II shelters by household size.

Lastly, we urge the City Administration to continue making strides to improve social services delivery for all New Yorkers by enhancing technology services like ACCESS HRA and fully staffing social services agencies.

Thank you for your time and consideration.

Send to: testimony@council.nyc.gov

Testimony of Good Shepherd Services
Before the New York City Council's Committee on General Welfare, jointly with the
Committee on Women and Gender Equity

Submitted by
Debbe Donastorg, Program Director
Good Shepherd Services

October 9, 2024

Thank you, Chair Ayala and Chair Louis and the Members of the Committee on General Welfare, jointly with the Committee on Women and Gender Equity for the opportunity to testify on "supporting Domestic Violence survivors in NYC's shelter system."

My name is Debbe Donastorg, and I am the Program Director of Safe Homes Project, a Community Based Domestic Violence program, at Good Shepherd Services which operates both in Park Slope and at the Family Justice Center in Brooklyn.

Guided by social and racial justice, Good Shepherd Services (GSS) partners and grows with communities so that all NYC children, youth, and families succeed and thrive. We provide quality, effective services that deepen connections between family members, within schools, and among neighbors. We work closely with community leaders to advocate, both locally and nationally, on behalf of our participants to make New York City a better place to live and work.

Good Shepherd Safe Homes Project ("Safe Homes"), initiated in 1976, is a community-based advocacy and service program for survivors of gender-based violence. Through counseling, safety planning, support groups, emergency telephone hotline services, and legal and housing advocacy, Safe Homes supports survivors in their journeys to safety, healing, and stability. In Fiscal Year 2024, Safe Homes served 190 survivors. The program also offers training for

professional and community groups to educate and empower New Yorkers to have healthy relationships free of abuse.

The Safe Homes Project program works closely with the Family Justice Center in Brooklyn, receiving anywhere from 5-6 referrals daily. Referrals come from all over, including from DV and homeless shelters.

Some of the challenges facing the families we are supporting include:

- 1. Access to translation and language services**
- 2. Access to childcare so families can follow up with benefits and other appointments and seek employment.**
- 3. Busing for children to attend school. Families with children who need educational support are referred to the NYC Public Schools for safe school placement, however, there continues to be challenges with busing and the processing time to put busing in place.**
- 4. Access to legal immigration services**
- 5. Access to resources such as public assistance, housing, housing application support and housing vouchers**
- 6. Lack of trauma informed support for shelter staff. Shelter staff need to be trained in trauma informed care to best support their work. Considering that often staff are also credible messengers and survivors dealing with vicarious trauma this is even more critical.**

Most recently, Good Shepherd received a grant from the U.S. Department of Housing and Urban Development (HUD) to offer Rapid Rehousing for survivors of intimate partner violence. This program will connect survivors with permanent housing through a tailored package of assistance that may include time-limited financial assistance and supportive services. Families will be the lease holders and live independently while still receiving critical case management and services and after care support. This program will allow us to find apartments for families and pay their rent for two years including covering moving expenses and security deposits.

It is critical to invest in programs and support for shelters that are supporting Domestic Violence Survivors and their families in NYC's Shelter System as well

as programs such the Safe Homes Project that are extending that support outside of the Shelter system.

Thank you for the opportunity to testify.



HOMELESS SERVICES UNITED

307 W. 38TH STREET, 4TH FLOOR
NEW YORK, NY 10018
T 212-367-1589
www.HSUnited.org

**Homeless Services United’s Written Testimony for the 10/9/24 Joint Oversight Hearing
on Supporting Domestic Violence Survivors in the NYC’s Shelter System
by the NYC Council Committees on General Welfare and Women and Gender Equity**

Thank you, Deputy Speaker Ayala, Chair Louis, members of the Committee on General Welfare and Women and Gender Equity Committees, and other distinguished members of the Council for holding this critical oversight hearing today on supporting domestic violence survivors in our city's shelter system. 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, homeless prevention services and for immediate access to safe, decent, emergency, and transitional housing, outreach, and drop-in services for homeless New Yorkers.

The city’s domestic violence shelter system, managed by the Human Resources Administration (HRA), continues to operate at or near capacity, with over 10,842 survivors utilizing domestic violence emergency shelters last year. However, despite the clear need for these life-saving services, there are significant challenges with timely access to permanent housing resources.

Delays in processing Cash Assistance (CA) and CityFHEPS rental assistance applications create barriers to permanent housing, contributing to longer stays in shelter, and survivors transitioning to other shelter systems upon reaching the state-mandated 180-day limit.

Survivors of domestic violence like many others seeking assistance from HRA are subject to prolonged delays in processing both Cash Assistance (CA) and CityFHEPS rental assistance applications. HRA’s Benefits Access Centers (BACs) face significant backlogs in processing CA cases, including rebudgeting household income, adding or removing household members from the case, and updating submitted documentation. These delays can lead to the premature closure or sanctioning of public benefits cases which are crucial to stabilizing the household and prevent the processing of CityFHEPS and FHEPS applications or denial of emergency assistance applications.

A recent report by New Destiny Housing¹ found that between 2018 and 2023, the number of survivors exiting HRA domestic violence emergency shelters for permanent housing decreased by 18%. Survivors were five times more likely to move from one shelter to another than to permanent housing. **In 2023, 50% of survivors exited emergency shelter to another shelter system while only 9% managed to secure permanent housing, with just 74 survivor-led households able to access an apartment with a rental subsidy like CityFHEPS.** Although survivors are technically eligible for rental assistance through CityFHEPS or FHEPS upon entering shelter, it can take months before they receive their voucher, longer than the maximum length of stay in domestic violence shelters.

¹New Destiny Housing Report: *A Crisis Compounded: The Dual Crises of Domestic Violence and Homelessness* <https://newdestinyhousing.org/dv-report/>



HOMELESS SERVICES UNITED

307 W. 38TH STREET, 4TH FLOOR
NEW YORK, NY 10018
T 212-367-1589
www.HSUnited.org

One key barrier to timely access to CityFHEPS is that a household must maintain an active CA case not in "sanctioned" status to apply for the voucher. If they exceed income eligibility for ongoing Cash Assistance, they must apply for Single Issue (SI) status, which automatically closes within 30 days. During this period, applicants are required to complete a telephone interview, a daunting task given HRA's hours-long wait times for phone responses. After the interview, HRA's Rental Assistance Processing (RAP) Unit must process the CityFHEPS application. If the CA case closes before the RAP Unit can process the CityFHEPS application, the applicant must begin the public benefits process anew, including reapplying for CA in SI status at the BAC, completing another phone interview, and hoping the RAP Unit can process the application before the SI case closes again.

For State FHEPS, maintaining an active Cash Assistance case is even more critical. Having an active CA case is both an initial eligibility criterion and required throughout the lifetime of the voucher. If a FHEPS voucher holder's CA case closes or is sanctioned, the change in status of their CA case can cause their FHEPS to "fall off" the budget, meaning that their voucher stops paying their rent, putting the family's housing at risk.

This cycle of reapplication and delays is echoed in feedback from domestic violence service providers. Survivors, already facing the trauma of abuse and homelessness, are forced to endure a labyrinth of bureaucratic inefficiencies that delay their access to permanent housing and can further jeopardize the stability of their housing after they exit shelter.

Support for Preconsidered Bills to Improve Transparency and Accountability

In addition to addressing these critical processing delays, HSU supports the intent of the following preconsidered bills, which seek to increase transparency of the domestic violence shelter system and help the City allocate resources more effectively:

- **T2024-2572:** HSU supports this bill which would expand reporting requirements for exits from domestic violence shelters, including both HRA domestic violence emergency shelters and HRA domestic violence Tier II shelters and increases the reporting frequency from annual to monthly. These changes will provide a clearer picture of where survivors are exiting to throughout the year, whether into permanent housing, DHS shelters, or other settings. The bill will also track utilization rates of different rental assistance programs, which can help identify gaps in services and inform where additional housing resources are needed.
- **T2024-2573:** HSU supports the intent of this bill which would amend existing reporting requirements regarding multi-agency shelter applications to include reporting on applications for both HRA domestic violence emergency shelters and HRA domestic violence Tier II shelters. Accurate data is necessary to understand the need for shelter, and as the Council well knows, these specialized shelters has limited capacity and few vacancies. HSU does have concerns how the data would be sourced due to the non-centralized nature of referrals and intakes. Publicly available data should be utilized



HOMELESS SERVICES UNITED

307 W. 38TH STREET, 4TH FLOOR
NEW YORK, NY 10018
T 212-367-1589
www.HSUnited.org

wherever possible to track demand for domestic violence shelters. **If additional data is required beyond publicly available data, we urge there be careful consideration to ensure that organizations making referrals and intake into the domestic violence system are protected from undue burdens of additional reporting requirements.**

Homeless Services United welcomes the Council's continued leadership and support in calling on the City and HRA to expeditiously address delays accessing Cash Assistance and rental assistance vouchers which are critical for stabilizing survivors fleeing their abusers and others experiencing homelessness and housing instability. Our public benefits safety net and housing resources must be resourced and able to provide support to them in their moment of crisis to shorten and avert entry into shelter wherever possible. HSU looks forward to continuing to work with the Council in strengthening the safety net for all New Yorkers. Thank you for the opportunity to submit testimony. If you have any questions, please email me at elee@hsunited.org



NYC Council Hearing Supporting Domestic Violence Survivors in NYC's Shelter System Committees on General Welfare & Women and Gender Equity

Testimony by the Korean American Family Service Center and The Collective

Good afternoon, my name is Rachel Kang, Director of Intervention Services at the Korean American Family Service Center (KAFSC) and I will be testifying today on behalf of KAFSC and The Collective, a coalition of gender based violence organizations serving immigrant communities throughout New York City that also includes Sakhi for South Asian Survivors, Sauti Yetu Center for African Women and Families, Violence Intervention Program (VIP), and Womankind. KAFSC is an organization dedicated to empowering immigrant survivors of gender-based violence through comprehensive services - last year alone, KAFSC provided safe housing and support to over **200** survivors in our shelter and transitional housing programs. We also provide a 24-hour multilingual hotline which connects survivors to housing, counseling, and legal services. Last year, VIP also sheltered 117 adults and 147 children.

While we commend the city for recognizing the ongoing needs for language access in shelters, the reality is that many GBV survivors are still struggling to connect with these services and face challenges when navigating the shelter system, where the language spoken or the cultural context of their experience is not fully understood or accommodated.

Many survivors experience gaps in the availability of city interpreters, and in the cultural sensitivity training for shelter staff. This lack of language access prevents survivors from even learning about shelter programs, or worse, from understanding their rights and options.

We urge the city to increase its funding for DV shelters that serve immigrant communities, with a focus on improving both language access and cultural competency training. In addition to increasing capacity—these shelters should be truly accessible to all New Yorkers, regardless of language or cultural background.

At the same time, many survivors from undocumented families have no path to long-term, safe housing. These survivors are also often ineligible for subsidies and benefits, which creates challenges for seeking independence and new housing. Those who are eligible for subsidies still face steep challenges in finding affordable housing after shelter, whereas families with no vouchers or subsidies end up chronically homeless.

In addition to the client experience, organizations that provide housing support to survivors and operate DV shelters regularly face obstacles in coordinating with city agencies. One major challenge is the delay in processing housing placements, particularly when working with immigrant survivors. It can also be difficult to obtain timely responses from city agencies when



there are urgent situations involving DV survivors, such as the need for immediate shelter placements. These delays can create significant risks for the survivor, increasing their vulnerability and potentially exposing them to further harm, while also resulting in frustration and confusion.

There have been positive changes seen at DV shelters as well, including the mental health collaboration with H+H, which has been very successful. Shelter residents love being able to access mental health care for themselves and their children, and we encourage this to be universal at all DV Shelters and safe dwellings if it is not yet.

With respect to the two new DV shelter reporting bills being introduced, we thank CM Ayala for her efforts to increase awareness of how many and how often survivors are exiting shelter. Currently, DV shelter providers report to OCFS on denials and admissions, but not on exits, so this would create a new layer of reporting to HRA by DV shelters, and we encourage any new requirements for staff to be compensated by HRA.

We believe these issues can be addressed by strengthening partnerships between city agencies and community-based organizations like KAFSC and the members of The Collective. By working more closely together, we can ensure that survivors receive timely, comprehensive support and are not left waiting for critical services.

Thank you for the opportunity to testify today. I am happy to answer any questions you may have.



new destiny
housing

TESTIMONY OF NEW DESTINY HOUSING TO THE NEW YORK CITY COUNCIL COMMITTEES ON GENERAL WELFARE AND WOMEN AND GENDER EQUITY

Gabriela Sandoval Requena, Director of Policy and Communications

October 9, 2024

Thank you, Chair Ayala, Chair Louis, members of the City Council General Welfare and Women and Gender Equity Committees, and Council staff for holding this important oversight hearing and for the opportunity to submit written testimony.

Founded in 1994, New Destiny's mission is to end the cycle of domestic violence and homelessness for low-income families and individuals by developing and connecting them to safe, permanent, affordable housing and services.

New Destiny is the only organization in New York City solely dedicated to the solution of permanent housing for survivors. We are the largest provider of supportive housing for domestic violence survivors in New York and a leading advocate in the effort to increase housing resources for New Yorkers impacted by domestic violence. To learn more, please see our [policy recommendations](#).

We are also a co-convenor of the [Family Homelessness Coalition \(FHC\)](#), a collective of mothers with lived experience of homelessness and organizations committed to tackling homelessness among families in our city, as well as a member of the Supportive Housing Network of New York.

NEW DESTINY'S 2024 REPORT ON DOMESTIC VIOLENCE AND HOMELESSNESS

On July 18, 2024, New Destiny released the report: [A Crisis Compounded: The Dual Crises of Domestic Violence and Homelessness](#), which documents the struggles and barriers that domestic violence survivors face when trying to secure safe, affordable housing after escaping from abusive relationships and the long-term impact abuse has on survivors. It also highlights the steps New York City and State can take to increase access to housing resources and help move survivors quickly from shelters to permanent homes.

This month marks the fifth anniversary of the release of the New York City Comptroller's *Housing Survivors* report, which showed for the first time that domestic violence is a leading driver of homelessness. With the recent global pandemic and the economic downturn that followed, New Destiny felt it was time to analyze new data and reassess the opportunities and challenges facing survivors from accessing homes where they can rebuild their lives.

Key Findings

Domestic violence and homelessness are inherently linked. In the United States, 80% of women with children struggling with homelessness have also experienced domestic violence, and 57%

of all women experiencing homelessness report domestic violence as the immediate cause of their homelessness.

This is particularly true in New York State, where more than 1 in 3 individuals will experience abuse by an intimate partner in their lifetime. New York ranks first in demand for domestic violence services in the country and requests for support and advocacy related to housing are the most sought.

Access to safe and affordable housing is one of survivors' biggest, most urgent concerns and it often determines whether they leave their abuser and stay alive. Without housing, it is impossible for survivors to address the long-lasting health consequences of the abuse. Survivors are 31% more likely to develop cardiovascular disease and 51% more likely to develop type 2 diabetes compared to those who have not been impacted by domestic violence. Also, new research shows that survivors sustain head trauma more often than football players, but their head injuries are rarely diagnosed and properly treated. This happens to such an extent that the Centers for Disease Prevention and Control now recognize intimate partner violence as a leading cause of traumatic brain injury. For children who experience or witness abuse, a safe home is essential to heal and break the cycle of violence.

In New York City, the police file 1 domestic violence incident report every 2 minutes and the 24-hour hotline receives 1 call every 6 minutes. For survivors, remaining in an abusive situation can mean death. Despite a general decline in violent crime in our City, domestic violence homicides increased by nearly 30% between 2021 and 2022.

Since domestic violence is a leading cause of homelessness year after year, the City's domestic violence shelter system, managed by the Human Resources Administration (HRA), is constantly at or near capacity. Meanwhile, thousands more families in the separate Department of Homeless Services (DHS) shelters, identify domestic violence rather than evictions as the main reason for their homelessness.

To complete this report, New Destiny analyzed 2018 through 2023 data obtained through Freedom of Information Law requests from HRA, DHS, and other agencies, as well as qualitative information from 24 domestic violence service providers in New York City. Some of the key findings are:

- More families with children enter DHS shelters due to domestic violence than evictions. In Fiscal Year (FY) 2023, 20.3% of the families with kids population entered DHS shelters due to abuse, with evictions responsible for 11.1%. More than 1 in 5 families with kids in the DHS shelter system (2,911 families) identify domestic violence as the reason for their homelessness.
- In calendar year 2023, 10,842 survivors sought refuge in the separate HRA domestic violence shelter system, a slight increase over calendar year 2022.
- In 2023, 50% of NYC domestic violence hotline callers in need of shelter were single adults, yet only 18% were ultimately linked to a shelter.
- Most people in HRA domestic violence shelter are children. In 2022, 58% were younger than 18, with kids under 5 representing 28% of the total population, the largest age group.

- The vast majority of heads of households in the HRA domestic violence shelter are women of color. In 2022, 97% of heads of households identified as female and close to 60% self-reported as Black non-Hispanic and 33% as Hispanic.
- The number of survivor-led households leaving HRA domestic violence emergency shelter for permanent homes has decreased by 18% between 2018 and 2023.
- With so little housing available to homeless domestic violence survivors, they are more likely to move from shelter to shelter instead of housing. Between 2018 and 2023, more than half of survivors left HRA domestic violence emergency shelter for another shelter upon reaching the State-mandated 180-day limit.
 - Of the 2,284 survivor-led households who exited emergency shelter in 2023, 50% went to another shelter: 24% to the strained DHS system and 26% to HRA domestic violence Tier II shelters,
 - Only 9%, or 208 survivor-led households, moved to a permanent home. Of those, 11 moved to supportive housing, 13 to a public housing apartment, 74 to an apartment with a rental subsidy, and 110 to an apartment without a subsidy.
- Survivors with families who time out of HRA emergency domestic violence shelter without a Tier II shelter placement must apply for the separate DHS shelter – at risk of being turned away. In 2023, 412 survivors with children had to apply for shelter and demonstrate eligibility without a secure placement.
- The effects of abuse and homelessness are intergenerational. A boy who sees his mother being abused is 10 times more likely to abuse his partner as an adult, and a girl who grows up in an abusive home is more than 6 times more likely to be sexually abused than a girl who grows up in a non-abusive home. Among families with children in DHS shelter, 1 in 6 heads of households were in shelter as children.

RECOMMENDATIONS

New Destiny’s report provides an overview of existing programs available to survivors in New York City, explores their limitations, and offers a set of policy and budget recommendations to effectively unlock a path for them to attain long-term housing stability.

These recommendations are not meant to be comprehensive, but priority actions. They are all not only reasonable to administer and cost-effective, but they will have an immediate impact on thousands of domestic violence survivors by averting or mitigating the additional crisis of homelessness for them and their families.

We are only including the reports’ recommendations for New York City in our testimony, with updated language where applicable given the City’s recent actions. For the complete list of recommendations, please see the [report](#).

1. EXPAND ACCESS TO HOUSING RESOURCES AND SERVICES:

1.a. Deliver on the commitment to open-up HPD homeless set-asides. New York City must deliver on the promises to expand access to affordable homes funded by HPD that are targeted for homeless New Yorkers, commonly known as HPD homeless set-asides, to

individuals and families in all five shelter systems, including survivors in the HRA domestic violence shelter. Every year the City creates more than one thousand new homes that are specifically designated for New Yorkers in shelters, yet only those in DHS shelter are allowed to move there, unless a developer “volunteers” the units to other populations. By opening up this vital source of affordable housing, more survivors will be able to transition from HRA emergency domestic violence shelters to a safe home instead of another shelter, and the apartments will be filled substantially faster.

1.b. Pair all rental assistance programs with housing navigation and supportive services. Ensure that all rental assistance programs include funding for voluntary housing search assistance and case management. Navigating the rental market can be daunting for voucher holders, especially in a city like New York, where the vacancy rate is extremely low. The ability to work with a housing navigator not only expedites the process of finding a safe home that meets their needs, but it can help survivors address source of income discrimination, resolve bureaucratic problems with the agency issuing the voucher, and better understand their tenant rights and responsibilities. Similarly, timely access to services, such as mental and physical health care or financial coaching helps survivors address the multiple effects of the abuse as they rebuild their lives. New York City and New York State must make their rental assistance programs more efficient by including funding to provide voluntary and individualized support that help voucher holders find housing and access the services they need to remain stably housed.

1.c. Expand CityFHEPS eligibility to include survivors fleeing abuse, regardless of immigration status. A shelter stay is often required to qualify for rental assistance programs, which effectively excludes survivors who are fleeing abuse and have never spent time in shelter. As it is the case for countless survivors without children, who are often members of the LGBTQIA+ community, trafficking survivors, and older adults, and often unable to access domestic violence emergency shelter. Expanding all voucher program eligibility to include survivors who are escaping an abusive situation and regardless of family size, as the federal EHV program did, is vital. In 2023, the New York City Council passed a legislative package that scaled up CityFHEPS to include households at risk of eviction or experiencing homelessness, among other key enhancements. Such modification would expand access to CityFHEPS for survivors who are fleeing domestic violence. However, Mayor Adams refuses to implement the bills and the case is currently being litigated in court. The Adams administration must fully enact the CityFHEPS legislative package to ensure survivors fleeing abuse.

For noncitizen New Yorkers or those in mixed-status households, where at least one member of the family is a U.S. citizen or eligible immigrant, it can be difficult – if not impossible – to access sufficient housing support. This includes countless immigrant survivors of domestic violence, who lack equitable access to housing resources and, as a result, tend to stay in shelter for longer. During the pandemic, the State Legislature took direct, bold action to assist undocumented immigrants and their families by creating the historic Excluded Workers Fund. Now, it is time for New York City and New York State to work together to expand CityFHEPS to all who qualify, regardless of immigration status.

1.e. Allow survivors in HRA Tier II shelters access to the SHARE program: Undocumented survivors may spend years in HRA Tier II domestic violence shelters because they are not able to access rental assistance programs. The City must allow undocumented

survivors in HRA Tier II domestic violence shelters access to the newly established SHARE program, which is only available to undocumented long-stayers in the DHS shelter system. Similarly, the State should ensure that undocumented domestic violence survivors across outside New York City can access RSP vouchers.

1.f. Address NYCHA emergency transfer delays: New York City must adhere to federal VAWA regulations and address the significant delays in NYCHA emergency transfers that put survivors' lives in jeopardy. The City must ensure timely completion of repairs of vacant units, prioritize domestic violence emergency transfers, and assess alternative resources, such as Section 8, for pending transfers waiting over 12 months who are willing to relocate outside of public housing.

2. ENSURE SUPPORTIVE HOUSING IS ACCESSIBLE AND ADEQUATELY FUNDED:

2.c. UPDATED: Improve City-funded supportive housing, NYC 15/15: Over the summer, the Adams administration delivered on their commitment to include survivors as an eligible population for City-funded supportive housing, NYC 15/15, by removing eligibility criteria that made most survivors – even those with the greatest need for long-term services – ineligible. Now, survivors with children that have gone through the double trauma of abuse and homelessness will be able to access the housing and services they need to address the long-lasting physical, psychological, and financial consequences of abuse.

We urge the City to increase overall access to supportive housing by building more, and relying less on an already crowded housing market, to house New York's most vulnerable residents. New Destiny supports the Supportive Housing Network of New York's [recommendations](#) to improve NYC 15/15, especially the ask to develop additional congregate units above the original 7,500 allocation. NYC 15/15 is in its eighth year and falling below its target. The city has only awarded 17% of scattered site allocation, whereas 80% of congregate units have been awarded. Similarly, we encourage the City to explore opening up NYC 15/15 to single survivors.

3. INCREASE INVESTMENT IN MICROGRANTS/FLEXIBLE FUNDING:

3.a. Invest \$6 million in ENDGBV's microgrant program: Nearly all survivors face economic abuse, and more than half endure coerced debt, with long-lasting detrimental effects. An immediate, but otherwise manageable financial or health crisis can quickly snowball into a catastrophe causing homelessness for survivors. In 2022, New York City took a major step in homelessness prevention by creating a housing stability program for domestic violence survivors, also known as microgrants. The program provides low-barrier grants to survivors and connects them to supportive services, with the goal of helping them maintain housing. During COVID, a privately funded microgrant pilot, overseen by the Mayor's Office to End Domestic and Gender-Based Violence and administered by Sanctuary for Families, demonstrated that flexible funding can significantly improve survivors' financial situation, help them remain housed, and foster financial stability. The pilot illustrated the high demand for low-barrier financial support among survivors of domestic violence in New York City. The \$500,000 for the pilot was quickly depleted and forced the program to cease receiving applications in less than 2 months.

Based on existing, but limited, federal service funding from the United States Department of Housing and Urban Development, it is estimated that the average microgrant amount requested will be about \$2,000. Considering that and annual domestic violence service data from the New York City Family Justice Centers, the City must increase funding for the program to [at least \\$6 million](#).

4. IMPROVE DATA COLLECTION AND REPORTING:

4.a. Improve Local Law 83 reporting: We cannot solve a problem that is not measured correctly. New York City must improve its data collection methods on HRA domestic violence exits by increasing the frequency of the Local Law 83 of 2018 reports from annual to monthly, including exits from Tier II domestic violence shelters, and including all permanent housing programs accurately. The City must produce a report that captures precise data on housing placements to assess the effectiveness of programs and the need for additional resources. Additionally, Local Law 83 findings should be included in the annual Mayor’s Management Report.

4.b. Include HRA domestic violence shelter demand to reflect the housing needs of single survivors: Housing developers build new projects based on documented need. Since the domestic violence shelter system in New York was created decades ago specifically for families with children, single survivors, who are often members of the LGBTQIA+ community, trafficking survivors, and older adults, are unable to access domestic violence emergency shelter and consequently permanent housing. The City must incorporate data on HRA emergency domestic violence shelter demand by household size on the monthly Temporary Housing Usage reports, also known as Local Law 79 of 2022, as well as the annual Mayor’s Management Report. This will help increase visibility of single survivors and better track the need for permanent housing.

We are grateful to Chair Ayala and the City Council for introducing legislation in response to recommendations 4.a. and 4.b., with Intros [1070](#) and [1071](#) respectively. We fully support the intent of these bills and look forward to working with the Council and peer domestic violence shelter providers to figure out the best data sourcing methodology.

Thank you for convening this important hearing and the opportunity to submit written testimony. New Destiny looks forward to continuing to collaborate with the Council.

Gabriela Sandoval Requena
Director of Policy and Communications
gsrequena@newdestinyhousing.org

**Testimony by New York Legal Assistance Group (NYLAG)
before the NYC Council Committee on Women and Gender Equity regarding Supporting
Domestic Violence Survivors in the New York City’s Shelter System**

October 9, 2024

Chair Louis, Council Members, and Staff, thank you for the opportunity to testify before the Committee on Women and Gender Equity on how we can best support domestic violence survivors in New York City’s shelter system. My name is Shani Adess, I am a Vice President at the New York Legal Assistance Group (NYLAG). Prior to this role, I spent my career providing services to survivors of domestic violence.

NYLAG uses the power of the law to help New Yorkers in need combat social, racial, and economic injustice. We address emerging and urgent legal needs with comprehensive, free civil legal services, impact litigation, financial counseling, policy advocacy, and community education. NYLAG serves survivors of domestic violence across our practice areas, including in our domestic violence law unit- a team focused on providing comprehensive safety planning, family, matrimonial, appellate, and immigration law services for survivors, as well as our shelter advocacy, eviction defense, homeowner protection, public benefits, special education, legal health, consumer protection, and immigrant protection teams.

We believe one central tenant to survivor services is expanding options for survivors. The dynamic of domestic violence is defined by power and control: wherein one individual coerces, isolates, or harms another as they take or attempt to take power or control away from them. Our services should aim to give power back to survivors. To do this, we need resources- including shelters- that are responsive to the needs of survivors and their families. We need shelters that are

accessible and inclusive, with rules and processes that are uniform, transparent, and trauma-informed.

I. Accessibility and Inclusivity

We do not have enough beds and spaces for domestic violence survivors in New York City. We need more. We also need more spaces that aren't solely able to support cis-gender female survivors with young children. The lack of access to dv shelter for non-binary or trans individuals, survivors with three or more children or adult children who are central to their household and live with them, single survivors without children, survivors with older male-identifying children, and survivors fleeing from non-intimate partner violence creates heightened obstacles to accessing safety for these groups. Similarly, survivors who have religious and dietary restrictions are most often not accommodated by the Domestic Violence (DV) shelter system, as many DV-shelters cannot at present meet those needs.

Our DV-shelter system must be expanded to increase capacity overall, and expanded to include capacity to serve survivors from all identities and backgrounds. Survivors calling our city's domestic violence shelter hotline and being told there are no beds available, or none that fit them or their families' needs, limit the safety planning options a survivor may have when our goal is to expand it.

At NYLAG, we see first-hand survivors navigating the incredibly difficult decision of whether to leave their home, often many of their belongings, their neighborhood, and the community or financial stability they may currently have to find safety. We have seen clients weigh accessing shelter due to not only the initial uprooting of themselves and their kids, but also the ongoing risk of instability through constant shelter moves. There is not enough affordable housing in New York City. Survivors, especially those who are low income, who

experienced financial abuse, who endured significant trauma or harm they are healing from, or who are relying on our protracted systems like our courts to obtain support or access to assets need time. If after entering shelter, 180 days in they yet again must change schools, jobs, or find new resources for services whether for counseling or a child's special education or medical needs, there may be a chilling effect on survivors who are considering fleeing, as well as long term tangible consequences to their ability to achieve stability and security. Stays in DV-shelter should not be time limited, and in no circumstance should that time limit be 180-days.

Tracking data on demand for emergency and tier II shelters will help better inform how our systems can ensure that these options are responsive to the needs expressed by the survivors and inform our future decisions and investments. Obtaining feedback from survivors in DV and Department of Homeless Services (DHS) Shelters, will also provide essential information on how our shelters are meeting and not meeting the varied needs of survivors and their families.

II. Stability through Uniformity & Transparency

Another risk that survivors in DV shelters face towards shelter instability comes from the lack of transparency and uniformity on shelter rules. This includes processes that should support survivors and their children: like access to reasonable accommodations. Unlike the DHS shelter system, the different shelters in the DV system seem to have different rules. For instance, there is no centralized system for residents of DV shelters to request reasonable accommodation for a disability. Residents must submit the requests to their own shelters and there is no centralized system for docketing and review. This lack of uniformity lends itself to inconsistent and perhaps discriminatory determinations. The DV system must have uniform standards, and those standards must be uniformly implemented.

In addition to uniformity, shelter rules must be transparent. We urge shelters be mandated to clearly post and explain 1:1 to all shelter residents in their preferred languages shelter rules, as

violation of these rules have a dire consequence: expulsion from the system. Survivors often do not understand the rules regarding the secrecy of the shelter locations and where they need to be picked up and dropped off to maintain privacy. Even if they have heard the rules, sometimes they are given contradicting orders from courts, that require them to be out past curfew or allow one of the children listed as a shelter resident to sleep outside of the shelter with the other parent for some time. Therefore, survivors may violate rules without intending to or realizing that they have done so. Once a shelter provider deems a survivor to have violated the rules, expulsion from that shelter (and as a practical matter, the entire DV-system), is solely at the discretion of that provider, without an opportunity to appeal. In addition to transparent rules, such rules need to consider the lived experiences of survivors: which include needing support, as well as compliance with court orders individuals in crisis.

III. Trauma Informed Processes

NYLAG is appreciative to hear that considerations for new shelters, including emergency shelters, are underway. Increasing the number of, access to, and timelines for remaining in shelter is necessary. In the meantime, we know that many DV survivors and families entering the DHS shelters are survivors of domestic violence. This includes overflow, survivors never able to enter the DV-shelter system because of lack of space, as well as people who have timed out of their DV-shelter stay.

Survivors who are not able to enter the DV-shelter system, must be screened to enter DHS shelter, typically by applying at DHS' Prevention Assistance and Temporary Housing (PATH) intake centers. What is more, survivors who were already screened and placed in DV shelters who have timed out of their stay have to be intaked again, before transferring to a DHS shelter. Previously, there was a seamless transition (albeit disruptive to the stability of the family

as noted above) wherein a survivor would be transferred without necessitating another intake. We urge a return to this prior policy and practice.

If there will be overflow to the DHS system, that system must be structured to ensure the DHS system is accessible and is able to engage with trauma survivors. NYLAG strongly urges review of the PATH intake system. Current intake screenings are in public, in front of children. Failing to provide trauma-informed, private screenings inhibit survivors from continuing with the process, or from sharing or disclosing the physical violence and/or other traumatic events that led them there.

Moreover, the shelters in the DHS system are not in confidential locations and do not provide services tailored to protecting the safety of survivors of domestic violence, despite housing them. Many survivors may decide not to leave an abusive relationship to enter the DHS system because they fear they are going from one unsafe location to another, especially since they are at their most vulnerable for lethal intimate partner violence at the time of separation.

We are grateful to the Chair, Committee, and Council Members for continuing to look to how we can better support survivors in having shelter be an accessible, inclusive, and stabilizing option that they may consider and use when determining what they and their children may need. We hope you will consider implementing some of the above recommendations and welcome the opportunity to continue to discuss this important issue with the Committee further.

Respectfully,

Shani Adess
New York Legal Assistance Group

**Testimony of
Shanequa Holiday, Associate Vice President
DV Shelter Programs
Safe Horizon**

**Committee on General Welfare
Committee on Women & Gender Equity**

**Oversight: Supporting Domestic Violence Survivors in NYC's
Shelter System**

Wednesday, October 9th, 2024

Good afternoon, and thank you for inviting me to testify before your committees today. My name is Shanequa Holiday, and I am an Associate Vice President for DV Shelters at Safe Horizon, the nation's largest nonprofit victim assistance organization. Safe Horizon offers a client-centered, trauma-informed response to 250,000 New Yorkers each year who have experienced violence or abuse. We use a lens of racial equity and justice to guide our work with clients, with each other, and in developing the public policy positions we hold.

We are grateful the Committees are looking at how best to support domestic violence survivors in New York City's shelter system. Safe Horizon operates eight emergency and transitional domestic violence shelters that provide welcoming, supportive and safe spaces to live. Our goal is to help survivors and their families get the resources they need to heal and thrive. We do this by offering concrete needs such as childcare and economic empowerment, job placement and housing assistance. We also provide case management, support groups, legal help and group/community activities.

SAFE Shelter Act

Safe Horizon helped draft and then pass state legislation known as the SAFE Shelter Act, which will increase access to domestic violence shelter for single adult survivors. This legislation, sponsored by Assembly Member Andrew Hevesi and State Senator Andrew Gounardes, would provide the funding flexibility shelter providers desperately need to house many more single adult survivors of trafficking and domestic and gender-based violence. That flexibility would empower the sector and help ensure that all survivors, regardless of age, sexual orientation, gender identity, or family status, have equal access to life-saving temporary housing and support.

I would like to point out a few recent developments in HRA's DV Shelter Procedures that have the potential to be beneficial to the operation of our shelters.

These changes, while seemingly small, will help reduce unnecessary and burdensome administrative burdens on both shelter residents and providers, and we are grateful to HRA for listening to the concerns of our community and implementing these common-sense changes.

- The Interactive Voice Response System (IVRS) – In July 2023, the HRA Domestic Violence Services department expanded on the use of this system to a significant number of DV Shelters across New York City that they had been piloting in select shelters. The system allows clients to call in directly from designated phones at the DV location (sometimes in their units) within a certain window to submit their attendance in shelter for the day. The system was proposed by HRA to simplify the attendance tracking process, reduce administrative burdens, and enhance the overall efficiency of services.
- HRA has extended the time to submit attendance daily in DV shelter to 2:00pm to address the varying needs of survivors in shelter. The previous cut off time was 10:00am. This development allows DV shelters to be more client centered around the intersectionality of survivor presence in shelter and their daily living.
- The most recent development that has been communicated by HRA is the discontinuation of the requirement to submit the daily attendance sheets via email and eFax to the billing liaison for each shelter. This helps to reduce delays in attendance confirmations for facilities which improves utilization rates and increases productivity of billing submission and reconciliation



PO Box 1406
Wall Street Station
New York, NY 10268-1406
Tel. 212.349.6009 Fax 212.349.6810
www.sanctuaryforfamilies.org

**Testimony of Kameeza Nizam-Chattoo
before The New York City Council
Committee on Women & Gender Equity and Committee on General Welfare
October 9, 2024
SUBMITTED TESTIMONY**

Good morning. My name is Kameeza Nizam-Chattoo, and I am Senior Deputy Director of Residential Services at Sanctuary for Families, New York State's largest provider of comprehensive services exclusively for gender violence survivors and their children. As an agency that has run domestic violence emergency and Tier II shelters for over three decades, we are grateful for the opportunity to testify on the critical topic of supporting DV victims in the City's shelter system. Our special thanks to Council Members Farah Louis and Diana Ayala, Chairs of the Committees on Women and Gender Equity and General Welfare, for calling this hearing, and for their advocacy on behalf of marginalized gender violence survivors. We also thank Chair Ayala for introducing the two bills being discussed today (Reso. 2572 and 2573)—which Sanctuary strongly supports, as they are critical to better quantifying the demand for DV shelters among various underserved populations.

Last year, Sanctuary provided confidential shelter and supportive services to 436 adults and children at our five shelters—four small crisis shelters and Sarah Burke House, our 58-family Tier II shelter that was the state's first DV transitional shelter when it opened its doors in 1992. Like all residential service providers, Sanctuary makes every effort to maximize our shelter occupancy. But the city's DV shelter system was designed for women with minor children fleeing abuse. As a result, single survivors such as LBGQTQIA+, trafficking, and older adults are often left out in the cold. In 2023, according to data from the NYC Domestic Violence Hotline, 50% of calls seeking shelter were from single survivors, yet just 18% of those were connected to shelter—compared to approximately 70% of survivors with one or two children. This pushes single survivors to remain in unsafe living situations, or into the general homeless system, which lacks both confidentiality and trauma-informed care.

The “heads in beds” per diem reimbursement model creates a serious financial dilemma for family shelter providers, as they lose significant revenue every time they place single adults in units earmarked for families. For as long as the single individual remains in shelter, the empty bed(s) will not be reimbursed. Regularly admitting single survivors is simply not financially sustainable. We thank the City Council for its support of the S.A.F.E. Shelter Act passed by the State legislature in June, which would ensure that OCFS reimburses shelter providers when a room intended to accommodate two family members is used to house a single adult. Ultimately, we would like to see three-person units included in this policy as well. We urge continued pressure on the Governor to sign this bill into law.

While these fixes would go a long way toward making the shelter system more equitable and accessible for individual survivors—if the Governor signs them into law—the per-diem reimbursement model poses other financial challenges for shelter service providers: for instance, when residents must spend nights away from shelter, such as when they are hospitalized or need to be out of town for valid reasons such as bereavement. A short reimbursement window is granted for hospitalizations (10 days), but there are no provisions for longer hospital stays or other justifiable reasons for absence. Moreover, the per-diem system fails to take into account the full cost of serving abuse survivors, relying instead on an antiquated funding model that funds shelters based on whether a bed happens to be filled each night. The full costs of assisting survivors, like child care, trauma-informed counseling, and case management services cannot be adequately funded based on this model.

Another critical issue that affects shelter residents is the State public assistance programs, intended to provide financial help to abuse survivors as they work toward economic stability and independence. These benefits have not been increased for years, or even decades: the basic allowance for food and other necessities was last increased in 2012; the home energy allowance has not been increased since the 1980s; and the shelter allowance has remained the same for adult-only households since 1988 and for families with children since 2003. Currently, a single mother with two children in Manhattan receives a shelter allowance of just \$400 per month. With this in mind, we support New Destiny’s proposal to urge the Senate and the Assembly to pass A05543 (Rosenthal) /

S2982 (Kavanagh), which would increase the shelter allowance to 100% of federal fair market rates and help ensure that individuals can access safe and stable housing. We also support New Destiny's proposal to increase the basic needs allowance to keep pace with inflation.

The situation for shelter residents when they exit shelter is dire. According to a recent study by New Destiny, between 2018 and 2023, just 9% of shelter residents exited shelter into permanent housing—due in part to the scarcity of affordable housing in New York City, but also the paucity of available rental subsidies. Noncitizen immigrants may not be eligible for rental subsidies at all. We urge the Council to strongly support the Housing Access Voucher Program (HAVP) proposed by the State legislature (A4021A Rosenthal / S568B Kavanagh), which would create a permanent, statewide Section 8-like subsidy program. The legislature should also be urged to help non-citizen New Yorkers by passing a bill expanding eligibility for CityFHEPS (A05513 Rosenthal / S1631 Kavanagh). These are two vital steps to expand equitable access to housing for domestic violence survivors, regardless of their immigration status.

Another major challenge for survivors is actually using the FHEPS and CityFHEPS vouchers once they are approved: Sanctuary clients still struggle to find suitable apartments within the voucher maximum, and many landlords refuse to accept the vouchers. There is a need for more training and reassurance for landlords about the FHEPS programs so that voucher-holders do not face continued discrimination in their apartment searches. Even when clients find apartments and landlords willing to take vouchers, the processing time can be so lengthy that landlords often cancel the application and rent to a tenant without a voucher.

We thank the Women & Gender Equity and General Welfare Committees for their joint oversight efforts, and are deeply grateful for your determination to tackle the challenging issues surrounding affordable housing in our city. Thank you for the opportunity to testify today, and for your unwavering commitment to abuse survivors and New Yorkers in need.



New York City Council Committees on General Welfare & Women and Gender Equity
Oversight Hearing on Supporting Domestic Violence Survivors in NYC's Shelter System

October 10, 2024

Submitted By:
Julia Kupiec, Chief Public Policy Officer
Bridget McBrien, Director of Government Relations

Hello Chairpersons and members of the New York City Council. Thank you for the opportunity to testify today.

The Jewish Board empowers New Yorkers, providing integrated mental health and social services with compassion and expertise. Broadly speaking, our programs serve low-income individuals and families from three populations: those with mental health challenges, those who have experienced abuse, and those with intellectual and developmental disabilities.

Our mission is to offer compassionate care and support to those who have experienced the trauma of domestic violence, and today, we must address a pressing challenge that threatens our ability to continue this essential work.

As you are aware, domestic violence is a pervasive issue that affects individuals from all walks of life. Our three Tier I shelters provide a safe haven for survivors and their children, offering not only immediate safety but also critical services such as counseling, legal support, and access to resources that facilitate their recovery and empowerment. However, the sustainability of these programs is in jeopardy due to significant financial pressures.

Over the past few years, The Jewish Board has faced considerable deficits in our programs, with annual losses exceeding \$1 million – \$1.07M in FY24 and \$1.14M in FY23. This alarming trend has strained our resources, making it increasingly difficult to provide the high level of care that our clients deserve. The reimbursement rates we currently receive do not adequately cover the costs of providing essential services, and this gap continues to widen. Even with Horizons in Brooklyn, which we occupy rent-free from New York City, we cannot make the financials work.

Without increased funding and support, we risk losing the capacity to offer these vital services. For a nonprofit organization like The Jewish Board, this is not just a financial challenge; it is a crisis that impacts the lives of survivors who rely on our shelters for safety and support. Every day, we witness the profound impact of our work, and it is heart-wrenching to think that we may not be able to continue serving those in need due to fiscal constraints.

We urge the City Council to consider working with the State to increase the rate reimbursement to providers like The Jewish Board. This investment is not just a budgetary decision; it is a commitment to the well-being and safety of our most vulnerable residents. By ensuring that domestic violence shelters are adequately funded, you are reinforcing the message that our city stands with survivors and values the crucial services we provide. We also support T2024-2573 A Local Law to amend the administrative code of the city of New York in relation to reporting on demand for domestic violence emergencies and Tier II shelters. We hope these data reports can be achieved without adding undue burden to the organizations already tasked with providing daily services. Likewise, we support T2024-2572, which would amend the administrative code to expand reporting on exits from domestic violence shelters. The Jewish Board has HUD-funded Rapid Rehousing programs to help families move on from shelter and think every survivor should have the opportunity to find safe and permanent housing.

Thank you for your attention to this urgent matter, and for your continued commitment to our community.



Testimony of
The Legal Aid Society

before the Committee on General Welfare, jointly with the New York City
Council Committee on Women and Gender Equity,

of the New York City Council

on

Oversight: Supporting Domestic Violence Survivors in NYC's Shelter System

Submitted by

Kathryn Kliff

Staff Attorney

The Legal Aid Society

October 9, 2024

The Legal Aid Society welcomes this opportunity to provide testimony to the New York City Council's Committee on General Welfare, jointly with the New York City Council Committee on Women and Gender Equity, in support of T2024-2572 and T2024-2573.

Domestic violence continues to be one of the most common reasons families and individuals experience homelessness.

Despite the frequency with which it is the cause of homelessness, there is no right to domestic violence ("DV") shelter, so far more people qualify for DV shelter than there are DV shelter placements. The DV shelter system has very few units for single adults, large families, and families with male-identified head of households. As a result, these groups are often forced to enter the DHS shelter system and lose the safety of being in a confidential location.

In addition, due to its limited supply, DV shelter is frequently inaccessible to our clients living with disabilities, as there are not units available when they need them to accommodate their disabilities. As a result, clients living with disabilities are often forced to go to DHS shelter and lose the additional services and confidential location in the DV shelters when the DV shelters cannot accommodate them.

Complicating matters, DV shelter is time-limited, so many clients are forced to enter DHS shelter when they are unable to find permanent housing by the time their stay expires in the DV system. In order to enter DHS shelter, clients are required to go back to PATH where they then must reapply to the DHS system. Previously, these families were allowed to go directly from the DV shelter to the DHS shelter placement, but that policy was eliminated. We call on the City to re-implement it to minimize the disruption to these vulnerable families.

While clients in DV shelter are eligible for City FHEPS vouchers, they have a difficult time finding housing within the time limits due to a lack of affordable housing in the city and source of income discrimination for those using vouchers.

We support T2024-2572 and T2024-2573 to increase accountability regarding the need for additional DV shelter beds and the need for additional affordable housing options for all homeless families and individuals, including survivors of domestic violence.

About Legal Aid:

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.

**Testimony of the Urban Resource Institute (URI) Before the New York City Council's
Committees on General Welfare and Women and Gender Equity on Housing Challenges
for Survivors of Domestic Violence**

URI is the largest provider of domestic violence shelter services in the United States, serving over 3,500 individuals impacted by domestic violence, intimate partner violence, and homelessness. We have been operating for nearly 40 years and remain committed to delivering innovative, trauma-informed, and client-centered services to survivors of gender-based violence.

We are honored to offer testimony on behalf of URI to discuss the urgent housing challenges faced by survivors of domestic violence in New York City. The recent report from New Destiny Housing highlights these barriers, and we will offer specific recommendations for City Council consideration. Additionally, we will outline some of the unique programs URI offers to combat these challenges, including our Economic Empowerment Program and services tailored to survivors with pets. In this testimony, we will cover the following key areas: recommendations from the New Destiny Housing report, the critical role of economic empowerment for survivors, challenges in the shelter system for those with pets, and URI's Crime Victims Services Program.

Housing Barriers for Survivors of Domestic Violence

The New Destiny Housing report brings attention to a dire crisis: survivors of domestic violence in New York City face significant obstacles in accessing safe and affordable housing. Factors such as immigration status, limited financial resources, and a shortage of tailored housing programs exacerbate these challenges. Without accessible housing, survivors' immediate safety is compromised, and their long-term stability is jeopardized.

First, we will present specific recommendations from the New Destiny Housing report, which URI fully supports. Following that, we will delve into URI's Economic Empowerment Program and its critical role in helping survivors rebuild their lives. We will also discuss the unique needs of survivors with pets, highlighting URI's groundbreaking People and Animals Living Safely (PALS) program. Lastly, we will review our Crime Victims Services Program and the pressing need for expanded housing specialists to support survivors' access to permanent housing.

Recommendations from the New Destiny Housing Report

1. Expand CityFHEPS Eligibility- URI strongly supports expanding City Family Homelessness and Eviction Prevention Supplement (FHEPS) eligibility to all survivors of domestic violence, regardless of immigration status. Many undocumented survivors fear seeking assistance due to potential immigration consequences. This expansion would ensure that all survivors, irrespective of their status, have the opportunity to access safe, stable housing, which is crucial to escaping abusive situations.

2. Create a Statewide Section 8-Like Voucher Program- A new statewide voucher program similar to Section 8 is critical. The demand for housing vouchers far outstrips supply, leaving many survivors without viable options. This program would provide flexibility in housing choice, allowing survivors to rebuild their lives in communities where they feel safe.

3. Expand Access to the SHARE Program- Survivors in Human Resources Administration (HRA) Tier II shelters should have access to the Special Housing Access to Rental Assistance (SHARE) program. SHARE provides critical rental subsidies that help survivors transition from temporary shelters to stable housing, reducing the risk of prolonged shelter stays and supporting faster recovery.

4. Fulfill the Commitment to Include Survivors in NYC 15/15 Supportive Housing- Including domestic violence survivors as an eligible population in the NYC 15/15 supportive housing initiative is essential. Survivors often require comprehensive services beyond housing, such as counseling and job training. Supportive housing would provide the wraparound services needed to facilitate long-term stability and independence.

5. Invest \$6 Million in ENDGBV's Microgrant Program- The microgrant program from the Mayor's Office to End Domestic and Gender-Based Violence (ENDGBV) provides essential financial assistance to survivors. These funds cover immediate needs such as childcare, transportation, and other expenses that are critical for survivors in their transition to independence. Increased funding would offer greater flexibility and support during this vulnerable time.

6. Address the Housing Needs of Single Survivors- Current housing policies often cater to families, leaving single survivors without appropriate options. Expanding resources to include single survivors would address this gap, ensuring they too have access to safe, supportive housing.

Economic Empowerment Program

URI's Economic Empowerment Programs supports families impacted by domestic violence and homelessness on their journeys to achieve economic independence and growth. The EEP aims to achieve this goal through work readiness programming, survivor career counseling, and job development support.

At the EEP, we understand the detrimental impact the public benefits cliff has on survivors' safety and security. A safety net that is aimed to support low-income New Yorkers, acts as handcuffs to financial stability and independence. We see this every day with the survivors we work with.

Expanding Resources for Survivors to find Permanent Housing

Survivors can only qualify for a FHEPS B housing voucher if their income is at or below 200% of the federal poverty level and receive cash assistance. City FHEPS is no better, survivors still have to be at 200% of the poverty line but do not qualify for FHEPS because they have limited

earned income. If a survivor earns even slightly above this threshold, they risk losing public benefits, including their voucher and housing. Both of these programs create a barrier to economic advancement. Additionally, City FHEPS is the only option for single survivors with income but they need to have an open public assistance case. However, the public benefits offices will rarely allow for an open case without cash assistance, putting singles in a catch-22.

We once worked with a client who held two jobs and was paying rent while living with the person causing them harm. Once she entered the shelter, her income exceeded the public benefits eligibility limit, but it was insufficient to afford a market-rate apartment. To qualify for public benefits, specifically cash assistance, she needed to quit one of her jobs to become eligible for a FHEPS B voucher, which would enable her the potential to secure permanent housing.

This is not rare, survivors often reduce their work hours or quit their jobs to access public benefits to obtain a housing voucher. Ironically, public benefits programs require them to seek employment. Survivors then face the inability to increase their hours, take a second job, build a career, or accept a promotion. If they do, they risk losing their public benefits, which would lead to the loss of their housing voucher and, ultimately, their home.

Unfortunately, only a small percentage of survivors manage to obtain an apartment using one of these vouchers. Many face the risk of not finding housing before they are discharged from the shelter, leaving them reliant on public benefits and without a home.

Many landlords and management companies are reluctant to accept vouchers, often driven by distrust of timely payments from HRA. We once assisted a client whose landlord hadn't received payment for 11 months. And in eviction cases, it is the tenant who is held liable, not HRA.

Despite the absurdity of this system, landlords frequently require credit reports from survivors with vouchers. Nearly all domestic violence survivors experience economic abuse, often leaving them in debt. According to the CDC, the average survivor carries \$104k of debt throughout their lifetime. Many survivors have faced issues like identity theft, fraud, and coercion, often perpetrated by the abusive party, and may not even be aware of these problems until they are denied housing. The physical and emotional toll is significant when a survivor finally finds a landlord willing to accept their voucher, only to be turned away due to a low credit score they were unaware of due to fraud. The average DV survivor has \$1,280 stolen from them each month by the person who continues to cause them harm. Survivors are consistently, and in various ways, paying for the abuse they have suffered.

Survivors deserve robust support from the city and the chance to thrive in their chosen careers. The city needs to invest in more affordable housing, it needs to incentivize landlords who accept vouchers and hold HRA accountable for late and non-payments. Public benefits need to be more accessible to more survivors, regardless of their immigration status. In the past year there have been random cut-offs of cash assistance and SNAP, leaving survivors food insecure and with no income. There needs to be a pathway off benefits or a bridge to economic self-sufficiency. We

need to invest in flexible financial assistance programs to support survivors in bridging income gaps.

Service providers require better resources to effectively support survivors in their journey to thrive. Limited staffing and insufficient resources hinder providers from delivering the necessary support that survivors deserve. Additionally, providers need the flexibility to allocate funds in ways that best meet survivors' needs.

We need to trust survivors. They are best positioned to know how to use their income effectively. New York City should consider investing in a Guaranteed Basic Income (GBI) program. Survivors deserve more than to just live above the federal poverty line; they should have the opportunity to pursue careers and interests that align with their aspirations. GBI would supplement earned income, giving survivors the freedom to make choices that benefit their well-being, rather than just making ends meet.

The city needs to provide further resources but also instate better systems to deliver these resources. Without this, survivors are left paying for the abuse they suffered.

The Impact of lack of Childcare

Financial empowerment for survivors of domestic violence is paramount to achieving safety for themselves and their families. More than ninety-eight percent of survivors of domestic violence also experience financial abuse, presenting a barrier to their journeys of economic empowerment and independence. The EEP focuses on equipping these survivors with support to re-enter the workforce and obtain employment that offers living wages.

However, one of the main obstacles that survivors experience is the lack of, and inaccessibility of childcare. The lack of childcare for survivors who are seeking employment often forces them to put their job opportunities—and subsequent economic freedom on hold. While social services such as HRA and ACS offer childcare vouchers, these vouchers are conditional on the fact that survivors can prove they are employed and can take up to 30 days to process. We work with survivors who after months of searching for employment finally get a job offer, only to have to turn their offer down because even if their childcare is approved, they will not have the opportunity to place their children with a reliable childcare provider by the time their job needs them to start working.

Other times, survivors have had to ask family members to take care of their children because they could not afford childcare when they start working, with no guarantee that their childcare voucher will even be approved after 30 days. In some cases, they are approved, and the survivor can continue working, only to lose their job later because the voucher expired or is terminated, reversing the efforts they've made to achieve financial stability and independence.

Achieving employment and financial stability is the way that survivors achieve safety. They should not have to worry that they will be unable accept a job because it takes too long for their childcare vouchers to be approved, and moreover maintain a job because their childcare vouchers may be taken away for arbitrary reasons. Childcare should be a means for survivors to achieve safety, not the barrier to safety.

The EEP's goal is to support survivors on their journeys to financial empowerment and safety, but we currently have a waitlist of over 100 people due to a lack of staffing positions available. The EEP is seeking funding to hire more staff to serve more survivors who need our services. Further contributions would also give us the ability to provide for survivors who need childcare while they start their careers or search for employment. For survivors of domestic violence, financial empowerment is safety, employment is key to financial stability, and survivors deserve safety above all else.

PALS Program

URI's People and Animals Living Safely (PALS) Program welcomes survivors of domestic violence into 10 of URI's 15 domestic violence shelters; serving more than 100 heads of households and close to 150 animals per year. In my six-and-a-half-years with URI, we have worked directly with survivors of gender-based violence facing housing insecurity with their pets and witnessed the immense difficulty they encounter in accessing safety and shelter, and ultimately in finding stability through permanent housing.

URI was the first shelter provider in NYC to welcome pets into our facilities and eleven years later are among a handful of organizations that provide this service. Multiple research projects – including a survey we conducted in partnership with the National DV Hotline in 2019 – have shown that 50% of survivors state they will not leave an abusive situation if they cannot bring their pets with them. Survivors and those facing all types of crises see their pets as family members. This reality is illustrated very clearly by events such as Hurricanes Helene and Milton, massive storms currently devastating the American south: people with no options to take their pets will stay behind, risking their own safety and lives. There are tragic stories every time one of these disasters strikes. We saw it with Superstorm Sandy here in NYC, and we see it every day while working with those surviving and fleeing gender-based violence. People will not access shelter, evacuate or seek safety if it means separating from their pets. Shelter needs to be accessible to survivors and their entire families – pets included.

Even though URI offers pet-inclusive shelter, the majority of HRA shelters and all DHS shelters (except for a very small pilot we are running at one Homeless Families site) do not welcome pets. This means that many survivors choose to obtain emotional support animal (ESA) documentation to access shelter and stay together with their pets through protection provided by the Fair Housing Act. Strong ESA documentation requires a relationship with a therapist, which takes both time and funds that many survivors cannot muster while in the middle of a violent situation. For those who

do have the necessary ESA documentation, they must fill out paperwork and then wait 10-14 days for a DHS determination as to whether their ESA will be allowed into shelter. This wait is more frequently closer to one month. This is not a reasonable amount of time to ask a person in crisis to make alternate care arrangements for a beloved family member. Ultimately, the ESA “workaround” is not the answer to this challenge. All shelters should be accommodating of pets to reduce barriers and increase access. URI has shown that these programs are possible and help survivors to heal and move towards stability in their lives.

New York City is also not doing enough to help single survivors of domestic violence with pets. This is by far the largest group we hear from among the nearly 500 people who contact us each year seeking shelter with their animals. In the DV shelter system, there simply are not enough spaces for singles, and these survivors are often forced into the DHS system. The majority of spaces available in both systems are shared units, meaning multiple people may share common space or even sleep in the same congregate area. For pet owners, this can be too complicated when, again, their lives are in a state of upheaval. If singles can access DV shelter, their time in that system is tightly monitored and the vast majority are not able to find permanent housing before being discharged. The expectation is that these clients will go to DHS’s single assessment centers, but this is not an option for those with pets or even ESAs. Most of the singles we assist through the PALS program end up returning to their abusers or other unsafe situations

The NYC shelter system creates significant barriers for people whose pets may be one of the few sources of peace and love during the toughest times. We ask the Council to consider ways to:

- Encourage all shelters to open their doors to family pets and make money available for organizations to create and operate these programs. URI is available to provide training and technical assistance, but we need additional funds to scale up those initiatives.
- Support HRA in efforts to make more space available for single survivors of DV by advocating for the implementation of the Securing Access to Fair & Equal (SAFE) Shelter Act - A. 2583A/S. 15A (Hevesi/Gounardes).
- Enhance voucher availability for single survivors of DV.
- Enforce DHS accommodation of ESAs, including timely reviews of submitted requests for accommodation.

URI cares deeply about supporting housing insecure people and those who have experience gender-based violence, often one in the same, with all their family members, pets included.

Crime Victims Services Program

URI's Crime Victims Services Program provides essential services to our clients such as emotional support, advocacy, court accompaniments, and informing clients on their legal rights as a DV survivor. CVSP is crucial in connecting clients to necessary URI services and bridging the gap between service providers and clients. Housing is always the number one need and most often the most difficult to acquire.

Housing Barriers for Domestic Violence Survivors

Housing remains the most critical need for domestic violence survivors, yet it is also the most difficult to secure due to several barriers. One of the major challenges is that many landlords discriminate against survivors who use vouchers like FHEPS B which is specifically designed to help survivors secure housing. Unfortunately, landlords frequently refuse to accept these vouchers, with some openly expressing their reluctance to rent to domestic violence survivors. As one landlord stated, "I do not want those kinds of problems here." This type of discrimination prevents survivors from finding the stable housing they need to rebuild their lives.

The urgency of this issue is reflected in the staggering statistics: in 2023, only 9% of survivor-led households (208 households) moved to a permanent home after their 180-day stay in an emergency shelter, while more than 10,842 survivors have resided in these shelters. This disparity shows the overwhelming need for more accessible and supportive housing options for survivors of domestic violence.

While some survivors qualify for a FHEPS B voucher, others—particularly those who are working but do not qualify for an HRA case—are left without any viable housing options while in emergency shelters. These clients are often forced to transition into family shelters just to qualify for other programs, such as the Special One-Time Assistance (SOTA) program, which helps pay for one year of rent. Expanding voucher programs like FHEPSB and SOTA would greatly benefit survivors in achieving permanent housing and allow them to focus on healing.

Restoring and Expanding Key Housing Programs

Another critical issue is the lack of consistent housing support programs. The Emergency Housing Voucher (EHV) program, which was offered to all domestic violence survivors in 2022, proved to be a lifeline for many of our clients. During its implementation, I was able to assist 14 survivors in securing their EHV vouchers and moving into permanent housing. However, the EHV program ended in 2023 and is no longer available to survivors, leaving many without this crucial resource. Reinstating programs like EHV would provide survivors with more opportunities to find safe and stable housing.

Moreover, URI supports the expansion of programs such as the Housing Access Voucher Program (HAVP), which is currently pending at the state level. HAVP would address many of the limitations survivors face by being accessible to all housing-insecure New Yorkers, regardless of

shelter, domestic violence status, or immigration status. Modeled after the successful Section 8 and EHV programs, HAVP could help thousands of New Yorkers, including domestic violence survivors, achieve permanent housing stability and safety.

The Need for Housing Specialists in Domestic Violence Shelters

In addition to addressing systemic housing challenges, there is an urgent need for more housing specialists in domestic violence shelters. Housing specialists play a vital role in helping survivors navigate the complex housing market and advocate for their rights as voucher holders. Currently, the lack of housing specialists is a significant barrier to survivors exiting shelters and securing permanent housing.

With dedicated housing specialists, we could offer survivors one-on-one support, including providing trainings on their legal rights, assistance with completing housing applications, and guidance in overcoming landlord discrimination. Expanding the number of housing specialists would greatly improve the chances of survivors finding permanent homes and moving toward long-term stability.

Survivors of domestic violence face significant barriers to achieving permanent housing, which is critical to their safety and recovery. Discrimination against housing vouchers, the end of effective programs like the EHV, and the lack of housing specialists all contribute to this crisis. Expanding programs like HAVP, reinstating housing support such as the EHV, and increasing the number of housing specialists in shelters would provide survivors with the tools they need to rebuild their lives.

Conclusion

In conclusion, the housing crisis for survivors of domestic violence in New York City is a multifaceted issue that demands urgent attention. The recommendations from the New Destiny Housing report, along with URI's programs such as Economic Empowerment and PALS, provide clear pathways to improving access to safe, affordable housing for survivors. We urge the City Council to prioritize these recommendations, invest in critical services, and ensure that every survivor can rebuild their life in safety and dignity. Thank you for your leadership and for considering these essential issues.

Good morning members of the City Council. I'd like to thank the committee on General Welfare, and the committee on Women and Gender equity for the opportunity to share my testimony. My name is Blair Doroshwalther, and I am the Director for the Economic Empowerment Program at the Urban Resource Institute (URI). The Economic Empowerment Program aims to provide economic justice through financial stability, meaningful employment, and financial healing. These are crucial tools to economic equity for survivors and their communities.

Every day we see the detrimental impact that the public benefits cliff has on survivors' safety and security. A safety net that is aimed to support low-income New Yorkers, acts as handcuffs to financial stability and independence.

For instance, to qualify for FHEPS B housing vouchers, survivors must earn at or below 200% of the federal poverty level. CityFHEPS has comparable limitations. If a survivor's income slightly exceeds the threshold, they risk losing essential public benefits, including housing vouchers. Additionally, CityFHEPS is the only option for single survivors with income, but they need to have an open public assistance case. However, the public benefits offices rarely allow for an open case without cash assistance, putting singles in catch 22.

I once worked with a client who juggled two jobs while paying rent when she lived with the abusive party. After entering a shelter, her income surpassed the eligibility limit for public benefits, yet it wasn't enough to afford a market-rate apartment. To qualify for cash assistance and secure a FHEPS B voucher for permanent housing, she had to quit one of her jobs.

This scenario is not uncommon. Ironically, these programs require employment, yet survivors can't increase their hours, take on additional jobs, advance their careers, or accept promotions without risking the loss of their benefits, which would ultimately lead to losing their housing voucher and home.

Many landlords are reluctant to accept vouchers, often driven by distrust of untimely payments from HRA. I once assisted a survivor whose landlord hadn't received payment for 11 months. And in eviction cases, it is the tenant who is held liable, not HRA.

Survivors are also burdened by economic abuse, with the average survivor carrying \$104,000 in debt throughout their lifetime. Many survivors face issues like identity theft, fraud, and coercion, perpetrated by the abusive party, and may not even realize it until they are denied housing. On average, domestic violence survivors lose \$1,280 monthly to their abuser. This takes a physical and emotional toll on survivors and their families.

Survivors deserve robust support from the city to help them thrive. This includes more affordable housing, incentives for landlords to accept vouchers, and accountability for HRA. Public benefits should be accessible to all survivors, regardless of immigration status, and there must be pathways to economic self-sufficiency. Flexible direct cash assistance programs are needed to help bridge income gaps. The city also needs to enhance delivery systems. Frequently, the available benefits are undermined by inefficient distribution.

Service providers also need better resources to effectively assist survivors, as limited staffing and funding hinder supportive efforts. Implementing a Guaranteed Basic Income program would provide survivors the opportunity to pursue careers and interests that align with their aspirations.

Without many of these changes, survivors are left paying for their abuse.

Good Morning. Thank you to the New York City Council, the committee on General Welfare, and the committee on Women and Gender Equity for the opportunity to present this testimony. My name is Eli Plvan-Franke. I am the Coordinator of Equity Initiatives at Urban Resource Institute's Economic Empowerment Program.

URI's Economic Empowerment Programs supports families impacted by domestic violence and homelessness on their journeys to achieve economic independence and growth. The EEP aims to achieve this goal through work readiness programming, survivor career counseling, and job development support.

Financial empowerment for survivors of domestic violence is paramount to achieving safety for themselves and their families. More than ninety-eight percent of survivors of domestic violence also experience financial abuse, presenting a barrier to their journeys of economic empowerment and independence. The EEP focuses on equipping these survivors with support to re-enter the workforce and obtain employment that offers living wages. However, one of the main obstacles that survivors experience is the lack of, and inaccessibility of childcare. The lack of childcare for survivors who are seeking employment often forces them to put their job opportunities—and subsequent economic freedom on hold. While social services such as HRA and ACS offer childcare vouchers, these vouchers are conditional on the fact that survivors can prove they are employed, and can take up to 30 days to process. I work with survivors who after months of searching for employment finally get a job offer, only to have to turn their offer down due to the fact that even if their childcare is approved, they won't have the opportunity to place their children with a reliable childcare provider by the time their job needs them to start working.

Other times, survivors have had to ask family members to take care of their children because they could not afford childcare when they start working, with no guarantee that their childcare voucher will even be approved after 30 days. In some cases, they are approved and the survivor can continue working, only to lose their job later because the voucher expired or is terminated, reversing the efforts they've made to achieve financial stability and independence.

Achieving employment and financial stability is the way that survivors achieve safety. They should not have to worry that they will be unable accept a job because it takes too long for their childcare vouchers to be approved, and moreover maintain a job due to the fact that their childcare vouchers may be taken away for arbitrary reasons. Childcare should be a means for survivors to achieve safety, not the barrier to safety.

The EEP's goal is to support survivors on their journeys to financial empowerment and safety, but we currently have a waitlist of over 100 people due to a lack of staffing positions available. The EEP is seeking funding to hire more staff to serve more survivors who are need of our services. Further

[Transforming the lives of domestic violence survivors and homeless families.](#)

contributions would also give us the ability to provide for survivors who need childcare while they start their careers or search for employment. For survivors of domestic violence, financial empowerment is safety, employment is key to financial stability, and survivors deserve safety above all else. Thank you.

Testimony Before the New York City Council on Housing Challenges for Survivors of Domestic Violence

Good morning Chair Ayala, Chair Louis, and esteemed members of the City Council. My name is Stephanie Paer, and I am the Program Manager for the Crime Victim Services Program (CVSP) at the Urban Resource Institute (URI). CVSP provides crucial services to domestic violence survivors, including emotional support, advocacy, court accompaniments, and education on their legal rights. Our goal is to help survivors navigate their journey to safety, healing, and stability, but one of the most persistent challenges they face is securing permanent housing.

In this testimony, I will first outline the housing barriers faced by survivors, including discriminatory practices against housing vouchers and the limited availability of housing programs. I will then discuss the need for more housing specialists in domestic violence shelters and emphasize the importance of expanding key housing programs like the Housing Access Voucher Program (HAVP) to better support survivors. Finally, I will explain how restoring effective programs, such as the Emergency Housing Voucher (EHV) program, could significantly benefit our clients.

Housing Barriers for Domestic Violence Survivors

Housing remains the most critical need for domestic violence survivors, yet it is also the most difficult to secure due to several barriers. One of the major challenges is that many landlords discriminate against survivors who use vouchers like FHEPSB (Family Homelessness and Eviction Prevention Supplement for Domestic Violence Survivors), which is specifically designed to help survivors secure housing. Unfortunately, landlords frequently refuse to accept these vouchers, with some openly expressing their reluctance to rent to domestic violence survivors. As one landlord stated, "I do not want those kinds of problems here." This type of discrimination prevents survivors from finding the stable housing they need to rebuild their lives.

The urgency of this issue is reflected in the staggering statistics: in 2023, only 9% of survivor-led households (208 households) moved to a permanent home after their 180-day stay in an emergency shelter, while more than 10,842 survivors have resided in these shelters. This disparity shows the overwhelming need for more accessible and supportive housing options for survivors of domestic violence.

While some survivors qualify for a FHEPSB voucher, others—particularly those who are working but do not qualify for an HRA (Human Resources Administration) case—are left without any viable housing options while in emergency shelters. These clients are often forced to transition into family shelters just to qualify for other programs, such as the Special One-Time Assistance (SOTA) program, which helps pay for one year of rent. Expanding voucher programs like FHEPSB and SOTA would greatly benefit survivors in achieving permanent housing and allow them to focus on healing.

Restoring and Expanding Key Housing Programs

Another critical issue is the lack of consistent housing support programs. The Emergency Housing Voucher (EHV) program, which was offered to all domestic violence survivors in 2022, proved to be a lifeline for many of our clients. During its implementation, I was able to assist 14 survivors in securing their EHV vouchers and moving into permanent housing. However, the EHV program ended in 2023 and is no longer available to survivors, leaving many without this crucial resource. Reinstating programs like EHV would provide survivors with more opportunities to find safe and stable housing.

Moreover, URI supports the expansion of programs such as the Housing Access Voucher Program (HAVP), which is currently pending at the state level. HAVP would address many of the limitations survivors face by being accessible to all housing-insecure New Yorkers, regardless of shelter, domestic violence status, or immigration status. Modeled after the successful Section 8 and EHV programs, HAVP could help thousands of New Yorkers, including domestic violence survivors, achieve permanent housing stability and safety.

The Need for Housing Specialists in Domestic Violence Shelters

In addition to addressing systemic housing challenges, there is an urgent need for more housing specialists in domestic violence shelters. Housing specialists play a vital role in helping survivors navigate the complex housing market and advocate for their rights as voucher holders. Currently, the lack of housing specialists is a significant barrier to survivors exiting shelters and securing permanent housing.

With dedicated housing specialists, we could offer survivors one-on-one support, including providing trainings on their legal rights, assistance with completing housing applications, and guidance in overcoming landlord discrimination. Expanding the number of housing specialists would greatly improve the chances of survivors finding permanent homes and moving toward long-term stability.

Conclusion

In conclusion, survivors of domestic violence face significant barriers to achieving permanent housing, which is critical to their safety and recovery. Discrimination against housing vouchers, the end of effective programs like the EHV, and the lack of housing specialists all contribute to this crisis. Expanding programs like HAVP, reinstating housing supports such as the EHV, and increasing the number of housing specialists in shelters would provide survivors with the tools they need to rebuild their lives.

URI remains committed to advocating for these essential changes, and we urge the City Council to prioritize the housing needs of domestic violence survivors. Thank you for your time and attention to these critical issues. I am happy to answer any questions you may have.

Testimony of the Urban Resource Institute before the New York City Council Committees on General Welfare and Women and Gender Equity on Housing Challenges for Survivors of Domestic Violence

Good morning Chair Ayala, Chair Louis, and esteemed members of the City Council. My name is Teal Inzunza, Associate Vice President of Justice Initiatives at the Urban Resource Institute (URI), the nation's largest provider of domestic violence shelter services. We serve over 2,200 people affected by domestic and intimate partner violence and homelessness. Thank you for the opportunity to discuss the critical issues survivors face in accessing safe and affordable housing.

The recent report from New Destiny Housing highlights the severe challenges survivors of domestic violence in New York City face, including immigration status, limited financial resources, and a shortage of appropriate housing programs. These barriers not only jeopardize their immediate safety but also hinder their long-term stability. URI fully supports several key recommendations from this report:

1. **Expand CityFHEPS Eligibility:** We strongly support expanding CityFHEPS eligibility to include all survivors, regardless of immigration status. This would allow more survivors to secure stable housing without fear of immigration consequences.
2. **Create a Statewide Section 8-like Voucher Program:** A statewide program would increase affordable housing options, helping survivors choose safe communities where they can rebuild their lives.
3. **Access to SHARE Program for Tier II Shelters:** Many survivors in HRA Tier II shelters lack access to rental subsidies. Expanding SHARE access would help them transition from emergency shelters to permanent housing more quickly.
4. **Include Survivors in NYC 15/15 Supportive Housing:** Survivors need more than just housing; they require supportive services such as counseling and job training. Including them in the NYC 15/15 initiative would provide critical wraparound support.
5. **Invest \$6 Million in ENDGBV's Microgrant Program:** This program offers flexible funding that empowers survivors to address immediate needs like transportation or childcare during their transition to safety. Increased investment would further support their independence.
6. **Reflect Housing Needs of Single Survivors:** Housing resources are often designed for families, leaving single survivors without adequate options. Including single survivors in housing assessments ensures equitable access to safe housing.

Each of these recommendations is essential to ensuring survivors can escape abusive situations and rebuild their lives. URI stands ready to support their implementation and continue advocating for policies that protect and uplift survivors. We will share more about these issues in our written testimony. Thank you for your leadership in addressing these urgent issues and I am happy to answer any questions you may have.

#

October 2018

My name is Barbara Mann, I am 56 years old with 2 disabled boys 26 year old and 18 year old.

I am a Ghanaian American, I emigrated to U.S.A in 1992. I am also college graduate (master's degree) myself and my 2 sons have become homeless since June 2018. Department of Homeless Service after denying us shelter June 2018, we lived in the streets of New York City for 6 months. And then moved to California to seek shelter. Our Section 8 voucher # 0458621 was illegally sold to someone back in December 2018.

Califorians also denied us Shelter.

We moved to Virginia to lived with
Strangers on the Streets. We could not
live in Virginia because my 26 year
old disabled son with severe mental
disease develop Type II diabetes
because while we were homeless and
moving constantly both ^{disabled} my son's
social security benefit ^{checks} were changed
to unknown psycers - And so I
had no means to get him the
proper healthy food.

We return back to the
city 2023 to seek shelter after
returning from Ghana in 2 years. But
DHS again refused to place us in
permanent housing after 9 months.

We have been shipped from shelter
after shelter with no help to get
housing for us. @

③

My 18 year old has not been to school since Age 13. His identity was used by unknown persons in NYC and receiving government benefit and also using identity for other things.
D. His has moved us to 5

Shelters for the past almost 2 years. (


Now even if we get housing we have no means of paying our share of rent. My 2 disabled sons

Social Security benefits checks have collected or stolen by a third

party claiming through HRA and Social Security Administration

Please I need your assistance
Thank - you

Barbara ^{Murray}



MARION KENDALL TESTIMONY:

Good morning, distinguished members of the New York City Council.

My name is Marion Kendall, and I am a co-chair of the New York State Anti-Trafficking Coalition and the co-founder of Thrive, an organization dedicated to providing critical support and services to victims and survivors of sexual exploitation across all the districts represented here today. I am here to voice our unwavering support for the Safe Hotels Act, a bill that represents a beacon of hope in the fight against human trafficking, particularly within the hospitality industry. This bill is a vital step towards protecting the vulnerable and ensuring that no individual is exploited in the very places where they should be safe.

Human trafficking, specifically sex trafficking, is an insidious crime that hides in plain sight, and hotels are often complicit, whether through neglect or lack of awareness. For traffickers, hotels provide anonymity and convenience. For victims, hotels become prisons – places where their humanity is stripped away. Today, I want to share with you the lived experiences of survivors that I personally know that underscore the necessity of this legislation.

Maria's Story: Maria, a 19-year-old immigrant from Central America, came to the U.S. with the promise of a legitimate job in hospitality. What she didn't know was that her traffickers had other plans. Instead of the opportunity she was promised, Maria was locked in a hotel room and forced into prostitution. Every day, she endured unspeakable physical and sexual violence, unable to escape because her traffickers threatened her family back home. She lived in terror, isolated and powerless, trapped in a place where hotel staff never questioned her constant presence.

Sarah's Story: Sarah is a 26-year-old single mother who was coerced into the sex trade by a trafficker who preyed on her financial desperation. Manipulated into believing she had no other option, Sarah was taken to high-end hotels, where she was forced to meet clients and perform sexual acts against her will. The emotional abuse she experienced shattered her self-esteem and her trust in others. The psychological scars Sarah carries make it difficult for her to heal or even believe she deserves a life free from violence.

Jessica's Story: At 16, Jessica ran away from home, trying to escape a cycle of domestic abuse. Vulnerable and alone, she fell into the hands of a pimp who moved her from hotel to hotel, selling her to men around the clock. Despite her youth and cries for help, no hotel staff intervened. Jessica's young age made her an easy target, and the constant violence and exploitation pushed her deeper into despair. On the rare occasions she tried to flee, her trafficker hunted her down and dragged her back into the very same hotel rooms.

Rachel's Story: Rachel, now 35, spent years trapped in a brutal cycle of exploitation that took her through countless hotels and motels across the country. Sold into the sex

trade as a teenager, Rachel's life became an unending nightmare of abuse. Her days revolved around checking in and out of hotels to meet the demands of dozens of men—sometimes up to 60 clients a day. Despite the obvious signs of trauma, drug use, and violence, no one in these hotels reached out to help her. At 35, Rachel still struggles with basic life skills, such as cooking or taking care of her health. Her traffickers controlled every aspect of her life, leaving her with untreated physical and psychological scars that continue to haunt her today.

These are not isolated incidents. These stories are emblematic of a much larger, systemic problem in the hospitality industry, where a lack of oversight and accountability allows human trafficking to flourish. The exploitation and trauma experienced by these survivors are happening in hotels across the city, with little intervention.

The **Safe Hotels Act—Int. No. 991-A**—directly addresses the pervasive issue of human trafficking within the hospitality industry by implementing critical protections that the industry itself has failed to enforce adequately. While some in the hotel industry argue that they are doing enough to combat trafficking, the reality is that traffickers continue to exploit hotel spaces due to insufficient oversight and inconsistent training. The bill mandates comprehensive human trafficking recognition training for all core hotel employees, empowering staff to recognize and report signs of trafficking. This measure is vital because, too often, victims are overlooked due to a lack of awareness. The argument that hotels are already doing enough falls flat when over 3,000 people are currently trapped in trafficking situations in New York City hotels. The panic buttons required for hotel workers, along with the elimination of short-duration bookings, directly address key vulnerabilities that traffickers exploit, helping to create a safer environment without placing undue burden on hotels.

Additionally, claims that the Safe Hotels Act would harm the hotel industry are simply unfounded. The introduction of operating license requirements—something that already exists in other major tourist cities—would ensure that hotels meet consistent safety and operational standards without stifling business. In fact, these licensing standards will elevate the industry by ensuring accountability and protecting both workers and guests, making New York City a leader in safety and tourism. Far from “killing” the industry, this legislation offers long-overdue regulations that level the playing field and enhance the city's reputation. Furthermore, by requiring direct employment of core hotel staff, the Act strengthens compliance with anti-trafficking protocols, preventing hotels from outsourcing responsibility. The enforcement provisions, including escalating penalties and potential license revocation for non-compliant hotels, ensure accountability without harming legitimate businesses. This bill is not just necessary for public safety—it is a moral imperative that will foster a healthier, safer hospitality industry in New York City.

Recent high-profile cases, like the allegations against Sean "Diddy" Combs, illustrate the pressing need for this legislation. Combs has been accused of engaging in sex trafficking, with some activities allegedly taking place in New York City hotels. His case shines a light on how even the highest levels of the hospitality industry can serve as silent enablers of sex trafficking. From budget motels to luxury establishments, hotels have too often become the backdrop for exploitation. The pattern of abuse in cases like

Combs' is a reflection of the deeper flaws in hotel policies and procedures, where a blind eye is turned to obvious signs of sexual exploitation. Passing the Safe Hotels Act would send a strong message that New York City will no longer allow these crimes to continue unchecked.

We must reject the dangerous notion that any form of exploitation is acceptable, or that trafficking offers a path to economic survival. It does not. It is exploitation, pure and simple, and it thrives in silence. For the sake of survivors like Maria, Sarah, Jessica, and Rachel—and in the wake of recent allegations that highlight the depths of this problem—I urge you to pass this bill. By enacting Int. No. 991-A, you will take a decisive stand against human trafficking and help create a safer, more just New York City.

Thank you for your attention to this urgent matter.

Good Afternoon City Council : I am writing today to attest to my lived experience at a domestic violence shelter. I feel compelled to share the most vital points being that this happened December 2023-January 2024. My name is Patricia Jacobo, I am a proud Dominican American born and raised in this powerful beautiful city. I am also a mother, and a survivor of domestic violence. I entered the domestic violence family shelter system in December 2023 with my toddler son. Domestic violence does not discriminate against anyone, domestic violence *is* a health care issue.

The staff working in the shelter system I stood in lacked trauma informed care and did not care for the well being of the victims/survivors. My case worker, associate director and director would disclose information on my employment and my case in front of other survivors and staff. My caseworker made me aware that I *"was just as important as a migrant"*. My son was discharged from the shelter with no recourse, due to unexcused absence, this caused me an obscene amount of stress. They would put threatening letters under my door to communicate with me, completely unaddressed which I still have. I was given my residency letter after my son was discharged, and after I had been there for only a month. The staff would speak to me with my room door open. The entire time I was at my shelter, my case worker would constantly re-direct me to HRA to obtain any service or assistance as a survivor. This included, transportation, housing assistance, snap food stamp assistance, therapy and health care services. My caseworker, the director and associate director, led me to nearly lose my mind navigating this whole process seeking stable shelter for me and my son, alone. I had to keep going to the Manhattan Family Justice Center. The staff at my shelter did not care that I was a mother, an employee or a survivor. They simply cared about HRA paying for my bed and attendance, as confirmed to me by my caseworker.

They were very prideful on *"The system not having any changes for the last 30 years."* There was never an effort to support or help me stay . I felt so unsupported and disrespected because I was a hospital employee and my case worker told me *"no shelter in New York City would accommodate a hospital workers schedule"*. Even after providing written documentation from my manager from work, I was not accommodated, I was marked absent and threatened to be discharged. I was tossed around like a hot potato between the family court in Manhattan and my shelter . My shelter then refused to communicate with the Manhattan family justice center to help me and my son while I was seeking help in their office. I was missing work, missing stability, missing guidance, missing **support and respect**.

The conditions of the shelter I lived in were deplorable. I am traumatized by not only the way my son and I were treated but also by the amount of cockroaches I had to protect myself and my son from. One day I was on the M15 bus and a roach crawled out of my purse, I ran off the bus crying from embarrassment because I knew where it came from, and that I had to go back.

The bathrooms were also filthy. The doors were unlocked , bathroom sinks covered with food, bathroom wreaked of mildew and mold. The camera and security system seemed to have an issue every other night. The food was scarce, I met a mother in the staircase, she was highly triggered by the way the staff was speaking to her daughter, she wanted to retaliate physically. I felt so bad for all of us. We were all literally being re traumatized . Hellgate station is a real place.

One December evening, my son fell going up the stairs to our room, he hit the side of his face with a stair. The staff was adamant that an ambulance be called to make sure there was no liability for them. My son is under his fathers insurance. My sons father is my abuser. Now, I was worried he would find out about my living situation. I was alone in the emergency room and after learning everything was ok, we

were discharged in the middle of the night. I had to walk back to my shelter in the middle of the night with my son. My son was then wrongfully discharged due to the shelter's absence policy they made it clear he could not come back. I was so confused and depressed and had to figure out a way to survive without my son being next to me. I would leave my son in my mother's home in Lower Manhattan and take the M15 bus and train back to my shelter, to then leave before the sun could rise, to be together again with my son.

I was so mentally exhausted from the amount of closed doors I kept coming across, I ended up in the mental health emergency room in shortly after the new year broke in due to my mental health declining. My case worker was completely unaware and showed no compassion upon me informing her when I returned. She did not make a copy of my discharge papers or even glance at them, I was simply told, *"That's your business, you gotta do what you gotta do, ma-ma."* My own therapist and psychiatrist could not get in touch with my caseworker after this incident. My mental health had gotten worse and I could no longer stay in the pit of doom. I had to take a leave of absence unpaid because staying in that shelter meant I would get worse, I could not allow that. I would never recommend a survivor to stay in a shelter. I am now doubled up with my son in my mother's home awaiting the voucher process which I've navigated on my own with the support of other survivors. Survivors who work, or don't, should *never have* to compromise their well being seeking better shelter, safety, community to heal. I hope you hear my plea, audit and change your system.

New York City Council [Committee on General Welfare](#)

New York City Council Committee on [Women and Gender Equity](#)

October 9th, 2024 at 10:00 am - Chambers of City Hall, New York, NY and via Zoom web-conference on: [Oversight T2024-2558 – “Supporting Domestic Violence Survivors in NYC’s Shelter System”](#)

Re:

- **T20242572** - A Local Law to amend the administrative code of the city of New York, in relation to expanding reporting on domestic violence shelter exits;
- **T2024273** - A Local Law to amend the administrative code of the city of New York, in relation to reporting on demand for domestic violence emergency and Tier II shelters

Dear City Council & Deputy Speaker, [Diana I. Ayala](#);

Chair Members: [Alexa Avilés](#), [Chris Banks](#), [Tiffany Cabán](#), [Chi A. Ossé](#), [Lincoln Restler](#), [Kevin C. Riley](#), [Althea V. Stevens](#), and [Sandra Ung](#)

Title: “DV Shelter Exit Planning from the Lens of an Unaccompanied (Single-person Household) Survivor and Subject Matter Expert”

Hello, my name is Sharlena Powell, and I identify as a person with lived experience and subject matter expert on the intersection of Domestic Violence and Homelessness. I also have been an advocate for social justice, and equitable systems practices throughout this great city and in our nation.

Why do I write this testimony:

The Council writes and passes local laws that affect the day-to-day lives of people living in, working in, or visiting New York City. Amplifying voices of survivors of domestic and gender-based violence, people like myself, has been a core driver in my professional career design and throughout my household lifetime (among the nuclear and extended family composition). Often limited and in need of greater investment, many who consider as a vulnerable population: including in communities of unaccompanied women, unsheltered homelessness, culturally diverse populations, and those with language and accessibility needs; should have their recommendations on housing access, safety, and stability heard – and of influence within decision-making entities and councils.

In my personal testimony of applying for Tier 2 shelter, like many survivors of abuse, I was accustomed to “having all my eggs in one basket” in seeking housing opportunities, and was optimistic that this could be an option for longer term housing. Within 2 weeks of being scheduled to leave the emergency DV shelter, I was told by my case manager that there was not enough space and was not selected for Tier II housing. I remember being very uncomfortable exiting after 180 days to a single general population shelter, with only a part-time job and unable to afford housing at the time. Upon entering DHS shelter, I was encountered by my then abuser’s cousin, and experienced community violence as retaliation from reporting her cousin to the police month’s prior, for his abuse and damage of property. I then self-advocated to seek temporary housing with a religious nunnery in another borough.

My story is one of success and resilience though, since I actively work in helping to redesign coordinated entry systems with meaningful inclusion of survivors, and in enhancing supportive and preventative services that meet unique needs of survivors impacted by DV and Homelessness.

Below are a few Recommendations and Next Steps in addition to the proposed amendments:

- Developing a “Move Onward/Forward” Policy - which may confidentially monitor how survivors flow throughout the system, and establishing Data-driven Action steps to decrease exits to

New York City Council [Committee on General Welfare](#)

New York City Council Committee on [Women and Gender Equity](#)

October 9th, 2024 at 10:00 am - Chambers of City Hall, New York, NY and via Zoom web-conference on: [Oversight T2024-2558 – “Supporting Domestic Violence Survivors in NYC’s Shelter System”](#)

unstable and fairly unpredictable housing. This will also support Point in time counts in our CoC systems.

- Incorporating the measured results from these proposed amendments to have an influence on programmatic and non-traditional systems care, including how economic literacy and food insecurity referrals are implemented, infusion of the way harm reduction and problem-solving strategies are given, and holistically supports aspects of self-care/grieving coping mechanisms can help in building community revitalization and whole-person approach.
- This data should be gathered also in a trauma-Informed manner, that uplifts survivor resilience and incorporates community awareness and empowerment activities to share successes in these data findings. This data will also support the emotional toll of how survivors navigate systems for housing stability.
- Promoting diversity and equity in the distribution of already scarce housing opportunities, as gathering this quantitative and aggregate-level data on shelter exits ultimately supports the economic wellness of survivors seeking safe and affordable housing.

Thank You to the Council, for your profound approaches in serving and protecting survivors, including with the previous “Support Survivors” legislative package. Thank You to Deputy Speaker Diana Ayala, NYC Human Resources Administration, especially the DVS unit, NYC Department of Social Services, The Mayor’s Office to END Gender-Based Violence for supporting survivors of GBV throughout the year and being a beacon of HOPE with NYC Hope, to the DV Economic Justice Coalition - Housing Stability Workgroup, to New Destiny for the beautiful invitation to join in on this dialogue, and to Voices of Women as a pertinent part of how I engage in NYC systems of care and response.

STATEMENT OF STEVEN DE CASTRO
TO THE COMMITTEE ON GENERAL WELFARE
October 9, 2024

Subject: Challenges facing Guardians ad Litem who serve vulnerable tenants in Housing Court; Ability for GAL's to Assist in Reporting domestic violence, child abuse and elder abuse.

Witness: Steven De Castro, Esq.
Guardian ad Litem of the NYC Housing Court
[REDACTED]
Woodside, New York 11377
tenantlawyer@gmail.com
[REDACTED]

(MY ORGANIZATION, THE GUARDIAN AD LITEM ASSOCIATION OF NEW YORK, WISHES TO PROPOSE LEGISLATION TO THE GENERAL WELFARE COMMITTEE.)

“More housing cases are filed in New York State each year than all the civil and criminal cases filed annually in all the federal district courts of the 50 states combined. (The housing court) has a profound impact on people's lives and livelihoods.” Andrew Scherer, RESIDENTIAL LANDLORD-TENANT LAW IN NEW YORK, Preface, p. V.

One large problem affecting our city is that there are many vulnerable New Yorkers living alone in apartments, suffering from the afflictions of advanced age or mental illness, who are being sued in housing court, and they do not have the capacity to defend themselves. This problem came to a head in 1984, when the NYPD officers were called to evict elderly NYCHA tenant Eleanor Bumpers and ended up killing her in a hail of gunfire. Since the famous Eleanor Bumpers shooting, the housing court judges will not allow the eviction of a mentally ill or infirm tenant unless a guardian ad litem is appointed.

That is where I come in. Housing court judges regularly appoint me to serve as a guardian ad litem for elderly and mentally ill tenants for almost thirty years. I serve on the Steering Committee of the Guardian ad Litem Association of New York, which is the voice of GAL's in the City of New York.

GAL's can play a significant role for their wards, even outside the courthouse. Since GAL's

often do home visits, they are in a good position to detect and report domestic violence, elder abuse, and child abuse. GAL's can be trained in the mandatory reporting program, which trains first responders to spot domestic abuse and report it. Also, the NYPD can be directed to accept the welfare checks, domestic abuse, and missing persons referrals from GAL's.

As an example, a few days ago, I went to a routine home visit of my 80-year old ward with dementia, Frederick Williams, who lives at [REDACTED], in Jamaica. Now, I am not sure if Mr. Williams has been killed by his abuser, or whether he has been placed in a position where his health and wellbeing is at risk. I entered the home to find that his apartment of ten years is totally vacated, and entirely cleaned out of anything of value, not even a toothpick remaining. The management office tells me that a woman, falsely claiming to be his daughter, had been living with him and exploiting him. Now, Mr. Williams and the woman are completely gone. After a discussion with NYPD that lasted many hours, they refused to take my missing persons report. That is an example where a city council legislation which clarifies the powers of a GAL outside of the courthouse can be very helpful when a vulnerable New Yorker is in jeopardy.

I am an attorney, but most GAL's are not attorneys. Since the fees are relatively low, the housing court over the years has grown to rely on many non-attorneys to serve as GAL's. Most GAL's, if not the majority, are African American, particularly African American women.

Along with this demographic shift, GAL's have faded into the background and their crucial role in this City has not been recognized. As such, the GAL Program is suffering from serious problems which could tear it apart. Today, I will bring to you just two of these problems.

Problem #1

The first problem is that Adult Protective Services, which is responsible for paying GAL's their fees, is inconsistent in paying the bills that they receive from GAL's. They give no timeline for processing invoices, and if they find a problem with an invoice, their policy is to keep that problem to

themselves, until a GAL realizes that many weeks have passed without payment and makes an inquiry. Once a GAL demands payment on the outstanding invoice, APS often refuses payment based on an immaterial infraction, such as submitting a form a few days late.

This problem must be addressed by the City Council. If APS is to refuse payment, it should be required to object to an invoice within a set time period – for example, 10 days. They must have a consistent and professional procedure for paying their bills on a reliable timeline. And they should be allowed to refuse payment only on the grounds that the GAL has materially breached their obligations under their appointment. (The material breach standard applies to all City vendors and is a staple concept of contract law for centuries.) In short, the City Council must provide time limits for objecting to GAL invoices, there must be accountability for delays, and they must root out the irresponsible lack of commitment to timely paying these bills.

Problem #2

GAL's are also appointed to protect the interests of vulnerable tenants facing termination hearings for the 177,000 apartments of the NYCHA public housing system. The problem is that NYCHA's GAL program began by paying the same fee as the housing court program. But currently, NYCHA has missed at least two increases. So, over the course of 5 to 10 years, while the housing court program increased their GAL fee from \$600 to \$750 to \$1050, the NYCHA GAL program missed those increase still pays \$600.

In order to insure the long term stability and growth of the program's ability to protect the interests of NYCHA tenants, the City Council must direct NYCHA to increase the GAL fee to \$1050.00, in parity with the housing court GAL program.

**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: John Rojas, Chief Special Services

Address: offices

I represent: DSS (HRA)

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: Rima Rivera, Deputy Commissioner

Address: - DV Services

I represent: DSS - HRA

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: Jennifer De Carli Deputy Commissioner

Address: for FJC operators and Survivors Ser

I represent: END GBV-

Address: _____

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

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 10/09/2024

(PLEASE PRINT)

Name: Laura Horvath-Roa

Address: _____

I represent: NYC Anti-Violence Project

Address: 116 Nassau Street, NY NY 10038

**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: Chris Mann

Address: _____

I represent: Win

Address: 1 State St. Plaza

**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: Stephanie Woodbine

Address: [Redacted] 149th Avenue

I represent: New Destiny SUP

Address: _____

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

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 10/9/24

(PLEASE PRINT)

Name: Elijah Pivan-Franke

Address: _____

I represent: URI

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: 10/9/24

(PLEASE PRINT)

Name: Stephanie Paer

Address: _____

I represent: URI

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: 10/9/24

(PLEASE PRINT)

Name: Blair Doroshwalther

Address: _____

I represent: URI

Address: _____

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

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 10/9/24

(PLEASE PRINT)

Name: Teal Inzunza

Address: _____

I represent: URI

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: October 9th, 2021

(PLEASE PRINT)

Name: Rachel Wang

Address: _____

I represent: Hispanic American Family Service Center

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: Teal Inzunza

Address: _____

I represent: Urban Resource Institute

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: 10-9-2024

(PLEASE PRINT)

Name: Judith Goldner

Address: 49 Thomas St 3rd floor NY NY

I represent: The Legal Aid Society

Address: same

**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: GABRIELA SANDOVAL PEQUENA

Address: _____

I represent: NEW JUSTICE HOUSING

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: Shaniqua Anne Holiday

Address: _____

I represent: Safe Horizon

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: Kameeza Nizam-Chattoo

Address: _____ 04/11/83

I represent: Sanctuary for Families

Address: Po Box 1406 Wall St. Station

**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: 10/9/24

(PLEASE PRINT)

Name: Kristel Hurrell

Address: _____ #10 LIC 14, 1101

I represent: Survivors Sisters In Purple

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 Trapeani

Address: _____

I represent: Volunteers of America - GNY

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: Karena Lim-Peralta

Address: 190 E. 162nd St. Bronx, NY 10451

I represent: CENTER FOR FAMILY REPRESENTATION,

Address: 190 E. 162nd St. BRONX, NY 10451 INC.

**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: Aqueelah Winston Deputy Commissioner

Address: Shelter Talk and Assesment

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: Oct. 09, 2024

(PLEASE PRINT)

Name: Stephanie Mansfield

Address: [Redacted] NY NY 10002

I represent: myself as a survivor of DV + Sexual Assault

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: 10/9/24

(PLEASE PRINT)

Name: Dominic Esposito

Address: [Redacted] Brooklyn, NY

I represent: Survivor

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: Tom Diaz

Address: [Redacted] NY 10098

I represent: Citizens Committee for children

Address: 101 Wall Street

**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: 10/9/24

(PLEASE PRINT)

Name: KAMEGZA NIZAM-CHAITOO

Address: _____

I represent: SANCTUARY FOR FAMILIES

Address: PO BOX 1406, WALL STREET STA, NY NY 10268

**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: _____

Address: _____

I represent: _____

Address: _____

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

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: BARBARA MARY 10/9/24

Address: _____

I represent: Admeters

Address: _____

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