

#### <u>Testimony of Reesa Henderson, Chief Housing Officer</u> New York City Department of Social Services

#### Before the New York City Council, Committee on General Welfare Oversight Hearing on The CityFHEPS Program

#### **December 3, 2025**

Good morning, Deputy Speaker Ayala and members of the Committee on General Welfare, my name is Reesa Henderson and I serve as the Chief Housing Officer at the Human Resources Administration (HRA). Joining me today are Christopher Gonzalez, Chief Strategy Officer at the Department of Social Services (DSS), and Andrea Reid, Executive Deputy Commissioner of Housing Services Administration at HRA. Thank you for holding today's hearing on the CityFHEPS program.

CityFHEPS is the City Fighting Homelessness and Eviction Prevention Supplement. Today, CityFHEPS is the second largest rental subsidy program in the nation; more than 60,000 households, made up of more than 136,000 New Yorkers, are using CityFHEPS to support their housing needs. Eligibility for CityFHEPS depends on a variety of criteria including household income, housing situation, and history of homelessness.

CityFHEPS is one component of a larger strategy to provide an integrated continuum of client services and a path to sustainability for low-income New Yorkers. We continue to see that path as rooted in three pillars: streamlining access to social services; addressing homelessness and housing instability; and creating economic stability.

Though our focus today is on CityFHEPS, I do want to highlight our vision placing CityFHEPS in a broader context in assisting the more than three million New Yorkers we serve. In addition to CityFHEPS, the New York State Family Homelessness and Eviction Prevention Supplement (State FHEPS), the Housing Choice Voucher Program, also known as Section 8, and Department of Housing Preservation and Development (HPD) and New York City Housing Authority (NYCHA) housing, all serve as important tools in providing crucial aid and support to New Yorkers. In the broader policy context, it is also important to recognize that other levels of government share the responsibility to devote resources to support housing stability broadly, and through rental assistance in particular. As Commissioner Park has related to the Council, we underscore the need for further investment by our New York State and federal government partners; their shared investment in housing subsidies is essential to ensuring New Yorkers at risk of housing instability receive as many resources as possible.

DSS has done significant work to strengthen CityFHEPS, but it is important to note that this work is happening in a context that presents numerous ongoing challenges. The New York City vacancy rate of 1.4% is the lowest since 1968; furthermore, the vacancy rate is lower than 1.4% for

affordable rental units. For households searching for units under \$1,100, the vacancy rate was 0.39%. Those vacancy rates make it extremely difficult to secure affordable housing, even with a voucher. We recognize the urgent need to sustain efforts on the housing supply side of the challenge; even as a record number of New Yorkers are using CityFHEPS to pay their rent, there are more than 10,000 households with CityFHEPS vouchers in shelter looking for housing. In the face of these challenges the City and DSS continue to innovate and partner with sister agencies in mobilizing resources to assist our clients.

Despite the challenges, our City's investment in rental assistance has proven successful. FY24 saw over 12,000 households permanently housed through CityFHEPS, FY25 saw 15,000 households permanently housed through CityFHEPS. Counting by households served since FY20, CityFHEPS has seen more than 200% growth in the program. During the Adams administration, the program has grown even more rapidly with a 120% increase in the number of households using the voucher, and a nearly five-fold increase in funding for the program (FY21 at \$253 million to FY25 at \$1.1 billion). In FY25, CityFHEPS continued to be the primary driver for shelter moveouts, accounting for two-thirds of subsidized exits. In sum, CityFHEPS continues to be the most valuable, beneficial, and significant resource supporting shelter move outs. CityFHEPS outcomes serve as a testament to the steps forward DSS has taken in expanding access to CityFHEPS and expediting the processing of vouchers by streamlining systems, strengthening oversight, and implementing a technological overhaul to enhance efficiencies. The average days from submission to approval has come down from a high of 33 during 2024 to a recent low of around 23 days; that represents a decline of 33%.

This progress has been the result of deliberate, intentional work. For example, we established a Concierge Unit as a pilot program in the last year. The Concierge Unit focuses on working with shelters to assist in meeting moveout goals. The team engages with providers, both onsite and offsite, to share resources and best practices in the rehousing process. Sending support staff to shelters and providing "concierge" support has yielded promising results thus far, with the first two cohorts of participating shelters showing increases in subsidized exits (in the first two cohorts we saw an improvement in total placements for a majority of shelters that participated in the program). We aim to strengthen the unit in future.

With regard to the clearance process, which looks at administrative records (e.g. deeds, violations) in advance of package processing, we have taken steps to make that component of the larger process move more quickly. For instance, instead of simply failing offers that have incorrect owner information, DHS can provide the correct information to the submitter and offer guidance. Through taking various measures to further automate the clearance process and linking the process to tools like HPD Online, we have made progress in expediting this step in the larger workflow.

Another area we further refined, with an eye towards expediting the process, is processing Cash Assistance applicants for CityFHEPS. Previously, a household receiving Cash Assistance would have their CityFHEPS application sent for budgeting, that is processing and reexamination of household income information (e.g. pay stubs), potentially serving as a site of delay. Now, we are able to use the New York State Welfare Management System (WMS) and need not re-budget Cash Assistance cases. Cumulatively, taking steps like bolstering providers' capacity to engage the

system with a Concierge Unit, streamlining the clearance process, and taking advantage of WMS where practicable, results in fewer obstacles delaying the overall processing timeline.

Homebase serves as a key pathway for access to CityFHEPS in the community. HRA oversees 26 Homebase sites across the five boroughs. The Homebase program provides various homelessness prevention services as well as aftercare support services to families and individuals exiting shelter and moving to permanent housing. New Yorkers may be eligible for Homebase if they are at imminent risk of entering the New York City shelter system, are low-income, and want to remain stably housed in their community. Once in the program, dedicated Homebase staff are available in each borough to evaluate a household's specific needs and offer supports, such as: services to prevent eviction; assistance obtaining public benefits; emergency rental assistance; utilities and rent payment support to address arrears; short term financial assistance; educational job placement assistance; and help relocating.

Part of CityFHEPS' success stems from DSS-HRA-DHS provision of assistance to clients in their search to find permanent housing from day one. Beginning at the point of shelter entry, through the issuance of the Shopping Letter, and to the point of move-out from shelter our dedicated DHS and provider staff support clients in their housing search process. That process includes case management, connecting clients with the tools to obtain employment, the work of shelter housing specialists engaged in finding apartment leads, and the work of the HRA apartment search team and Public Engagement Unit making apartments available to all shelter providers. We are focused on working together to make sure subsidy applications are accurate and processed efficiently.

In addition to the work of our staff, I would also like to recognize the enterprising work of providers, advocates, and other stakeholder partners in the process; further, I would like to recognize the strong determination of our clients in being absolutely central to taking that next step in their path to housing stability.

At DSS, we understand the need to make the system of social services as navigable for clients, and those assisting our clients, as possible. We work to connect every New Yorker with the benefits and social services for which they are eligible. We also have to recognize that the needs and eligibility of households vary; for instance, eligibility for assistance for a given program for a veteran may differ from that of someone needing supportive housing. There will be documentation requirements involved because we are working to link people with the resources that serve their individual circumstances best, and because we are working with State and federal partners with their own requirements.

We continue to work to reduce administrative burden borne by clients as much as we can by designing innovative systems like Access HRA and CurRentNYC. We are also in the process of creating sensible workflows and automated linkages that assist our clients, our community partners, and our staff through the process. We recognize that doing so eases the burden and reduces the stress that our clients face as they endeavor to secure an affordable apartment in a housing market where there is short supply.

I also want to take this opportunity to recognize the Council's June 2025 report which focuses on process improvements and streamlining access. We remain committed to working closely with the Council and hearing your ideas on creating efficiencies and improving our service delivery.

When assessing changes, we keep in mind that regulatory, operational, timeline, and cost considerations all need to be taken into account – that includes taking into consideration where our New York State oversight body, the Office of Temporary and Disability Assistance (OTDA), has offered direction or where federal authorities have issued mandates, where a given change may require significant technology investment, where stakeholders flag that a timeline may not be realistic, or where a change may be cost prohibitive.

Turning now to the legislation being heard today, Introduction 1366, sponsored by Council Member Salaam, would "require the Department of Social Services (DSS) to create web forms for any forms that must be completed by an applicant to apply for benefits and services through DSS. The web forms would allow applicants to directly input information and electronically sign applications and forms online. DSS would be required to continue to accept paper applications and forms that [are] mailed, faxed, or delivered in person."

We are supportive of the aims of this legislation. That is why ACCESS HRA, our online benefits portal and mobile app for New York City residents, has served as a critical tool in connecting New Yorkers to benefits. We appreciate the constructive dialogue we have had with the Council thus far on Introduction 1366 and look forward to continuing to share our insights about our processes to use technology at our disposal to link New Yorkers to benefits. Note that our systems operate in the context of New York State and federal laws, regulations, and directives on various aspects of the benefits administration process, including applications, processing, security, and confidentiality. DSS works within the guardrails that State and federal oversight bodies have established. In addition, the way DSS operationalizes some of our programs does not lend itself well to an external web form apparatus. In some instances, staff and providers guide clients through a process; in those instances, web forms are not necessarily the best and most efficient way to enroll clients for those services. Nevertheless, with amendments to recognize that legal and regulatory context, we can support this legislation.

Introduction 1430, sponsored by Council Member Cabán, would "require the Department of Social Services (DSS) to provide confirmation notice in hard copy or electronically to applicants of public assistance regarding their benefits interview. The notice would include a confirmation number, the date, time and location of the interview, the phone number from which the interview was conducted if the interview is via telephone, and any other relevant information."

We support providing applicants with the information they need as they proceed through the benefits application process.

If I may briefly review the current process for interviewing for Cash Assistance (CA) and Supplemental Nutrition Assistance Program (SNAP) application and recertification interviews; the process proceeds along two tracks. One track is for linked CA and SNAP applications and recertifications on the one side, and the other track is exclusively CA applications on the other side.

For CA and SNAP applications and recertifications the process is as follows:

- The client submits an application or recertification and calls for an on-demand interview.
- At the end of the interview, the system automatically generates the interview kept status and the receipt.
- The kept interview notification is available on Access HRA for SNAP immediately.
- The interview receipt (FIA-1173) is placed in the print-to-mail queue to be mailed and is electronically added to the case file for both SNAP and CA.
- The receipt is physically mailed within 1 to 5 days.
- The notice (FIA-1173) is available on Access HRA when it has completed the print-to-mail queue.
- Once mailed, the document becomes available in One Viewer and Access HRA.

For CA application and recertification interviews, the interview status is not currently available online. We would have to build the functionality to add interview status to our system.

We would like to have further discussion with the Council about the bill to clarify the scope of programs covered, to accommodate measures necessary to prevent phishing and fraud attempts targeting clients, and to flag the confirmation number, location, and phone number data points identified in the legislation which are at variance with current operations. For Cash Assistance, our assessment thus far is that ninety days for implementation would not be sufficient to make adjustments to information technology systems to implement the change this proposal requires.

Introduction 1458, sponsored by Council Member Brewer, is "in relation to the procedure for determining that a dwelling unit is habitable for the purposes of the CityFHEPS program," laying out requirements for DSS deeming a dwelling unit habitable before approving CityFHEPS rental assistance for the unit. Introduction 1458 defines certain conditions as "major" and "minor," and describes how DSS should proceed given such conditions.

DSS agrees with the spirit of this legislation as we too want to use the tools in our toolbox to sensibly and safely expedite habitability inspections. That said, we would like to have further discussions with the Council on this legislation. There are three points I would like to share in this forum. First, as written, this legislation would require DSS conduct more in-person inspections than is our current practice. At present, DSS uses virtual inspections in certain defined circumstances to speed the process. As written, we believe this legislation would roll back our ability to conduct virtual inspections and slow some of our efforts to accelerate the inspection process. Second, DSS is piloting an effort to expedite the unit inspection process. We aim to gain insights from this pilot to further refine our process for addressing habitability concerns. Third, if the aim of this bill is to impose NYCHA public housing habitability assessments on the CityFHEPS program, I would make the point that the two programs are incongruent. Therefore, having this checklist of requirements – including in-person inspections – would only serve to delay a process that we are doing our best to expedite as much as possible so we can get people housed quickly without compromising habitability and safety concerns for clients

Introduction 1459, sponsored by Council Member Brewer, would require DSS to submit to the Mayor, Council Speaker, and to include in the Mayor's Management Report (MMR), the average time it takes for an individual to secure housing after receiving a housing voucher.

We support transparency and delivering accurate, timely, actionable information to stakeholders to assist in making informed assessments, and ultimately, public policy choices. In the case of Introduction 1459, we would want further discussion with Council about the metrics involved in this legislation

Introduction 1477, sponsored by Council Member Brewer, would require DSS to respond to an application for CityFHEPS within 15 days after receiving the application; the response would inform the applicant of whether the application has been approved, denied, or requires correction or additional information.

There are many factors in managing the CityFHEPS applications. Although we would like to strive for the 15-day goal, legislating the agency respond within 15 days may be unrealistic, considering our current average is 23 days from completed rental application to decision. Once we receive an application, we work with the housing specialist and provider to make sure the information we have is as up to date as possible. Through that process, we do our best to keep the clients informed of the status of their application. Clients' check ins with case managers regarding their Independent Living Plans (ILPs) are a key avenue for sharing information and updates as to application status; ILP check ins occur biweekly.

On behalf of my colleagues, I would also like to take this opportunity to recognize Deputy Speaker Ayala's leadership of the Committee on General Welfare. The lived experiences you have shared and the deep knowledge and insights you bring to our work of benefits administration and human services will live on far beyond your tenure as chair of this committee and we are all thankful and better off for having worked with such a fierce advocate for New Yorkers in need.

We appreciate the opportunity to testify today and welcome your questions.



## STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS TO THE NEW YORK CITY COUNCIL COMMITTEE ON GENERAL WELFARE DECEMBER 3, 2025

#### Good Morning,

My name is Jumaane D. Williams, the Public Advocate for the City of New York. Thank you to Chair Ayala and committee members for holding this hearing.

There has been a legal battle between the City Council and Mayor Adams administration over the implementation of CityFHEPS reform laws (<u>Local Law 99-2023 - Local Law 102-2023</u>) which was passed by the Council and enacted in 2023. The City Council's reforms aim to remove shelter stay requirements, expand eligibility to households at risk of eviction, and stop the city from deducting a utility allowance from the maximum voucher amount.

The Adams administration challenged these laws, causing delays in implementation. Groups like The Legal Aid Society then sued to force implementation.<sup>2</sup> Int. 1372-2025 sponsored by Chair Ayala was passed by the City Council in October 2025, intending to block increased rent contributions for some CityFHEPS voucher holders from 30% to 40% of their income after five years.<sup>3</sup> Mayor Adams subsequently vetoed this legislation in November 2025.<sup>4</sup>

During the January 2025 Committee on General Welfare hearing, Molly Park, Commissioner of the Department of Social Services (DSS), reported that the CityFHEPS program achieved significant progress in Fiscal Year (FY) 2024. This was noted despite persistent, controversial disputes with the Adams administration. Commissioner Park reported that the number of households securing apartments with CityFHEPS vouchers reached nearly 14,000, representing a substantial 42% increase from FY 2023.<sup>5</sup> Additionally, the city connected over 18,500 households to subsidized permanent housing in 2024, an achievement that marks a 24% rise over the previous year.<sup>6</sup> This progress occurred despite New York City's historically low overall vacancy rate of 1.4%, the lowest level since 1968.<sup>7</sup>

The persistent low vacancy rates in the city continue to impact the ability of CityFHEPS voucher holders to secure affordable housing. Contrary to the program's goal of offering

<sup>&</sup>lt;sup>1</sup> City must start implementing Council's housing voucher expansion, court rules — Queens Daily Eagle

<sup>&</sup>lt;sup>2</sup> Council Loses Lawsuit Over Housing Voucher Program Expansion

<sup>&</sup>lt;sup>3</sup> Adams Vetoes Anti Rent-Hike Law, Widening Council Battle Over Vouchers

<sup>&</sup>lt;sup>4</sup> Statement from New York City Council on Mayor Adams' Vetoes of Legislation to Support Working-Class New Yorkers, Address Inequities, and Codify Mayor's Office of Contract Services

<sup>&</sup>lt;sup>5</sup> NYC Voucher Households Are Concentrated in a Handful of Neighborhoods, Data Shows - City Limits

<sup>&</sup>lt;sup>6</sup> Department of Social Services commissioner discusses shelters and more

<sup>&</sup>lt;sup>7</sup> New York City's Vacancy Rate Reaches Historic Low of 1.4 Percent, Demanding Urgent Action

tenants more choice, drastically rising housing costs have ensured voucher households remain highly concentrated in only a few neighborhoods—predominantly in the Bronx and Southeast Brooklyn.<sup>8</sup>

The City Council's CityFHEPS reforms align with Mayor-elect Mamdani's campaign's focus on increasing affordability for New Yorkers. We are hopeful that the new mayoral administration will offer less resistance to program changes. Furthermore, DSS should continue to seek and share effective strategies for increasing the placement of individuals into leased apartments or subsidized permanent housing.

My office is committed to advocating for systemic improvements within DSS and the City's rental assistance programs, particularly CityFHEPS. The delays, confusion, and administrative hurdles currently faced by our constituents seeking public assistance and housing stability are unacceptable. To address these critical issues, I lend my support to two key pieces of legislation designed to streamline processes and ensure greater transparency and efficiency in the delivery of these essential services: <a href="Int.1430-2025">Int. 1430-2025</a>, introduced by Councilmember (CM) Caban, would mandate that DSS provide public assistance applicants with a confirmation notice regarding their benefits interview. <a href="Int.1477-2025">Int. 1477-2025</a>, introduced by CM Brewer, aims to improve response times for CityFHEPS applications.

Thank you.

<sup>8</sup> NYC Voucher Households Are Concentrated in a Handful of Neighborhoods, Data Shows - City Limits



#### Testimony of Win on CityFHEPS Reforms for the General Welfare Hearing December 3, 2025

Thank you, Chair Ayala, and the esteemed members of the Committee on General Welfare for the opportunity to submit testimony today. My name is Chris Mann, and I am the Assistant Vice President of Policy and Advocacy at Win, the largest provider of shelter and supportive housing for families with children 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 3,800 children.

New York City continues to face a record-breaking homelessness crisis. CityFHEPS, New York City's rental assistance voucher, remains our most potent tool for ending this crisis. However, for years, a litany of administrative issues, ranging from inspection delays to payment processing issues, has undermined the program, keeping families in shelters far longer than necessary.

For example, a Win client and her daughter were connected to an apartment in February 2025 and submitted all required paperwork. A simple error, an incorrectly listed landlord name on the preclearance, stalled the process for months. By the time the City corrected the landlord's information in June, her case had disappeared from the CuRent system due to a technical glitch. After the issue was finally resolved in July, the prolonged delays meant she needed a rebudget, and ultimately, after losing her job during this period, she no longer qualified for the voucher and lost the apartment. She remains in shelter today.

Another Win client and her two children entered shelter in April 2024 and received a two-bedroom voucher that fall. After being linked to an apartment in March, the placement was held up because the City's system flagged the unit's ZIP code as incorrect—even after USPS confirmed it. While the family waited for a resolution, her voucher expired and was reissued, triggering the need for a new budget. Then, months into the process, HRA determined she had been issued a two-bedroom voucher in error—causing her to lose the apartment entirely. More than a year and a half after entering shelter, she and her children remain without housing.

A third family, led by a mother of three, was connected to an apartment in September. Their move has been blocked solely because the City's system lists the landlord incorrectly as an LLC rather than an HDFC. Despite repeated tickets requesting a correction, the issue remains unresolved. Even if fixed today, the family will be forced to wait until at least January 1st to move in.

These cases reflect systemic, avoidable breakdowns that prevent CityFHEPS from functioning as intended and keep families in shelter for months longer than necessary.

#### **Progress on Administrative Reforms**

In the face of continued CityFHEPS administrative challenges, this City Council under the



leadership of Speaker Adams has consistently made improving the program a top priority. We are heartened that the City Council is hearing several bills today that Win helped craft, legislation that directly addresses the administrative bottlenecks we have long identified.

Specifically, Win was proud to work with Council Member Gale Brewer on crafting several pieces of legislation being heard today. Intro 1458, which we strongly support, is a bill designed to speed up inspection times. For too long, families have lost apartments because of minor inspection failures that trigger weeks of delays. Intro 1458 tackles this by establishing a hierarchy of issues in inspections. Crucially, it creates a process for resolving minor issues without requiring a full reinspection, including a provision for fixing issues on the spot. This allows inspectors or landlords to immediately address low-cost fixes, such as missing window guards, light bulbs, and outlet plates, preventing unnecessary failures and getting families into homes faster.

We also strongly support Intro 1477 (CM Brewer), which would require CityFHEPS applications to be processed within 15 days. Currently, the uncertainty of approval timelines leaves families in limbo. By mandating that the department inform applicants of a determination no more than 15 days after submission, we can provide the certainty families need to plan their futures.

Furthermore, we strongly support Intro 1459 (CM Brewer) to increase transparency around CityFHEPS processing. This bill requires the Department of Social Services (DSS) to submit to the Mayor and the Speaker and include in the Mayor's Management Report (MMR), the average time it takes for an individual to secure housing after receiving a voucher. This data is essential for holding the system accountable and tracking progress.

Additionally, we strongly support for Council Member Restler's bill, Intro 1472, which requires CityFHEPS payments to be made within 7 days. This bill mandates that DSS provide landlords with rental assistance payments within seven days of the scheduled payment date.

It is important to note that the inspiration for this legislation came from speaking directly with our clients and seek to address the struggles they face every day. These ideas were laid out in "Housing More New Yorkers," our joint report with The Real Estate Board of New York (REBNY). We are grateful to see the recommendations from that report, and the voices of our clients, translated into the concrete legislative action being heard today.

Finally, we support intro 1366 which requires DSS to provide all of their forms as fillable web forms, rather than only being available in paper and Intro 1430, which would require DSS to provide confirmation notice regarding benefits interviews in hard copy or electronically.

#### **Remaining Technical Barriers**

While we celebrate these bills, we must also continue to push for modernization in the systems used to process these vouchers. The "CuRent" application system and AccessHRA still require



significant improvements. Clients still lack a centralized, user-friendly portal to upload pay stubs directly, bypassing the need for intermediaries. Additionally the restrictive \$100 dollar rule constantly triggers unnecessary rebudgeting and should be broadened significantly to account for normal shifts in income that almost all hourly wage employees experience. We urge the Administration to prioritize the integration of all CityFHEPS functionalities into AccessHRA and to ensure that any updates to the "Current" system include name-based search functions and dashboards to streamline case management.

#### **Expanding Eligibility**

Although fixing administrative issues is a top priority, Win remains deeply committed to expanding eligibility for this vital program. Again, we thank the City Council for their unwavering leadership in this area. The CityFHEPS expansion legislation passed in 2023 will be a gamechanger once finally implemented, which looks to be on track once Mayor elect Mamdani takes office. But, as we grapple with the homelessness crisis, we must ensure that families without legal immigration status also gain access to the voucher. Currently, most migrant families, many of whom are fleeing violence and persecution, are blocked from using rental assistance, leading to long-term shelter stays. Win continues to support calls for the state and city to find pathways to expand CityFHEPS to all New Yorkers, regardless of immigration status. Doing so is not only humane but fiscally responsible, potentially saving the City billions in shelter costs.

#### Conclusion

CityFHEPS holds tremendous potential. The bills heard today, Intros 1458, 1477, 1459, and 1472 represent a massive step toward realizing that potential. By modernizing processes, mandating strict timelines, and enforcing transparency, the Council is helping ensure that CityFHEPS fulfills its promise.

Win is grateful for the Council's leadership and proud to have helped shape many of the solutions being discussed today. We stand ready to support implementation and to continue collaborating with the Council and the Administration to ensure all New York families have a safe, stable place to call home.

Thank you for the opportunity to testify. I am happy to answer any questions or provide additional information.



#### Families Can't Wait: Every Delay Means More Time in Shelter

Administrative failures in the CityFHEPS program are not mere bureaucratic inconveniences—they have real, destabilizing consequences for families trying to secure stable housing. Delays, errors, and system breakdowns routinely derail placements, cause vouchers to expire, and prolong shelter stays for months. The three cases outlined below are just a snapshot of what Win families face every day, and thousands of New Yorkers have experienced similar barriers that prevent them from leaving shelter and rebuilding their lives.

#### • Win Mother and Daughter

In February 2025 this family was connected to an apartment and submitted all required paperwork. A simple error, an incorrectly listed landlord name on the preclearance, stalled the process for months. By the time the City corrected the landlord's information in June, her case had disappeared from the Current system due to a technical glitch. After the issue was finally resolved in July, the prolonged delays meant she needed a rebudget, and ultimately, after losing her job during this period, she no longer qualified for the voucher and lost the apartment. She remains in shelter today.

#### • Win Mother of Two

This family entered shelter in April 2024 and received a two-bedroom voucher that fall. After being linked to an apartment in March, the placement was held up because the City's system flagged the unit's ZIP code as incorrect—even after USPS confirmed it. While the family waited for a resolution, her voucher expired and was reissued, triggering the need for a new budget. Then, months into the process, HRA determined she had been issued a two-bedroom voucher in error—causing her to lose the apartment entirely. More than a year and a half after entering shelter, she and her children remain without housing.

#### Win Mother of Three

This family was connected to an apartment in September. Their move has been blocked solely because the City's system lists the landlord incorrectly as an LLC rather than an HDFC. Despite repeated tickets requesting a correction, the issue remains unresolved. Even if fixed today, the family will be forced to wait until at least January 1st to move in.



Housing vouchers are the most effective tool New York City has to combat the City's homelessness crisis. Yet, the systems that connect New Yorkers to subsidized housing remain deeply flawed. Voucher holders encounter lengthy administrative delays, inconsistent inspection processes, endless documentation requirements, and barriers that limit their housing opportunities. For instance, the median time to lease-up a homeless set-aside unit in a new building was 235 days in FY25 according to the Mayors Management Report. This is a crisis of management and can be fixed by better procedures without requiring an enormous allocation of funds. Oftentimes the affordable housing crisis pits tenants and landlords against each other, but the below reforms, supported by landlords and tenants offer a win-win for both. It's time for the City to stop playing games with housing and address these issues by:

#### Improving CityFHEPS and increasing transparency by passing:

- <u>Intro 1458</u> (CM Brewer) To speed up inspection times by establishing a hierarchy of issues in inspections to establish a process for resolving minor issues without requiring reinspection including the provision for fixing minor issues on the spot such as missing window guards, light bulbs, outlet plates, and other low-cost fixes.
- <u>Intro 1472</u> (CM Restler) To require CityFHEPS payments be made within 7 day by requiring that the Department of Social Services provide landlords with rental assistance payments within seven (7) days of the scheduled payment date.
- Intro 1477 (CM Brewer) To require CityFHEPS applications be processed within 15 days by requiring that upon submission of a complete tenant-based rental assistance application, the department shall inform the applicant of the determination of approval no more than fifteen (15) days after submission.
- Intro 1459 (CM Brewer) Increase transparency around CityFHEPS processing by requiring the Department of Social Services (DSS) to submit to the Mayor and the Speaker of the Council, and to include in the Mayor's Management Report (MMR) the average time it takes for an individual to secure housing after receiving a housing voucher.



Although passing legislation is critical, better management is key. The next Mayor should:

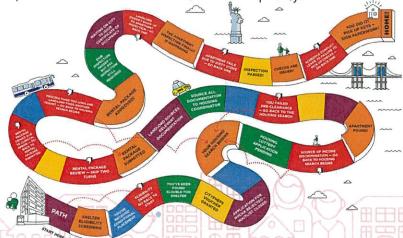
Consolidate Housing and Homelessness Under One Deputy Mayor: Treating housing and homelessness as separate issues has hindered progress, and aligning these agencies is essential to a coordinated, housing-focused strategy. This will ensure housing and social services work together toward the shared goal of reducing homelessness.

**Eliminate Redundancies:** Unfortunately, there are a myriad of instances where multiple agencies require the same documentation and inspections. For instance, once the Department of Buildings (DOB) completes inspections for new construction with homeless set-aside units, DSS should not require a second, duplicative inspection.

**Stop Making Poor People Prove They Are Poor:** Duplicative documentation requirements create significant administrative burdens for the very people that housing programs seek to help. Documentation requirements are onerous, and then the paperwork goes stale after 90 days or 6 months, and then the whole cycle begins again, collecting all the same paperwork again while affordable units remain vacant and families languish in shelter.

Identify Tenants While Buildings Are Under Construction: The City should run housing lotteries and complete eligibility screenings during construction so tenants can move in immediately once a Certificate of Occupancy is issued. This would reduce delays and speed up the occupancy of new units.

Allow Shelters to Directly Refer Clients to Vacant Units: Shelters should be allowed to refer clients directly to vacant affordable and supportive housing units instead of relying solely on slow and inconsistent intermediaries like Housing Connect and CAPS. Eliminating these bottlenecks would reduce vacancies and help move families out of shelter more quickly.





# 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.<sup>1</sup>

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 coauthored 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).

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#### Introduction

Since its implementation in 2014, CityFHEPS has supported nearly 150,000 New Yorkers in 63,000 households.<sup>2</sup> 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. 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. 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.<sup>6</sup> 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.<sup>7</sup>

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.

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# 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

"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."

#### Administrative Delays

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. 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. 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

"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."

# Challenges with Technology and Personnel

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. 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. 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

# "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."

# Issues with Payment Standards

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. 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.<sup>13</sup>

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

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.<sup>14</sup>

# Source of Income Discrimination

In 2008, New York City passed Source of Income anti-discrimination laws, prohibiting property owner discrimination against vouchers, among other legal sources of income. 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. 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.<sup>17</sup>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. 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

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.<sup>20</sup>

# The Affordable Housing Lottery

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.<sup>21</sup>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.<sup>22</sup> 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).<sup>23</sup> 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

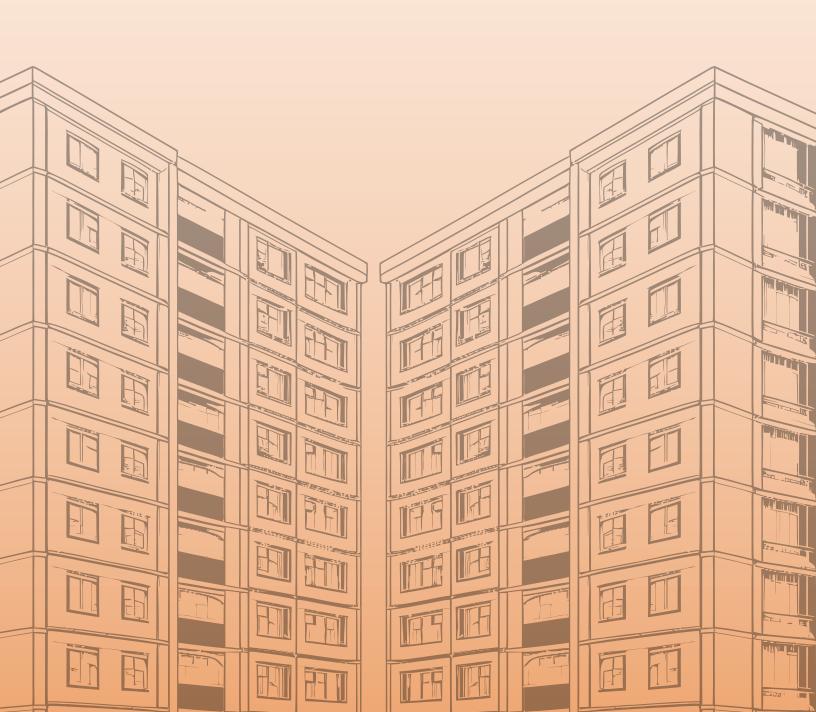
The Council should enact legislation establishing a pilot to initiate lotteries during project construction and prior to completion to reduce the length of vacancy and lease-up for habitable units. According to Comptroller Brad Lander's review of DSS's programs and services, clients who leave shelter for a housing option with subsidized rent fare much better. 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. <sup>25</sup> 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). 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.<sup>27</sup>

### **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.<sup>28</sup> 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.<sup>31</sup>

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: <a href="https://legalaidnyc.org/get-help/housing-problems/what-you-need-to-know-about-hras-family-homelessness-eviction-prevention-supplement/">https://legalaidnyc.org/get-help/housing-problems/what-you-need-to-know-about-hras-family-homelessness-eviction-prevention-supplement/</a>
  - 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/CITYFEPS/CITYFEPS-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: <a href="https://www.nyc.gov/site/hra/help/property-owners.page">https://www.nyc.gov/site/hra/help/property-owners.page</a>
  - d. CityFHEPS Documents: <a href="https://www.nyc.gov/site/hra/help/cityfheps-documents.page">https://www.nyc.gov/site/hra/help/cityfheps-documents.page</a>
- 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: <a href="https://www.nyc.gov/site/hpd/services-and-information/section-8-voucher-types.page">https://www.nyc.gov/site/hpd/services-and-information/section-8-voucher-types.page</a>
  - b. Section 8 Property Owner Guide: <a href="https://www.nyc.gov/site/nycha/section-8/guide-for-property-owners.page">https://www.nyc.gov/site/nycha/section-8/guide-for-property-owners.page</a>
  - c. Voucher Payment Standards and Utility Standards: <a href="https://www.nyc.gov/site/nycha/section-8/voucher-payment-standards-vps-utility-allowance-schedule.page">https://www.nyc.gov/site/nycha/section-8/voucher-payment-standards-vps-utility-allowance-schedule.page</a>
  - d. Section 8 Tenants Frequently Asked Questions: https://www.nyc.gov/site/nycha/section-8/tenants-faq.page
  - e. Rent Reasonableness Frequently Asked Questions: <a href="https://www.nyc.gov/site/nycha/section-8/rent-reasonableness-faq.page">https://www.nyc.gov/site/nycha/section-8/rent-reasonableness-faq.page</a>
- 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: <a href="https://www.nyc.gov/site/nycccoc/ehv/ehv.page">https://www.nyc.gov/site/nycccoc/ehv/ehv.page</a>
  - b. EHV FAQ: <a href="https://www.nyc.gov/assets/nycccoc/downloads/pdf/ehv-faqs.pdf">https://www.nyc.gov/assets/nycccoc/downloads/pdf/ehv-faqs.pdf</a>
  - 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: <a href="https://www.nyc.gov/site/hra/help/hasa-faqs.page">https://www.nyc.gov/site/hra/help/hasa-faqs.page</a>
  - b. HASA Housing Options: <a href="https://www.health.ny.gov/professionals/patients/discharge\_planning/docs/2008-07-10">https://www.health.ny.gov/professionals/patients/discharge\_planning/docs/2008-07-10</a> 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. <a href="https://nyassembly.gov/write/upload/publichearing/001411/005558.pdf">https://nyassembly.gov/write/upload/publichearing/001411/005558.pdf</a>
- 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. <a href="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</a>
- 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. <a href="https://www.huduser.gov/portal/sites/default/files/pdf/Family-Options-Study-Full-Report.pdf">https://www.huduser.gov/portal/sites/default/files/pdf/Family-Options-Study-Full-Report.pdf</a>
- 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.000000000001588
- 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. <a href="https://cbcny.org/sites/default/files/media/files/CBCBLOG">https://cbcny.org/sites/default/files/media/files/CBCBLOG</a> FHEPS-Facts 05082023 0.pdf
- 8. Steinberg, Daniel, Varlack, Camille. "Mayor's Management Report: Preliminary Fiscal 2024." Mayor's Office of Operations, January 2024. <a href="https://gothamist.com/news/nyc-will-accept-section-8-applications-for-first-time-in-15-years-heres-what-to-know">https://gothamist.com/news/nyc-will-accept-section-8-applications-for-first-time-in-15-years-heres-what-to-know</a>
  - 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. <a href="https://www.nyc.gov/assets/nycha/downloads/pdf/sec8briefing-English.pdf">https://www.nyc.gov/assets/nycha/downloads/pdf/sec8briefing-English.pdf</a>; "CityFHEPS Frequently Asked Questions For Clients in the Community." NYC Department of Social Services, January 2024. <a href="https://www.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/dss-7r-e.pdf">https://www.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/dss-7r-e.pdf</a>
- 10. Riddle, Safiyah. "City Struggling to Connect Housing Benefits App to New Yorkers Who Need It Most." The City, February 2023. <a href="https://www.thecity.nyc/2023/02/27/cityfheps-current-housing-eviction/">https://www.thecity.nyc/2023/02/27/cityfheps-current-housing-eviction/</a>
- 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. <a href="https://www.thecity.nyc/2023/02/10/cityfheps-harlem-tenants-eviction-notices/#:~:text=A%20landlord%20filed%2054%20Housing,by%20Safiyah%20Riddle%20Feb.">https://www.thecity.nyc/2023/02/10/cityfheps-harlem-tenants-eviction-notices/#:~:text=A%20landlord%20filed%2054%20Housing,by%20Safiyah%20Riddle%20Feb.</a>
- 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.

  <a href="https://www.nyc.gov/site/hpd/news/003-23/city-commits-3-1-million-combat-source-of-income-discrimination-reports-progress-made-on#/0">https://www.nyc.gov/site/hpd/news/003-23/city-commits-3-1-million-combat-source-of-income-discrimination-reports-progress-made-on#/0</a>
- 18. "Source of Income Discrimination." NYC Commission on Human Rights. <a href="https://www.nyc.gov/site/cchr/media/source-of-income.page">https://www.nyc.gov/site/cchr/media/source-of-income.page</a>
- 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. <a href="https://council.nyc.gov/wp-content/uploads/2024/04/FY25-Prelim-Budget-Response.pdf">https://council.nyc.gov/wp-content/uploads/2024/04/FY25-Prelim-Budget-Response.pdf</a>

### 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. <a href="https://www.nyc.gov/assets/home/downloads/pdf/office-of-the-mayor/2022/Housing-Blueprint.pdf">https://www.nyc.gov/assets/home/downloads/pdf/office-of-the-mayor/2022/Housing-Blueprint.pdf</a>
- 23. Katz, Jessica. "Brutal Bureaucracy Follow-Up." Citizens Housing & Planning Council, October 2023. <a href="https://chpcny.org/wp-content/uploads/2023/10/20231002">https://chpcny.org/wp-content/uploads/2023/10/20231002</a> 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. <a href="https://comptroller.nyc.gov/wp-content/uploads/documents/MD22-1055.pdf">https://comptroller.nyc.gov/wp-content/uploads/documents/MD22-1055.pdf</a>
- 25. Cabrera, Danny, Katz, Jessica. "Brutal Bureaucracy: NYC Housing Connect Analysis." Citizens Housing & Planning Council, November 2021. <a href="https://chpcny.org/wp-content/uploads/2023/05/CHPC-NYC-Housing-Connect.pdf">https://chpcny.org/wp-content/uploads/2023/05/CHPC-NYC-Housing-Connect.pdf</a>
- 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. <a href="https://www.ibo.nyc.ny.us/iboreports/CityFHEPS">https://www.ibo.nyc.ny.us/iboreports/CityFHEPS</a> 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. <a href="https://www.jchs.harvard.edu/sites/default/files/research/files/harvard\_jchs\_housing\_vouchers\_grantmaking\_dar\_in\_2023.pdf">https://www.jchs.harvard.edu/sites/default/files/research/files/harvard\_jchs\_housing\_vouchers\_grantmaking\_dar\_in\_2023.pdf</a>



REBNY Testimony | December 3, 2025

#### The Real Estate Board of New York to

# The City Council Committee on General Welfare regarding the Oversight Hearing on CityFHEPS

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY appreciates this opportunity to voice full support for the legislation before the Council today regarding the management of CityFHEPS vouchers.

New York City is in the midst of a well-documented housing crisis, with the lowest vacancy rate on record since 1968. While we need more housing to help solve that problem, the housing crisis is also one of affordability. 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. We are incredibly fortunate to have a City funded voucher program, and one where the value of those vouchers meets fair market rents. However, New York City's current administration of its housing voucher programs is flawed, and voucher holders regularly find their housing opportunities limited.

Among the many challenges with the current voucher system is the fact that it does not set up the voucher holder for success in their apartment search and keeps families in shelter longer. When competing for an apartment in a supply limited marketplace, the voucher holder is placed at a disadvantage to a non-voucher holder due to delays in approvals, requests for additional or redundant paperwork, and bureaucratic hurdles such as a lengthy and unpredictable inspection process.

New Yorkers deserve a functional voucher system that efficiently and effectively place families in homes and keeps them housed. To advocate for such a system, in 2024, Women in Need (Win) and REBNY co-authored the report <u>Housing More New Yorkers</u> to leverage our collective insights and experiences with the challenges besetting 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 outlined policy changes that need to address the following:

- 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; and
- Streamline the City's affordable housing lottery to get voucher holders into new units faster.

Intros 1458, 1459, and 1477 will address core challenges in the existing bureaucracy around the processing of CityFHEPS vouchers. Intro 1458 would institutionalize best practices around inspections, requiring the Department of Social Services to clearly delineate major versus minor areas of concerns which will in turn allow for the quicker mitigation and resolution of minor concerns so that a family can move in faster. The creation of an online portal for use by the agency, tenant, and property owner will increase transparency and ensure accountability for addressing issues in a timely manner. Intro 1459 will require the agency to track and report to the Mayor, Council, and include in the Mayor's Management Report, the average length of time it takes to secure housing after receiving a voucher. This will allow stakeholders to know for the first time how many voucher holders are searching for apartments each year. Lastly, Intro 1477 will require a City agency to respond to a voucher applicant within 15 days regarding voucher approval, disapproval or whether information is missing.

We thank Councilmember Brewer, Speaker Adams and the City Council, and Chris Quinn of Win for their continued leadership to ensure that the CityFHEPS voucher program is a success for tenants who need housing and the property owners who house them. Thank you once again for allowing REBNY to submit testimony in support of these important proposed bills.

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Testimony before the New York City Council
Public Hearing to the Committee on General Welfare
Oversight - The CityFHEPS Program
December 3, 2025

#### **Katie Liptak**

Special Assistant
Anthos | Home
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Good morning. My name is Katie Liptak, and I am the Special Assistant at Anthos |

Home. We are a nonprofit that helps New Yorkers experiencing homelessness move out

of shelter and into permanent housing as quickly as possible by bridging the gaps

between voucher holders, property providers, and government.

Thank you for the opportunity to testify before the Committee on General Welfare regarding the CityFHEPS program and the proposed local bills. In our daily work with voucher holders, our organization sees firsthand the significant challenges that voucher holders face, resulting in delays, denials, and prolonged shelter stays for the most vulnerable New Yorkers.

At the same time, we also see the transformative impact that thoughtful, streamlined processes can have, while maintaining the necessary checks and safeguards. Families can move into housing faster and have greater stability when challenges are removed.

The bills discussed here today represent exactly this type of progress. By prioritizing efficiency, clarity, and accessibility, Intros: 1366-2025, 1430-2025, 1458-2025, 1459-2025, and 1477-2025 will help ease and speed the housing process for voucher holders and landlords alike. Introducing web forms, providing benefits interview confirmation notices, reducing re-inspections, reducing payment and processing wait times, and increasing transparency are all measures that prioritize permanent housing while maintaining necessary processes. These targeted adjustments, along with recent

changes to the rebudgeting process that DSS has already made, will help reduce unnecessary barriers to moving families out of shelter and into homes.

Although these bills represent meaningful progress, more work remains. Anthos | Home has identified several additional process improvements that would significantly reduce delays and expand access to housing. Many of these align with recommendations from partner advocacy groups, such as the Family Homelessness Coalition, of which we are a member and whose testimony we support:

#### **Additional Recommendations**

every unit.

- Eliminate duplicative inspections
   For units that require a Department of Homeless Services (DHS) inspection,
   such as cellars and ground-floor apartments, DSS currently requires both a DHS inspection and a separate Human Resources Administration (HRA) inspection.
   Recommendation: Limit secondary inspections to a fraction of the units as a secondary review/audit procedure, rather than requiring two full inspections for
- Simplify the rebudgeting process
   Rebudgeting is triggered when household income changes by more than \$100 between the shopping letter and voucher package submission, a period that often spans months. Many voucher holders have variable income, making rebudgeting frequent and burdensome. During these delays, other time-sensitive documents often expire, further compounding the slowdown.

Recommendation: Issue the household share letter at the time of voucher package submission and allow income eligibility to remain valid for one year.

Standardize form and process changes

Currently, DSS updates forms throughout the year, and when changes are announced, all in-process packages must be resubmitted, even if nearly complete.

Recommendation: Limit form and process updates to once annually, and allow packages already submitted before the change to be evaluated under the previous guidelines.

Modify work requirement flexibility

The current 10-hour per week work requirement does not adequately account for the realities of variable hours, gig work, or active job searching.

Recommendation: Allow documented hours spent on job search or workforce development activities to count toward the work requirement.

Each of these changes would meaningfully reduce unnecessary hurdles to housing and cut down on the cycles of rejection, resubmission, and re-rejection that voucher holders experience. Small improvements like these have an outsized impact on the lives of families working to secure stable housing.

We urge the Council to vote yes on the bills being discussed here today, as well as to continue advancing reforms to help voucher holders access this incredible benefit and move out of shelters and into safe, permanent homes.

Thank you for your time and for your commitment to supporting New Yorkers experiencing homelessness. I welcome any questions you may have.



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#### **TESTIMONY OF:**

#### Alexandra Dougherty, Supervising Attorney Civil Justice Practice

#### **BROOKLYN DEFENDER SERVICES**

#### **Presented before**

The New York City Council Committee on General Welfare

#### Oversight Hearing—The CityFHEPS Program

**December 3, 2025** 

My name is Alexandra Dougherty, and I am a Supervising Attorney in the Civil Justice Practice at Brooklyn Defender Services. I want to thank the Committee on General Welfare and Chair Ayala for inviting us to testify about the CityFHEPS program. Adequate enforcement of our robust anti-discrimination laws is necessary to protect the right to affordable housing for all New Yorkers.

BDS is a public defense office whose mission is to provide outstanding representation and advocacy free of cost to people facing loss of freedom, family separation and other serious legal harms by the government. For 29 years, BDS has worked, in and out of court, to protect and uphold the rights of individuals and to change laws and systems that perpetuate injustice and inequality. BDS represents thousands of people each year who are accused of a crime, facing the removal of their children to the foster system, or challenging deportation. Our staff consists of specialized attorneys, social workers, investigators, paralegals, and administrative staff who are experts in their individual fields. BDS also provides a wide range of additional services for our clients, including civil legal advocacy, assistance with educational needs of our clients or their children, housing, and benefits advocacy, as well as immigration advice and representation.

BDS' Civil Justice Practice aims to reduce the civil collateral consequences for the people we serve who are involved with the criminal, family, or immigration legal systems. Our practice combats housing instability in a variety of ways: we defend people from eviction in housing court and provide proactive relocation assistance and benefits advocacy. We work with clients who are entering the shelter system as well as shelter residents attempting to secure stable housing. Through this work we see the profound challenges New Yorkers face in securing safe, affordable, and permanent housing.



#### **Background**

Amidst a persistent and escalating affordable housing crisis, the CityFHEPS program has been presented as the bridge to stable and affordable housing for New Yorkers experiencing homelessness or housing insecurity. However, despite changes to the program and City Council's commitment to further improving the program, CityFHEPS vouchers remain incredibly difficult to access and use. Since 2020, BDS has testified repeatedly in front of this committee and HRA about vital changes to the CityFHEPS process. Many of the problems we have identified, including extreme backlogs at Homebase, rampant source of income discrimination, and widespread errors in apartment approvals, remain prevalent. We enthusiastically support today's bills to address major issues with CityFHEPS and respectfully offer the following recommendations to further strengthen the program.

#### Recommendations

#### I. Eligibility and Voucher Issuance

Both people living in shelter and those facing eviction face significant obstacles to obtaining CityFHEPS vouchers. Many New Yorkers who meet all eligibility criteria still struggle to obtain vouchers. The city must ensure that all shelter and DHS staff have clear, accurate, and up-to-date, information on CityFHEPS eligibility. Many of the people we represent in shelter still wait months to be issued vouchers due to confusion and miscommunication over eligibility criteria. In several cases, people have been erroneously subjected to the 90-day shelter stay eligibility requirement, which was eliminated in 2023. We have also seen people we represent given contradictory information by shelter staff regarding immigration status requirements, despite establishing eligibility under PRUCOL.

Most of the people we represent facing eviction wait several months for a Homebase appointment to be assessed for CityFHEPS. Homebase remains the only organization that can screen people for CityFHEPS eligibility and issue shopping letters. The people we represent routinely wait six months or longer to get issued a shopping letter. By the time many people are issued shopping letters, their eviction cases have progressed in housing court and they have looming move-out deadlines. Delays waste valuable months that voucher-holders could be using to secure new housing.

It is vital that the city make sure that Homebase is adequately staffed, resourced, and trained, so that shopping letters can be issued and eligibility assessments completed in a timely fashion. In addition to today's bills, we encourage City Council to implement reporting requirements and time frame requirements regarding the initial CityFHEPS eligibility assessment stage. We also urge the City to allow other legal and social service providers to submit CityFHEPS applications on behalf of New Yorkers facing eviction. With only one organization authorized to serve all New Yorkers eligible for CityFHEPS, long delays will continue, and families will suffer devastating consequences.



#### II. Housing Search and Source of Income Discrimination

As we testified in 2021, 2023, and earlier this year, source of income discrimination remains virtually unchecked in New York City, and Homebase and shelter staff are not equipped to connect voucher-holders with landlords and brokers willing to work with them. The housing search process typically starts with a voucher holder reaching out to brokers via rental listing websites and private brokerage firms. Brokers then request a credit score and proof of income at least 40 times the monthly rent. In our experience, prospective tenants who respond with proof of their voucher rarely receive a response from the broker or they are told explicitly that the landlord does not accept vouchers. Despite New York City's protections again source-of-income discrimination, landlords and brokers know that enforcement is weak, and they are unlikely to be held accountable for denying housing to voucher holders. Due to this unchecked source-of-income discrimination, the people we serve regularly spend six months or longer attempting to secure housing with their vouchers, unnecessarily prolonging homelessness and housing instability.

One BDS client, Ms. C, recently called a broker during her housing search. The broker immediately inquired about her income, to which she accurately responded that she had a voucher and thus her income was not relevant. The broker stated that they do not currently accept clients with vouchers at the moment, incorrectly insisted that the rent exceeded the voucher limit, and refused to engage in further conversation. Ms. C reached out to her BDS Affordable Housing Specialist, who tried calling the broker back with Ms. C to help advocate. Even with a legal advocate on the phone, the broker continued to insist that they would not work with Ms. C. Although we advised Ms. C about her options for challenging this discrimination directly, she, like many of our clients, wanted to focus on her immediate housing search. BDS does engage directly with the Commission on Human Rights and files discrimination complaints, but for many of the people we serve their goal is to find housing and prioritize their apartment search.

Vouchers such as CityFHEPS and Section 8 are described by the city as the ticket to finding safe, affordable, and permanent housing. But vouchers themselves are meaningless if the agencies tasked with limiting discrimination by landlords and brokers are unable, due to lack of resources, to provide meaningful enforcement of these protections. Without this enforcement, our anti-discrimination laws are merely cosmetic, and our clients are unable to search for housing in any meaningful way. The Commission on Human Rights must be fully funded to enable voucher-holders to secure stable housing. The Council and HRA must work with the NYC Commission on Human Rights to enforce source of income discrimination laws and ensure that shelter and Homebase staff equip voucher-holders with the tools and resources they need to locate apartments.



While source of income discrimination is often rooted in racism, classism, and bias, many landlords and brokers also have legitimate concerns with the CityFHEPS program. For CityFHEPS to function, it is essential that landlords can trust the application process to run smoothly and that

payments will be issued timely and in full. As it stands, the CityFHEPS apartment approval process is extremely slow and onerous. Once tenants have gotten through the months-long wait for a voucher, overcome source of income discrimination, and found a landlord willing to work with them, they often wait up to three months for final approval and check issuance before they are able to move into their apartments.

Once a voucher-holder does secure an apartment, they are required to return to Homebase, where they struggle to reconnect with their original caseworker or are required to re-do the intake process and be reassigned a caseworker. It then routinely takes Homebase weeks to connect with brokers and landlords to begin the approval process. Once Homebase connects with the client and landlord, approval is a nine-step process, and it is common to see errors at multiple steps in the process. The first step, the pre-clearance can take weeks and often fails due to minor errors such as typos in the apartment number or landlord name. After the preclearance stage it can take weeks to set up an inspection. Once paperwork is submitted by the landlord it is reviewed by multiple levels at Homebase before being reviewed by HRA. This step often also takes several weeks, and yet we regularly see packets rejected due to errors or missing documents. Finally, once the apartment approval is issued, checks must be issued, picked up by Homebase, and dispersed to the landlord and broker. Check issuance can, again, take weeks, and mistakes are frequent.

Landlords know that the CityFHEPS program is riddled with errors, delays, and an overall lack of clear communication. For tenants without advocates to assist throughout the process, this can become an insurmountable obstacle. The Council and HRA must streamline the approval process by eliminating unnecessary steps, reducing errors, and facilitating clear communication with all parties. We strongly urge the Council to pass Int 1477-2025 establishing a time requirement for the approval process, and encourage additional measures to ensure adequate funding and training to expedite the approval process. The Council should require that HRA publish the expected timeline for each stage of the CityFHEPS application process and report on compliance.

#### **Conclusion**

BDS is grateful to New York City Council's General Welfare Committee for your time and consideration of our comments. We look forward to further discussing these and other issues that impact the people and communities we serve. If you have any additional questions, please contact Alexandra Dougherty, Supervising Attorney, at adougherty@bds.org.



#### Testimony of Patrick Boyle Senior Director, Policy and Communications Enterprise Community Partners, Inc.

#### To the New York City Council Committee on General Welfare Oversight Hearing on the CityFHEPS Program

#### **December 3, 2025**

My name is Patrick Boyle, and I am Senior Director of Policy & Communications for the New York office of Enterprise Community Partners, a national nonprofit that exists to make a good home possible for the millions of families without one. We support community development organizations on the ground, aggregate and invest capital for impact, advance housing policy at every level of government, and build and manage communities ourselves. Since our New York office opened in 1987, we have committed more than \$4.7 billion in equity, loans and grants to create or preserve nearly 70,000 affordable homes across New York City.

On behalf of Enterprise, thank you to Chair Ayala and the Committee on General Welfare for holding this hearing and for the opportunity to submit the following testimony.

#### Overview

CityFHEPS is one of the most important tools we have to combat New York's homelessness and affordable housing crises. As a local rental assistance resource, the program's funding, criteria and process rules are within our control, which is very powerful given the difficulty in seeking changes to the federally sourced Housing Choice Voucher, or Sec. 8, program. This allows policymakers to be flexible in how CityFHEPS is targeted, leading to innovations like allowing the voucher to be used outside New York City, and project-basing it through the Affordable Housing Services (AHS) program.

Enterprise has championed CityFHEPS recognizing the critical role that it plays helping families secure and stay stably housed. We also co-convene the Family Homelessness Coalition, one of the most active coalitions around expanding CityFHEPS, which this Council led on with a package of legislation in 2023 that unfortunately continues to be held up in legal limbo.

We oppose the recently enacted rule change by the Administration which increases some voucher recipients' rent burden to 40% of their income and also oppose the proposed rule change which eliminates the unit hold fee incentive, which is important for incentivizing more owner participation in the program.

All told, CityFHEPS is life changing for families, helping them move out of shelter and into permanent housing, while also providing financial support for affordable housing owners. Its



continued success will be necessary to solve our housing and homelessness crises, and that success will be contingent on robust funding and process improvements.

#### **Process Improvements**

Over the past year, Enterprise has convened affordable housing owners, marketing agents, housing navigators, shelter staff, policy organizations and those who have been through the housing placement process as applicants. We sought to understand the reason for lease up delays in affordable housing, including not only the Housing Connect lottery process, but also homeless set-aside units and CityFHEPS.

We heard from many that CityFHEPS was a persistent and frustrating source of delay, with roadblocks for both owners and voucher holders. These delays kept families in shelter longer than necessary and kept affordable units vacant, which has contributed to a crisis in affordable housing operations.

The CityFHEPS approval process is too convoluted. Based on our conversations over the past year with experts in this space, we would like to highlight a number of recommendations to greatly expedite the process, one of which is addressed through legislation being heard at this hearing whereas others require further action.

#### 1. Reform the Budgeting Process

Income verification and rebudgeting, which is triggered when a household income changes by more than \$100 between the shopping letter stage and lease up, is the biggest delay for tenants. While some changes require state action, the city can increase the income change threshold that necessitates rebudgeting by either:

- 1) Directing DHS to provide updated tenant share letters through CurRent for incomeeligible applicants at the time of the package submission rather than require a full rebudgeting analysis be done by HRA, or;
- 2) Allowing service provider partners to do the rebudgeting analysis at the time of package submission rather than HRA.

#### 2. Inspections

Inspections serve an important purpose in the CityFHEPS process, highlighting potential habitability issues which should be rectified. However, this step is too often a source of delay without valid enough reason. We recommend that the city:

• Implement an Apartment Review Checklist (ARC) inspection hierarchy which would allow move-ins with non-hazardous 'fails', and provide clearer guidance to caseworkers on issues



that need immediate resolution versus issues that should not delay a tenant's move in. (Int. 1458).

- Clarify and publicize allowance of the G704 waiver, which allows for an inspection waiver for new construction and the option of virtual inspections, which are not widely publicized to owners.
- Eliminate the duplicative inspection requirements for ground floor units, which require a separate inspection by the Department of Social Services (DSS) CAR unit. The city can add ARC specific items to a DOB checklist to streamline inspections for new construction and have the CAR unit conduct randomized audits of existing buildings.
- Allow ARC inspections to stand for 1 year to prevent the need for re-inspections after a tenant declines an apartment or lease-up falls through.

#### 3. Landlord-facing Reforms

CityFHEPS processing places a significant administrative burden on owners, which can be reduced by:

- Streamlining check issuance by combining the two separate shelter allowance checks that make up CityFHEPS into a single payment and allow for direct deposits.
- Shift to a building-wide registration process for all local vouchers in subsidized affordable
  housing. This would eliminate duplicative unit-by-unit submissions and reduce the
  administrative burden on property owners and on DHS and HRA staff, who currently
  manage redundant preclearance, inspections, and package reviews already covered by
  HPD's finance closing and annual registration processes.
- Allow for move-ins with owner approval while the voucher process is still being finalized.

#### **Additional Transparency and Data**

We support Int. 1459 and Int. 1477 which respectively call for more CityFHEPS reporting in the Mayor's Management Report and would institute time frames for holding city agencies accountable on CityFHEPS steps, as both are important in allowing advocates and the public to track success metrics on this vital program. Both should be strongly considered as we all work toward a shared goal of ensuring CityFHEPS is as strong as the city and the families it is intended to serve need it to be.

Thank you for your consideration.



#### **Testimony of the Family Homelessness Coalition**

#### New York City Council Committee on General Welfare Oversight – The CityFHEPS Program

#### **December 3, 2025**

The Family Homelessness Coalition (FHC) is made up of 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.

We would like to thank Chair Ayala and members of the General Welfare Committee for holding this important hearing and for allowing us to submit the following testimony.

#### Overview

Data has shown that nearly one in seven New York City public school students experienced homelessness during the 2024-25 school year, marking the first academic year in which the total number of children in temporary housing exceeded 150,000. The overall rate of student homelessness rose in every borough compared to the year before. We have long understood that we have a crisis in family homelessness in our city. CityFHEPS is perhaps our single most important resource to combat that crisis.

FHC continues to advocate for the full implementation of the CityFHEPS expansion that was passed into law in 2023 and has since been held up in legal processes. Particularly with uncertainty at the federal level, it is imperative for the city to continue to ensure robust funding and streamlined processing for CityFHEPS. We remain opposed to the rule change underway that increases some CityFHEPS recipients' rent burden from 30% to 40% of income. We also oppose the proposed elimination of the unit hold fee, an important incentive to ensure participation in the program by owners.

#### **Process Improvements**

As important as this program is, we know that there are significant administrative burdens that prevent it from working at its best. The processing, approval, and inspection protocols are needlessly complex and prevent families from accessing this lifesaving tool. In order to enhance oversight, address these barriers, and ensure that the program works as efficiently as possible, we

<sup>&</sup>lt;sup>1</sup> https://advocatesforchildren.org/policy-resource/student-homelessness-data-2025/

recommend the following reforms to the administration of CityFHEPS, some of which are addressed in the legislative package being heard today and some of which require further action.

- Streamline the voucher process by income certifying someone as eligible for CityFHEPS upfront at the shopping letter stage and allowing that income eligibility and tenant share to be valid for a year before a new process is required. This protocol would be consistent with other HRA benefits eligibility.
  - If Community Based Organizations have WMS access, they could do this income eligibility assessment directly rather than require HRA staff to do so, including making adjustments as needed if incomes of applicants decrease.
    - Alternatives to this approach to income eligibility could be effective at reducing lease up delays that regularly occur due to the rebudgeting process, which occurs when a household's budget changes by over \$100 between shopping letter issuance and voucher package submission common for households with variable income. DHS states that rebudgeting takes 72 hours, but the wait is typically longer in one analysis, the average wait time for rebudgeting at one agency was 16 days, with some instances taking months. Rebudgeting delays impact other time-sensitive documents, compounding delays and keeping voucher holders in shelter. Alternative approaches include:
      - Option 1: DHS issues household share letter via CurRent, their online processing system, at the time of voucher package submission, provided income meets the requirement. *This would eliminate the need for rebudgeting at package submission*.
      - Option 2: Approved service providers perform rebudget analysis and confirm documents at the voucher package submission phase instead of the Human Resources Administration (HRA). This would reduce the burden on government and shelter staff and reduce processing delays.
      - Option 3: HRA modifies requirements so that rebudgeting is only necessary when income changes by over \$500, and allows for the household share letter to be issued by DHS. *This would reduce the overall number of rebudgets*.
      - <u>Additional Improvement:</u> DHS/HRA provide the reason why a voucher holder is no longer eligible when rebudget requests are rejected. *This would reduce rebudgeting delays and allow voucher holders to resubmit requests more quickly.*

- Address inspection rules that require a unit from DHS to inspect first floor units. Waiting
  for DHS to inspect these units upfront causes significant delays in placing voucher
  holders in units.
  - Delegate authority of inspecting units to community-based partners that currently do all voucher inspection for all other units. The CAR unit would ensure quality through post move-in audits, and would require landlords to make any necessary fixes expeditiously.
- Expand existing CityFHEPS data transparency requirements to identify more adequate solutions to challenges faced by voucher holders during processing and utilization of vouchers. In addition to current metrics, HRA should also be required to report on:
  - o Length of time between issuance of first shopping letter and lease-up
  - o Length of time between initial package submission and lease-up
  - o Number of households enrolled in CityFHEPS
  - o Number of people enrolled in CityFHEPS
  - o Average monthly subsidy and client contribution
  - o Average length of time voucher holders have been enrolled in CityFHEPS
  - o Percent of new monthly voucher holders that exit shelter
  - Number and/or percentage of vouchers that expire and are not renewed and reason for non-renewal
  - o Number of restorations and reason the restoration was granted
  - o Rate of eligibility and reasons for intelligibility of subsidies
  - o Average number of package submissions before lease-up
  - o Shelter re-entry after 5 years of exit along with subsidy type at exit

#### Legislation

As a Coalition, we support the package of legislation being heard at today's hearing (Ints. 1366, 1430, 1458, 1459 and 1477). These bills will collectively reform the inspection process, increase notifications that will help clarify the process for applicants, and provide overall data transparency that will assist advocates in tracking CityFHEPS outcomes. We urge their enactment.

However, there are additional steps as outlined above which are also needed to reduce delays and streamline CityFHEPS and which are not covered by this legislative package. More needs to be done to reduce barriers and bureaucracy in a way that speeds housing placements.

On behalf of FHC, thank you for the opportunity to submit testimony.



#### **HOMELESS SERVICES UNITED**

5 HANOVER SQUARE, 9TH FLOOR NEW YORK, NY 10004 www.HSUnited.org

## Testimony of Homeless Services United New York City Council Committee on General Welfare Oversight – The CityFHEPS Program

#### December 3, 2025

My name is Victoria Leahy, and I am the Director of Policy & Planning at Homeless Services United. Homeless Services United (HSU) is a coalition representing over 50 mission-driven, homeless service providers in New York City. HSU advocates for the expansion of affordable housing and prevention services and for immediate access to safe, decent, emergency and transitional housing, outreach and drop-in services for homeless New Yorkers. Homeless Services United promotes effective solutions to end the crisis of homelessness in New York City.

We would like to thank Chair Ayala and members of the General Welfare Committee for holding this important hearing and for allowing us to submit the following testimony.

#### Overview

HSU continues to advocate for the full implementation of the CityFHEPS expansion that was passed into law in 2023 and has since been held up in legal processes. Particularly with uncertainty at the federal level, it is imperative for the city to continue to ensure robust funding and streamlined processing for CityFHEPS. We remain opposed to the rule change underway that increases some CityFHEPS recipients' rent burden from 30% to 40% of income. We also oppose the proposed elimination of the unit hold fee, an important incentive to ensure participation in the program by owners.

#### **Process Improvements**

As important as this program is, we know that there are significant administrative burdens that prevent it from working at its best. The processing, approval, and inspection protocols are needlessly complex and prevent families from accessing this lifesaving tool. In order to enhance oversight, address these barriers, and ensure that the program works as efficiently as possible, we recommend the following reforms to the administration of CityFHEPS, some of which are addressed in the legislative package being heard today and some of which require further action.

For example, in a recent discussion with our members, we learned that 80% of housing packages being submitted for clients in shelter are rejected on the first submission, and



#### **HOMELESS SERVICES UNITED**

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packages are often resubmitted several times before being approved. These issues are due to technical issues and certain policies (like rebudgeting and recertification) that are unnecessarily burdensome for clients to meet. This stage of the process should also be examined so we can speed housing placements for clients.

#### Legislation

We gladly support the package of legislation being heard at today's hearing (Intros 1366, 1430, 1458, 1459 and 1477). These bills will collectively reform the inspection process, increase notifications that will help clarify the process for applicants, and provide overall data transparency that will assist advocates in tracking CityFHEPS outcomes. We urge their enactment.

However, there are additional issues as mentioned above which also must be addressed to reduce delays and streamline CityFHEPS and which are not covered by this legislative package. More needs to be done to reduce barriers and bureaucracy in a way that speeds housing placements.

On behalf of HSU, thank you for the opportunity to submit testimony.



# New Destiny Housing's Testimony to New York City Council General Welfare Committee Oversight Hearing on the CityFHEPS Program by Maritza Rico, Policy and Advocacy Manager December 3, 2025

Thank you, New York City Council Deputy Speaker Ayala, members of the Committee on General Welfare, and Council Central Staff for the opportunity to submit written testimony on the legislative package on CityFHEPS process improvements.

#### **About New Destiny**

New Destiny is the only organization in New York City solely dedicated to the solution of permanent housing for survivors of domestic violence, the number one cause of family homelessness in the five boroughs. We operate the biggest and longest-running rapid rehousing program for survivors in our city. This program, which relies on funding from the U.S. Department of Housing and Urban Development (HUD) through the New York City continuum of Care (CoC), helps survivors with CityFHEPS, and other rental subsidies, find safe housing they can afford, while supportive services to promote long-term housing stability.

We are a co-convener of the <u>Family Homelessness Coalition (FHC)</u>, a group of organizations committed to tackling housing insecurity among families with children and people with lived experience of family homelessness in our city. New Destiny is also a member of the Supportive Housing Network of New York and the Association for Neighborhood & Housing Development.

#### **CityFHEPS**

We deeply appreciate the Council's efforts, especially from this committee, to address administrative burdens associated with the CityFHEPS program through this legislation package. The CityFHEPS program is critical for the more than 50,000 households, including survivors and children, who rely on it to afford their rent. Especially at a moment when the federal is dismantling housing programs, like the CoC, the city must prioritize the full implementation of the CityFHEPS expansion that was passed into law in 2023 and ensure robust funding and streamlined processing for CityFHEPS.

As we have testified in the past, we also oppose the proposed elimination of the unit hold fee, an important incentive to ensure participation in the program by property owners. Alongside FHC, we applaud the Council's leadership in voting to override Mayor Adams's veto of legislation that will protect CityFHEPS recipients from rent increases.

New Destiny's housing navigators work directly with voucher holders every day and understand the dysfunctions of CityFHEPS. We know firsthand how vulnerable many of survivors are to return to homelessness or their abuser if they were to lose their voucher. New Destiny has gathered survivors' experiences, where CityFHEPS administrative issues have led to months long waits, re-admittance to shelter, and in the worst cases, returning to unsafe housing.

#### Introductions 1458, 1459, and 1477

New Destiny is grateful to Council Member Brewers for proposing this legislation package. These bills address the inspection process, response times to applications, and data reporting. We strongly support the intent, and we are encouraged by the focus on these issues. Upon careful review, New Destiny proposed a series of recommendations to further strengthen the bills and improve the CityFHEPS program.

Regarding **Intro 1458**, requiring DSS to conduct habitability assessments before approving a CityFHEPS units, we are very supportive of improvements to the inspection process. New Destiny is encouraged by the proposed changes that would allow for quick fixes to be made on the spot. We have questions as to how the proposed process interacts with the existing <u>Apartment Review Checklist (ARC)</u>, if these reiterates it or replaces it. Additional checklists might create confusion, repetition, and inefficiency.

Regarding **Intro 1459**, regarding lease-up time reporting, we are grateful for this effort that will greatly assist advocates in tracking CityFHEPS outcomes. New Destiny requests that the bill language specifies that "the issuance of a housing voucher" means issuance of a "shopping letter," for accurate time accounting. Further, we would like to request that additional data points are reported to make this information actionable, for instance, mandating that the lease-up time counting begins at the first shopping letter in the most recent bout of homelessness — as many times, several shopping letters are issued and expired before lease-up is completed. Additionally, reporting the number of shopping letters issued before lease-up per bout of homelessness would also be a necessary addition to make this reporting accurate and useful for advocates.

And finally, regarding **Intro 1477**, which mandates a 15-day response time to CityFHEPS applications from DSS. Speed is critical for survivors of domestic violence attempting to leave an unsafe situation. Yet, New Destiny has encountered issues with the application itself that quicker response times do not address. Minor issues, such as a typo or spelling out an acronym, can trigger a rejection of an application package altogether and require restarting the process. New Destiny is concerned that a mandated 15-day response time may lead to more rejections of applications. Greater flexibility for corrections to be made without requiring a new package submission would help ensure a smoother process. If this bill moves forward as written, we ask that the language specifies that this timeline accounts for both DHS <u>and</u> HRA review to prevent delays in both agencies.

New Destiny remains committed to working with the Council to ensure that the CityFHEPS program works efficiently. We are happy to answer all your questions.

Thank you for your leadership and the opportunity to submit written testimony.



Testimony by the New York Legal Assistance Group,

Oversight – The CityFHEPS Rental Assistance Program

Before the New York City Council Committee on General Welfare

December 3, 2025

Deputy Speaker Ayala, Council Members, and staff, thank you for the opportunity to speak to the Committee on General Welfare on the CityFHEPS Rental Assistance Program and Introduction Bills 1366-2025, 1430-2025, 1458-2025, 1459-2025, 1477-2025. My name is Graham Horn, and I am a Coordinating Attorney with the Shelter and Economic Stability Project at the New York Legal Assistance Group ("NYLAG").

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

The Shelter and Economic Stability Project at NYLAG provides free legal services and advocacy to low-income people in and trying to access public shelter in New York City, and those having trouble accessing or maintaining Public Assistance and SNAP (food stamp) benefits. We work to ensure that every New Yorker has a safe place to sleep by offering legal advice and representation throughout each step of the shelter application

process, assist and advocate for clients who are already in shelter as they navigate the transfer process, and seek adequate facility conditions and resources for their needs. We also represent clients at Administrative Fair Hearings, conduct advocacy with the Department of Social Services ("DSS"), Benefits Access Centers and SNAP centers, and bring impact litigation to ensure that our clients are obtaining and maintaining and adequate level of shelter and benefits.

We work with individuals and families who are in shelter waiting to become eligible for CityFHEPS, holding a shopping letter, in receipt of the voucher, and facing eviction in housing court because of problems with the administration of the benefit. NYLAG also has many clients who are in housing court and in need of rental assistance to preserve their affordable apartments, and who are still unable to access CityFHEPS vouchers, despite City Council's successful passage of bills improving and expanding further into the community the operation of this voucher program. NYLAG appreciates the leadership of the Council on this and many other issues, and we are committed to working with you to ensure the City implements these duly enacted laws.

As a result of my extensive experience addressing clients' issues with the operation of the CityFHEPS voucher program, I am grateful to have the opportunity to offer the following comments and recommendations and to support the bills under consideration today.

#### 1. CityFHEPS Expansion

We thank this Council for continuing to push for the expansion of CityFHEPS eligibility. Expanding eligibility for rental assistance to any applicant at risk of eviction or experiencing homelessness is a common-sense solution to help keep families stably housed and the shelter census down. Moreover, in many cases when households are evicted from stable and affordable apartments, that eviction will de-stabilize the apartment and diminish the city's affordable housing stock. Additionally, expanding rental subsidy eligibility criteria will lead to substantial savings for the City, as rental subsidies are far less costly than the costs of housing people in shelter. The expansion would benefit the city economically and would be a lifeline for families and individuals experiencing housing insecurity. We thank the Council for your heroic efforts on CityFHEPS expansion.

This fight is even more critical as federal plans threaten to divert funding from supportive and permanent housing and back toward shelter and warehousing spaces.

Shelter is meant to be a temporary and emergency support, named throughout the Code as "transitional housing facilities." And while HUD is proposing funding cuts to the federal Continuum of Care program that is estimated to result in the loss of homes for more than 170,000, cities and states must do all that they can to expand their assistance programs.

We are honored to stand with this Council in their continued push for expansions of the CityFHEPS program.

2. The Introduction Bills Under Consideration Today Will Improve Administrative Functioning of the CityFHEPS Program

Each of the five Intro Bills considered today represents progress towards an administratively functional public benefits and CityFHEPS program. Currently, the average length of stay for single adults and families in the shelter system is far too long. The most recent numbers from 2025 show that for families with children, adult families, and single adults the average length of stay is over a year (372, 379, and 378 respectively). These numbers are unacceptable. Shelter should only be a temporary occurrence to aid in the transition to affordable permanent housing, not a place where people languish.

The operation of the CityFHEPS program is currently impeded by widespread administrative delays, the particular causes of which on any given case are most often opaque to both participants and advocates. Clients report a frequent breakdown of information between their shelter caseworkers, DSS, and the landlords. If a willing landlord makes a mistake on the application (as often happens), it can take many days or even weeks before that information is relayed from DSS to shelter caseworkers and then back to the landlord. The landlords do not work directly with DSS, and information is often lost in the process. Clients report situations where forms are filled out incorrectly multiple times and landlords are not able to obtain clarification on how to correct issues with the forms. This confusing and time-consuming progress creates significant delays in exiting shelter and serves as a significant deterrent for landlords.

Intro 1366, requiring digital web forms for all DSS applications, will be beneficial to our clients in a variety of contexts, but may fall short of improving the CityFHEPS

application process as prospective tenants are not directly responsible for submitting application materials. However, a web portal where CityFHEPS applicants and recipients could check on the status of their applications, especially if it were possible to see which documents were outstanding or rejected, would dramatically improve clients' ability to navigate the CityFHEPS system on their own.

Intro 1477, requiring CityFHEPS application review and notice of status within 15 days, would be especially useful to NYLAG clients if they, the prospective tenants, were understood to be the "applicants" named in the proposed legislation. As mentioned above, CityFHEPS is not structured as an application that the prospective tenant completes on their own, but is instead managed by shelter staff (or Homebase) with documents from a variety of stakeholders. It is in fact this distance of remove from the submission of the application that makes it difficult for shopping letter holders to ascertain the status of their application. If this law could be written to give access to this application information to the prospective tenants themselves, it would be an enormous improvement, cutting through the opaque application process by providing application status transparency.

Intro 1430, requiring confirmation notices after the DSS eligibility interview, would similarly provide greater transparency and clarity to clients in the midst of applications and improve advocates' ability to follow up on CityFHEPS and other benefit applications. Far too often NYLAG clients report waiting for hours on the phone for an interview, sometimes to find out that the interview had already occurred, and often having to repeat the interview because it did not register in the system. A system automatically generating these

confirmations will aid in Fair Hearing advocacy as well, as it will create documentary evidence of the eligibility interview.

Intro 1458, requiring a quasi-virtual procedure for dwelling unit habitability inspections and submission of minor condition corrections, would add much needed efficiency to the CityFHEPS approval process. NYLAG strongly supports the requirement of an online portal for scheduling and provision of documentary evidence of condition correction. This Intro is thoughtful in its efforts to walk the line between expediency and safety, and clearly cognizant of possible lack of motivation to fix minor conditions if the apartment is deemed habitable before those conditions are corrected. NYLAG supports a balanced approach that aims to see voucher holders able to move into their apartments as quickly as is safe.

Intro 1459, requiring DSS to report annually on the average wait time between approval for a shopping letter and applicant move-in, would allow for fine-tuned monitoring of and responsive corrections to specific shelter sites. As discussed more fully below, such information is essential for monitoring a system dependent on a diffuse network of subcontracted employees.

If these bills are enacted, we will take many steps toward a transparent and accessible CityFHEPS program. Improving transparency in these ways will prove to have carry over effects such as decreasing landlord hesitancy to participate in the program and reducing the likelihood of apartment loss before lease signing.

#### 3. CityFHEPS Oversight

a. Housing Specialists are Critical to Reducing the Length of Stays in Shelter
Housing specialists are a critical component of the process for shelter residents to
transition out of the shelter system and into permanent housing. NYLAG represents many
residents of the DHS and HRA shelter systems. Too often we hear from clients that their
shelter does not currently have anyone serving as a housing specialist, or that the site's
director is serving in that role. Section 21-303 of the Administrative Code requires, as this
Council directed, that "housing specialists [...] serve in each transitional housing facility."
This support is vital to residents' efforts to navigate a hostile rental market, residents who
have a wide range of technological abilities and assistance needs.

Further, we regularly witness uncertainty and confusion about CityFHEPS eligibility criteria from shelter staff themselves. That same section of the Administrative Code provides that DHS shall be responsible for a training program which "shall include, but not be limited to, establishing expertise in the various housing programs to which eligible homeless persons may be referred." The risk and cost of error in deciding that a client is not eligible, who in fact should be, is obvious. The risk of the inverse, where a client is already visiting apartments with a false sense of security, involves lost time in seeking employment, seeking qualifying disability status, not to mention the suffering brought on by the emotional rollercoaster of such reversals.

To improve oversight of the opaque aspects of CityFHEPS administration, the Council included an annual reporting requirement to accompany these Code sections dealing with housing specialists. That section demands reports "regarding information on

housing specialists," to include "the number of housing specialists within all transitional housing facilities" as well as the "average caseload of housing specialists within each transitional housing facility." To date we have not seen any of those reports published, as required, on DHS's website, and we are not aware if they have been made available to Council.

Nearly every shelter client I work with is attempting to access and navigate the CityFHEPS voucher system. Far too often these cases require at least two layers of advocacy: (1) finding a community organization with capacity to directly take on the job and responsibilities properly assigned to DHS housing specialists (e.g., apartment search and communication assistance); and (2) advocating to DHS Office of Legal Affairs and other DSS departments to correct application submission materials on the City's side to ensure approval before loss of lease. This advocacy would be unnecessary were housing specialists better trained to understand the system they are ostensibly responsible for helping residents navigate. The reporting mandated by Section 21-303 is vital in order to ascertain where more attention to retraining is required and to ensure that our neighbors in shelter have access to those supports that will allow them to move on from transitional housing.

b. Continue to Improve the Functioning of the Approval Process for CityFHEPS Shopping Letters

There continue to be areas of needed administrative improvement for the CityFHEPS program. If the CityFHEPS application process were to be digitized, and more fully integrated within ACCESS HRA, and clients were able to self-submit documentation

that currently must pass through multiple hands, we would see fewer rejections on the basis of scrivener's errors and, as a result, quicker approvals. CityFHEPS applicants would also benefit from clear contacts at DSS for those moments when shelter or Agency staff is not moving forward with processing their application.

These persistent communication breakdowns are augmented by staffing shortages at DSS and Homebase. A program as vital as CityFHEPS to the health and safety of our neighbors deserves to be fully staffed from top to bottom. Otherwise, these cycles of delay, miscommunication, and noncommunication will continue to persist.

NYLAG urges this committee to be cognizant of the ways in which the expansion of case management services can be overseen and further resourced to ensure that these services are helpful to our clients. Providing more case management to homeless clients, including housing specialists and public benefits specialists, is another step in ensuring that shelter is an accessible and helpful resource on the path towards permanent housing. Increased staffing at all levels of the bureaucratic chain will bring internal and external relief: allowing DSS to be more responsive to issues and more communicative to their clients and community partners. Similarly, a digitized document system, which provides voucher-holder access to information about which documents have been accepted and rejected, would work to simplify the communication morass that currently plagues the CityFHEPS benefit system.

#### c. Strengthen CityFHEPS Administrative Processes as a Payor

A key component of the stability that permanent housing can provide is the reliability of rental assistance programs. NYLAG represents clients in Housing Court and people who are exiting the shelter system with CityFHEPS. Once approved, problems persist for our clients with the administration of the benefit itself. Clients report being unable to reach anyone at HRA to report changes and missing benefits. Our clients who rely on CityFHEPS vouchers report that HRA often does not pay their rent on time and sometimes will discontinue rental payments without notice to the landlord, or fail to recertify a client who submitted their recertification paperwork on time. We routinely represent clients who are in months of arrears without being made aware that CityFHEPS payments were not being made. For some, the problems persist for so long that they end up back in Housing Court and at risk of homelessness once again. The CityFHEPS voucher program can only provide meaningful support if attention is paid to its administration.

#### d. Address Delays in Regular Benefits Application Processing

DSS must be encouraged to address delays throughout their benefits systems.

Those eligible for a CityFHEPS voucher who are not current public assistance recipients or shelter residents are required to be screened for public assistance before their CityFHEPS can be approved. This means that a client must submit a public assistance application, complete an eligibility interview, and provide supporting documents, even if they are not eligible for ongoing public assistance. And, at the very least, these clients must have their case in "single issuance" status before a voucher can be activated.

Other problems with the administration of public assistance benefits affect

CityFHEPS recipients. Of particular concern is the functioning of the Homebase office – to
which DSS subcontracts its CityFHEPS operation for those residents not in shelter or
already otherwise in the community. These offices are generally described by clients as
inaccessible: not only do they not allow walk-ins at all, they are scheduling appointments
for six months out. These delays are not acceptable and may well constitute a breach of
duty on the part of the City.

We believe that these long delays would be dramatically reduced by increased staffing to the DSS interview lines, and to Homebase. Similarly, an online portal with participant access dedicated to administering the CityFHEPS program would work against many of the administrative delays mentioned above. Communication directly to clients requesting their recertification for CityFHEPS, as with all efforts to facilitate quicker and clearer communication, would prevent enormous harm to our clients and save the city and courts both time and money. We call on the Council to push for these administrative solutions, on top of the changes to the CityFHEPS program under consideration today and those additional changes that the Council continues to fight for.

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

Respectfully submitted,

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Sanctuary for Families Written Testimony
New York City Council Committee on General Welfare
December 3, 2025

Good morning, Chair Ayala, and members of the Committee on General Welfare. My name is Molly Zeif, and I am the Housing Navigator at Sanctuary for Families. We are so grateful for the opportunity to testify at today's hearing on the CityFHEPS Program.

Sanctuary serves over 9,000 abuse survivors and their children annually, the vast majority of whom are low-income families of color. Our domestic violence shelters provide safe, confidential residence for 400 adults and children each year. My program, the Continuum of Care, assists survivors on the path to stability with rental assistance for 6-24 months. Sanctuary also offers legal services, case management, and career training to support survivors facing housing insecurity and homelessness.

We are gravely concerned about the systemic, very long delays in FHEPS and CityFHEPS voucher processing for our clients. We know that the Council shares many of these concerns and greatly appreciate your sustained efforts to address this issue.

Sanctuary's housing specialists, case managers, and counselors work intensively to identify and secure affordable permanent housing for survivors. After the complicated process of getting a housing voucher approved, survivors struggle to find apartments and landlords willing to take vouchers. Unfortunately, the voucher processing time often then takes **another two to six months**, which frequently results in clients losing apartments. Not only does this impact these survivors' stability; it also damages Sanctuary's relationships with landlords and brokers.

A few examples of our clients' recent experiences with FHEPS are:

• Carolina was approved for a FHEPS voucher one year after her initial application. There were complications with her lease and each time it took at least 1 month to get a response to our inquiries. Due to these delays, an eviction case was started against Carolina, and it was only thanks to Sanctuary's housing attorneys that she was not evicted.

- Sasha was discharged from Sanctuary's transitional shelter into permanent housing with her FHEPS voucher in February 2025. Four months later, she contacted us after receiving a rent arrears notice from her landlord. It took Sanctuary escalating the issue up the chain of command to discover that it was an HRA system error.
- Carmen moved out of our transitional shelter in 2024 with an FHEPS voucher, which paid for three months, then stopped payments. Carmen was threatened by her landlord to pay a balance of \$11,000. She waited months to find a solution and during this time, she experienced intense stress.
- Isabelle moved out of shelter in 2023. After initial payments, CityFHEPS stopped paying
  her rent, leaving Isabelle with \$4,500 in arrears. Isabelle provided documentation to
  Homebase and HRA, who could not find her in their system. This situation is still ongoing

   despite Isabelle reapplying and receiving an approval letter, she is still not receiving
  rental payments.

Delayed voucher payments **compound stress and trauma** for survivors who are doing their best to recover from abuse and adjust to new lives in the community. Though our clients are not responsible for the late or missed FHEPS payments, they bear the stress and potentially dire consequences.

FHEPS and CityFHEPS are vital programs that make a positive impact on our city. We want these programs to succeed. We appreciate the Council holding this hearing and introducing the bills today to work to address these issues. However, we believe these delays are primarily the result of understaffing at the HRA and respectfully recommend that the City Council also advocate for increased HRA funding to fill vacant staff positions, which will shorten voucher processing times.

We applaud the oversight efforts of the General Welfare Committee. Thank you for your unwavering commitment to New Yorkers in need.





#### Joint Testimony of

#### The Legal Aid Society and the Coalition for the Homeless

before the

New York City Council Committee on General Welfare Regarding Oversight of the CityFHEPS Program.

December 3, 2025

The Legal Aid Society ("LAS") and Coalition for the Homeless ("CFTH") welcome this opportunity to testify before the New York City Council's Committee on General Welfare hearing on oversight of the CityFHEPS Program.

We commend the CityFHEPS program's intention to support vulnerable households. However, the reality is that this program has not lived up to its potential. Despite its well-meaning goals, the program is hindered by numerous challenges, including significant delays, administrative inefficiencies, limited support services, and inadequate rental assistance limits. As a result, many households who qualify for assistance under the program are still unable to access the support they need, putting them at continued risk of housing instability. It is critical that we increase funding and remove the barriers preventing people from benefiting fully from the program. The October 2024 Office of the New York State Comptroller audit of CityFHEPS chronicles these shortcomings. To little surprise, the report cites numerous concerns about the program's efficiency, its ability to meet the needs of vulnerable populations, and its overall effectiveness in addressing homelessness and housing insecurity in New York City. The report highlights the lack of comprehensive support services, oversight and accountability issues, inadequate communication, failure to serve all eligible households, delays in processing applications and inadequate rental assistance.

<sup>1</sup> New York City Department of Social Services: Administration of the CityFHEPS Program for Department of Homeless Services Shelter Residents https://www.osc.ny.gov/files/state-agencies/audits/pdf/sga-2025-23n1.pdf

#### **CityFHEPS FUNDING**

Implement the 2023 CityFHEPS Reforms and Expansion Laws: The City Council passed critical legislation over Mayor Adams' veto. This legislation expands CityFHEPS to households in the community, as well as increasing the income limit for homeless households. Mayor Adams refused to implement it, and the Legal Aid Society and the City Council brought suit. The City appealed that decision, and as a result, many New Yorkers sleeping in shelters or facing eviction have been denied access to the CityFHEPS program. The new administration must follow through on its commitment to end the litigation and expand CityFHEPS, and increase agency resources in order to successfully implement the expansion.

Low Rent Limits: The rental assistance caps set under the CityFHEPS program are often lower than the actual market rents in high-cost neighborhoods. As a result, eligible households may find it difficult to secure housing that fits within the program's limits, which leaves them without the support they need to avoid homelessness or eviction. To better align the program with current market realities, the rental assistance caps should be increased to reflect the actual cost of housing in high-demand areas. This would allow households to secure housing that meets their needs without being forced into inadequate or unaffordable housing options. In addition, this will combat the concentration of poverty seen with voucher usage and further the City's professed goal of affirmatively furthering fair housing.

#### **HUMAN RESOURCES**

Hire More Staff to Administer the CityFHEPS Subsidy: Staffing shortages in the Rental Assistance Program ("RAP") unit which oversees the administration of ongoing CityFHEPS subsidies negatively impact client experience. Households that are applying for, renewing or attempting to modify their CityFHEPS subsidies regularly report delays, mistakes and poor communication when dealing with RAP staff. CityFHEPS participants can no longer reach RAP staff directly by phone. The Human Resources Administration ("HRA") should appropriate the necessary funding to ensure sufficient staff to meet its obligations to timely and accurately process applications, renewals and modifications of CityFHEPS subsidies.

Train Staff at HRA Benefits Access Centers and DHS Shelters on the CityFHEPS Program: Staff throughout the Department of Social Services, including those at Benefits Access Centers and Department of Homeless Services ("DHS") shelters, must understand the CityFHEPS program and be able to identify and troubleshoot client issues. LAS and CFTH clients regularly report receiving misinformation from HRA staff who do not understand the CityFHEPS subsidy and erroneously divert them to HomeBase.

One of the major sources of frustration in housing voucher programs is poor communication. People sleeping in shelters must rely on shelter staff to apply for CityFHEPS and understand the status of their application and next steps. Due to poor training and high turnover, staff are often uninformed about the basics of the program. In addition, many shelters do not have sufficient staff to provide case management or housing specialist support. The most frequent complaints from shelter residents received by the Coalition for the Home less's Shelter Monitor Hotline are "lack of assistance in finding housing," "lack of case management," and "voucher issues."

Training staff to engage effectively with applicants, landlords, and other stakeholders—while providing clear, timely, and empathetic communication—can make a big difference. Properly trained staff are more likely to resolve issues efficiently, answer questions accurately, and provide guidance that helps all parties navigate the system.

CityFHEPS subsidy users should also be able to speak to someone at any HRA location or any DHS shelter who understands the subsidy program and can provide assistance when there is a problem. Well-trained staff can reduce delays, improve communication, encourage landlord participation, minimize administrative errors, ensure legal compliance, and empower tenants. Moreover, training contributes to program integrity, enhancing public trust and making the voucher system a more effective tool for providing affordable housing to those in need. Proper training also ensures that staff can handle complex situations, stay adaptable to changing circumstances, and keep the program running smoothly over time. Staff trained in cultural competency, anti-discrimination policies, and fair housing laws will be better prepared to handle the diverse needs of both tenants and landlords. This ensures that the program is accessible to all eligible individuals and that landlords are properly educated on the legal requirements of accepting rental vouchers.

HomeBase: Clients in the community at risk of entering shelter have to connect with their nearest Homebase provider in order to apply for CityFHEPS. Staffing at Homebase sites is inadequate to meet the need, requiring providers to make difficult prioritizing decisions that determine whether a family gets a same day intake appointment or one that will be weeks or months out. Wait times for appointments have recently ranged between two and six months. Increased funding can be used to hire additional personnel, including caseworkers, administrative support staff, and processing specialists at the agency as well as the Homebase providers. This will reduce delays in processing applications, conducting inspections, and issuing vouchers. More staff means a better ability to handle the workload and address backlogs, which improves overall efficiency. With increased funding, more case managers can be hired to work directly with tenants throughout the application process, helping them secure housing and ensuring they don't miss out on opportunities due to administrative challenges.

Communication between HRA and Homebase providers must also be improved. More often than not, The Legal Aid Society must intervene on behalf of clients who are working with Homebase to have an application for CityFHEPS processed to bridge the gap between the Homebase provider and HRA. A third party should not be required to connect HRA with its own contractors, and HRA must provide clear and timely responses to Homebase staff so that applications can be processed quickly and accurately.

Handling Property Inspections Efficiently: Inspections are often a barrier for landlords, so funding could support the hiring of additional inspectors or invest in technologies that streamline the inspection process, reducing the burden on landlords and speeding up approvals.

Centralized Management: Another contributing factor to the failures of CityFHEPS is the lack of effective oversight and monitoring mechanisms. To ensure that the CityFHEPS program fulfills its mission of preventing homelessness and providing stable housing for vulnerable New Yorkers, we strongly urge the City to allocate additional funding to address critical systemic issues. A key factor in the program's current shortcomings is the lack of effective oversight and monitoring mechanisms. Without adequate tracking and evaluation of the program's performance, it is difficult to identify and address issues in a timely manner, which in turn hinders the program's ability to serve eligible households effectively. Funding should be directed toward enhancing oversight capabilities, including improved tracking of outcomes, regular evaluations, and the ability to take corrective action when necessary.

#### COMMUNICATION AND OUTREACH

**Program Notices:** Notices approving an initial CityFHEPS application, a renewal or a request for a modification of the subsidy based on a change in rent, household size or income must clearly state the total rent, the amount to be paid through the subsidy, and the amount to be paid by the household. Participants and landlords should be able to generate these notices at-will on Access HRA or by visiting any HRA center much like they are able to obtain a budget letter for ongoing cash assistance and SNAP benefits.

Call Centers and Help Desks: With more funding, the HRA can establish or expand dedicated help desks or call centers that provide tenants and landlords with timely, clear information about their application status or program updates. Social media forums for voucher program participants are awash with people who are unaware of their rights, obligations and the next steps in their process. Providing accessible customer service staffed with trained, motivated and dedicated staff would reduce confusion and increase trust in the CityFHEPS program. Further, trained staff are better equipped to help tenants navigate challenges such as discrimination, confusion about the voucher

process, or difficulties in securing housing. Empowered and informed staff can directly address these issues, ensuring that tenants have the support they need to succeed in using their vouchers.

**Public Awareness Campaigns**: Increased funding could be used to conduct outreach and education campaigns to better inform tenants and landlords about how the voucher program works. Educating landlords about the benefits of participation, as well as providing guidance to voucher holders on how to apply for and use the vouchers, could reduce misunderstandings and encourage participation.

Underfunding of Support Services: Enhanced support services, such as case management housing placement assistance and follow-up services, are crucial for ensuring that households do not just receive financial aid, but also receive the ongoing support needed to maintain stable and safe housing and achieve long-term success. Without sufficient funding for critical supportive services, households will struggle to maintain long-term housing stability, reducing the effectiveness of the program. Furthermore, case managers, especially in shelter, must receive adequate training in public benefits since a lack of knowledge can impact a client's ability to access CityFHEPS.

Landlord Education and Outreach: Funding can support training for staff members who work directly with landlords. Well-trained staff will be able to effectively explain the benefits of participating in the voucher program and address concerns that landlords may have. Training on these laws ensures that staff members are fully aware of their legal responsibilities and can better enforce these protections. Funding could also support programs that educate landlords about their legal obligations and the benefits of participating in the voucher program, helping to overcome reluctance caused by inefficiencies or misconceptions. This could include workshops, informational materials, and targeted outreach to property managers and rental owners.

#### TECHNOLOGICAL IMPROVEMENT AND PERFORMANCE TRACKING:

**Upgrading IT Infrastructure**: Funding can be directed toward improving the digital infrastructure, such as creating user-friendly online portals for both tenants and landlords similar to the Housing Choice Voucher Program administered by the New York City Housing Authority ("NYCHA"). Funding can be allocated to invest in tools that automate various processes like application submission, document verification, and payment tracking. This would facilitate quicker application submission, document uploads, and communication between all parties. This can help reduce human error and speed up processing, which would reduce the incidents of missed housing opportunities.

**Automation and Digitization**: Invest in technology solutions that can automate parts of the process, like application submission, eligibility verification, and communications. A more streamlined digital process could reduce paperwork and delays. Automation and digitization would improve services and client experience across all of the public benefits that HRA administers. Applicants for Cash Assistance, SNAP and rental arrears routinely report that documents submitted to HRA, whether via

the Access HRA app or in person at the BAC, are not timely processed and assigned to their cases. Sometimes, the app will show that a document has been received but will fail to inform the applicant that the document was found illegible or otherwise lacking. Clients might find that their application submitted via Access HRA was rejected and not even learn the reason unless they visit a BAC and ask the right staff person. HRA should endeavor to automate and digitize the processing of documents while also ensuring that staff are trained to provide a high level of customer service.

Integrate the CityFHEPS Subsidy into the Network of Benefits Administered by HRA: HRA uses separate computer systems for ongoing Cash Assistance/SNAP benefits and ongoing CityFHEPS subsidy payments. It is not uncommon for an individual who receives both Cash Assistance and a subsidy to have two different case numbers. Likewise changes in rental amounts may be recorded during a recertification for ongoing cash assistance, but that information is not reflected on the CityFHEPS subsidy. HRA must take steps to better integrate these systems so clients only need to provide HRA information once and via one portal to make changes to their Cash Assistance, SNAP and CityFHEPS cases. Clients should not have to visit multiple HRA offices or make duplicative requests to correct their CityFHEPS subsidy and their ongoing cash assistance cases.

**Tracking and Accountability**: Regularly track the performance of the program through data on application processing times, landlord participation, and tenant satisfaction. Use this data to continuously improve the process and hold responsible parties accountable.

**Feedback Loops**: Engage with participants (both tenants and landlords) to gather feedback about their experiences with the program. This can help identify ongoing pain points and areas for improvement.

#### **LEGAL SERVICES**

**Tenant Support Programs**: More funding can go toward tenant advocacy and legal assistance programs to help individuals navigate the voucher process. These programs can assist with disputes, prevent discrimination by landlords, and ensure that tenants understand their rights, particularly in overcoming delays or unfair denials.

**Source-of-Income Discrimination Enforcement:** Despite clear prohibitions against voucher discrimination under both the City and State Human Rights Laws, source-of-income discrimination remains widespread. The pledge of a "coordinated enforcement and outreach effort" to combat source-of-income discrimination from the Mayor's June 2022 housing plan has yet to materialize.<sup>2</sup>

<sup>&</sup>lt;sup>2</sup> Housing Our Neighbors: A Blueprint for Housing and Homelessness <a href="https://www.nyc.gov/assets/home/downloads/pdf/office-of-the-mayor/2022/Housing-Blueprint.pdf">https://www.nyc.gov/assets/home/downloads/pdf/office-of-the-mayor/2022/Housing-Blueprint.pdf</a>

Correspondingly, in March 2023, the City announced that HPD would allocate funds to external organizations that would target housing providers who violate the law. It is unclear why HPD, instead of the New York City Commission on Human Rights ("CCHR"), was chosen to administer the funds. More importantly, these funds have not been distributed.<sup>3</sup> The lack of clear execution and the failure to distribute promised funds reflect a lack of urgency and effective action to combat source-of-income discrimination, leaving vulnerable populations without the support they need. CCHR's source-of-income discrimination unit must be funded to allow it to prosecute discriminatory activity as well as to engage in early interventions to ensure housing unstable and homeless New Yorkers can secure apartments.

#### PROPOSED LEGISLATION

<u>Int 1366-2025</u>: The proposed legislation requires the Department of Social Services to create web forms for all application forms. We support the goal of this legislation and urge the Department of Social Services to continue improvements to ACCESS HRA to ensure that participants may use it to effectively manage their benefits.

<u>Int 1430-2025</u>: The proposed legislation requires the Department of Social Services to provide a benefits interview confirmation notice. We support this legislation. The interview is a crucial step in the application and recertification process and clear confirmation that this step was completed helps to eliminate the risk of erroneous denial or case closure.

Int 1458-2025: The proposed legislation would establish a procedure for determining that a dwelling unit is habitable for the purposes of the CityFHEPS program. We support all efforts to speed the process for people to get access to CityFHEPS vouchers. However, both LAS and CFTH regularly hear from clients with CityFHEPS vouchers who are living in apartments with significant habitability conditions. Allowing owners to self-certify repairs creates the opportunity for abuse. In addition, DSS should not be allowed to determine which conditions issues are categorized as "minor" without oversight and approval.

<u>Int 1459-2025</u>: The proposed legislation would require reporting of lease-up times for housing vouchers. We support this legislation, though we strongly suggest granular reporting on the average time for each stage in the application process. Many delays in the process are due to the failure of shelter staff to take necessary steps to move an application forward. Reporting must include oversight of those steps, not only the stage of review by DSS. As noted above, more needs to be done to regularly track the performance of the program, and DSS should use the data to inform process improvements.

 $<sup>{\</sup>footnotesize \begin{array}{c} 3 \\ \underline{\text{https://gothamist.com/news/after-touting-} 3m\text{-}housing-} \\ \text{discrimination-crackdown-nyc-has-yet-to-issue-the-funds} \\ \end{array}}$ 

Int 1477-2025: The proposed legislation would require DSS to respond to an application for CityFHEPS rental assistance voucher within 15 days after receiving the application. The response would inform the applicant of whether the application has been approved, denied, or requires correction or additional information. We support this legislation. The agency must be held to strict processing deadlines for subsidy applications. However, the agency also needs sufficient staffing resources to meet this requirement.

#### **Conclusion**

We thank the General Welfare Committee for the opportunity to testify about the City's spending priorities with respect to rental assistance, and public benefits generally, and commend the Council for its dedication to addressing New York City's housing and homelessness crisis.

#### **About The Legal Aid Society**

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

The Legal Aid Society has performed this role in City, State, and federal courts since 1876. It does so by capitalizing on the diverse expertise, experience, and capabilities of more than 2,400 attorneys, social workers, paralegals, and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in New York City, LAS provides comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel.

LAS's legal program operates three major practices — Civil, Criminal, and Juvenile Rights — and receives volunteer help from law firms, corporate law departments and expert consultants that is coordinated by LAS's Pro Bono program. With its annual caseload of more than 200,000 legal matters, The Legal Aid Society takes on more cases for more clients than any other legal services organization in the United States. And it brings a depth and breadth of perspective that is unmatched in the legal profession.

The Legal Aid Society'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 more than 200,000 individual cases and legal matters,

LAS's law reform representation for clients benefits more than 1.7 million low-income families and individuals in New York City and the landmark rulings in many of these cases have a State-wide and national impact.

The Legal Aid Society is uniquely positioned to speak on issues of law and policy as they relate to homeless New Yorkers and the administration of public benefits. The Legal Aid Society is counsel to the Coalition for the Homeless and for homeless women and men in the *Callahan* and *Eldredge* cases. The Legal Aid Society is also counsel in the *McCain/Boston* litigation in which a final judgment requires the provision of lawful shelter to homeless families. LAS, in collaboration with Hughes Hubbard Reed LLP settled *Toliver v. New York City Department of Social Services* on behalf of current and past recipients of CityFHEPS and FHEPS rental subsidies.

#### **About Coalition for the Homeless**

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

The Coalition operates 12 direct-services programs that offer vital services to homeless, at-risk, and low-income New Yorkers. These programs also demonstrate effective, long-term, scalable solutions and include: permanent housing for formerly homeless families and individuals living with HIV/AIDS; job-training for homeless and low-income women; and permanent housing for formerly homeless families and individuals. Our summer sleep-away camp and after-school program help hundreds of homeless children each year. The Coalition's mobile soup kitchen, which usually distributes 800 to 1,000 nutritious hot meals each night to homeless and hungry New Yorkers on the streets of Manhattan and the Bronx, had to increase our meal production and distribution by as much as 40 percent and to distribute PPE and emergency supplies during the COVID-19 pandemic. But growing food insecurity, increased homelessness, and the arrival of thousands of people in desperate need have greatly increased demand for emergency meals and resources provided by this program. Finally, our Crisis Services Department assists more than 1,000 homeless and at-risk households each month with eviction prevention, individual advocacy, referrals for shelter and emergency food programs, and assistance with public benefits as well as basic necessities such as diapers, formula, work uniforms, and money for medications and groceries. Since the pandemic, we have been operating a special Crisis Hotline (1-888-358-2384) for homeless individuals who need immediate help finding shelter or meeting other critical needs.

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



## WRITTEN TESTIMONY SUBMITTED TO THE NYC COUNCIL COMMITTEE ON GENERAL WELFARE OVERSIGHT HEARING ON CITYFHEPS PROGRAM ON DECEMBER 3<sup>RD</sup>, 2025

**Introduction and Thanks:** My name is Eric Lee, and I am the Director of Public Policy for Volunteers of America- Greater New York (VOA-GNY). We are a local affiliate of the national organization, Volunteers of America, Inc (VOA). I would like to thank Deputy Speaker Ayala and members of the General Welfare Committee for the opportunity to submit written testimony.

**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 of permanent supportive housing, affordable and senior housing properties—with more in the pipeline.

#### **Background:**

VOA-GNY has been providing shelter services to homeless families since 1991 when DHS first began contracting with nonprofits to do so. We operate five transitional housing programs for families in the New York metropolitan area which serve more than 430 families, three "emergency" shelters designed for newly arrived families seeking asylum, also under contract with DHS, serving an additional 244 families, 7 HRA domestic violence shelter programs serving families and individuals fleeing domestic violence, two single adult women's and one single adult men's DHS shelters which combined have a capacity to serve 552 individuals, and a DHS Street to Home Pilot program which places individuals experiencing unsheltered street homelessness directly into supportive housing within 1 to 2 weeks of first meeting them.

#### Implementing Local Laws to Improve CityFHEPS

DHS' CityFHEPS rental assistance voucher is the primary tool New York City has for moving people experiencing homelessness into permanent housing. Through key investments and process improvements, even more households will be able to attain and stabilize their

permanent housing throughout the City. VOA-GNY is extremely heartened by Mayor-Elect Mamdani's vow to fully implement Local Laws 99-102 of 2023, which the City Council courageously passed, overcame a veto and sued to enact to expand meaningful access to CityFHEPS rental assistance to help more New Yorkers. As the transition of the incoming administration approaches, it is important to take stock of current efforts as well as opportunities for additional advancements in shortening housing instability and reducing the experience of homelessness for all New Yorkers.

VOA-GNY is extremely grateful for the Council's stalwart leadership and attention on behalf of New Yorkers who need housing assistance, and we applaud Speaker Adams, Deputy Speaker Ayala, and the entire Council voting to override the Mayor's veto of Int. 1372, to limit the rental contribution of tenants receiving rental assistance to 30% of their income. Through this bold move, the Council will help ensure that thousands of CityFHEPS households are not unduly rent-burdened and at risk of falling into arrears and housing instability.

#### New York State must also take decisive action

We recognize the increasing cost to the City to keep New Yorkers stably housed, and VOA-GNY urges New York State to expand funding to \$250 million in next year's budget for the Housing Assistance Voucher Program (HAVP) to help meet the growing need both in the city and statewide.

#### Continuing Collaboration between the City and Homeless Service Providers

VOA-GNY appreciates **DHS'** collaborative efforts creating a **CityFHEPS Workgroup** with key staff from shelter providers like VOA-GNY. Our **AVP of Family Shelters, Leslie Armstrong and Sector Director of Family Shelters, La'Tanya Johnson, help** inform the efforts of this critical workgroup which is focused on **streamlining how forms and processes interact to reduce bottlenecks** which will enable households to more quickly move from shelter to permanent housing. Together, DHS and providers are developing a more systematic way of communicating processes to all providers, and creating a guide for homeless services staff to use as a one stop shot for training, and obtaining information and updates on subsidies, forms, and submission. While this work is critically important, there are still structural barriers that must be addressed, and we thank the Council for working through these issues.

#### **Legislation Heard:**

Int 1366: VOA-GNY supports this legislation which requires the city to allow applicants to electronically sign for benefits and services. Through implementing **electronic** signatures, the city can modernize its processes for safety net supports and services, saving time for applicants and reducing paperwork for city workers.

Int 1430: VOA-GNY supports this legislation which would provide applicants with a receipt of their public benefits interview. This **confirmation of the interview will help** our clients and tenants have official documentation to **successfully challenge erroneous benefits denials** for failure to complete an HRA interview.

Int 1458: VOA-GNY supports the goals of this bill, to create a more efficient process to verify habitability standards and resolve concerns for potential housing opportunities through CityFHEPS. Defining the habitability assessment as an "inspection" and the people doing them as "inspectors" may necessitate additional City funding to provide building code certification training for homeless shelter rehousing staff. It may be prudent in this fiscal climate to modify the bill to conform to current "assessment" language to avoid this added cost and licensing burden.

The bill does offer important **flexibility to address minor issues same-day** within a 30-minute period. This **would save time** for the voucher holder, shelter staff, and landlord. Currently, one minor issue could mean waiting days for DHS to reschedule an assessment. The ability for building owners to submit electronic proof of corrections of unsatisfactory conditions will further hasten the review and approval housing conditions.

Our staff support limiting the scope of re-inspections to only the flagged issues from the initial assessment, apart from new emergencies that raise severe concerns such as leaking pipes, gas smells, broken windows, etc. which are witnessed in subsequent assessments. This will help to minimize iterative repeated assessments, and ensure the initial assessment is as thorough as possible. Similarly, limiting the scope of reviews for resubmitted CityFHEPS packets to the requested corrections would help minimize iterative paperwork reviews which prolong processing times and potential loss of housing opportunities.

Greater overall collaboration between providers, DSS, and landlords for habitability assessments, in terms of process and standards for the assessment can further save time for voucher holders and ensure the unit passes the first time.

<u>Int 1459:</u> VOA-GNY supports the goal of this bill to track average lengths of time for rental assistance applications, and we recommend further disaggregation of the data by steps in the approval process and by different referral and eligibility mechanisms to ensure

reporting more closely reflects the experiences of applicants and helps outline potential bottlenecks and areas for additional process improvements and resourcing:

- 1) Total average length of time: from issuance of a shopping letter to move-in
  - a) Average length of time to identify housing: from issuance of a shopping letter to initial submission of a rental assistance packet to DHS/HRA
  - b) Average length of time for DHS/HRA to review/process: from initial submission of a packet to DHS/HRA to move-in date
  - c) Average length of time for HRA to issue checks: from packet approval date by HRA to move-in date
- 2) Disaggregating Reporting by different referral and eligibility mechanisms:
  - a) CityFHEPS
    - i) In-community To Move
    - ii) In-community To Stay
    - iii) Residing in DHS Programs
    - iv) Residing in HRA DV Shelters
    - v) Residing in DYCD RHY Programs
  - b) FHEPS
    - i) in-community To Move
    - ii) in-community To Stay
    - iii) Residing in HRA DV shelters

Int 1477: VOA-GNY supports the intent of this bill to shorten the processing time for rental assistance vouchers. To improve consistency of response times, we recommend changing the 15-day response time-limit to 10 business days. Establishing time limits for the DHS/HRA to respond to submitted rental assistance applications can help reduce the number of submitted packages which grow "stale", necessitating updated documentation, redrawn leases, and public assistance rebudgets.

#### Closing:

We are grateful for the opportunity to submit testimony and look forward to working with the Council and the Administration to continue to strengthen and improve CityFHEPS, a proven effective tool to prevent housing instability and address homelessness. Should you have any questions, please email me at <a href="mailto:elee@voa-gny.org">elee@voa-gny.org</a>.

Respectfully submitted by Eric Lee, Director of Public Policy, Volunteers of America-Greater New York.

# General Welfare Committee Oversight- CityFHEPS Program Testimony by Velvet A. Johnson-Ross December 4, 2025

Greeting to Chair Councilmember Diana I. Ayala, and members of the Committee on General Welfare, and fellow New Yorkers. My name is Velvet A. Johnson. I am a Member Leader of Neighbors Together, Founder of The Unlock Leadership Collective, and a member of Impacted Advocates, where we advise the administration on housing and homelessness. Before I became a Housing Justice Strategist and coalition leader, I was a Black woman who lived through the violence of eviction, homelessness, and bureaucratic neglect. I survived an illegal eviction in 2019, and I carry that trauma into every room where policy is debated.

I am here today to urge you to pass **Intros 1366, 1430, 1477, 1458, and 1459.** These bills are not abstract reforms. They are lifelines for New Yorkers too often treated as expendable.

#### **Intro 1366: Accessible Online Forms**

Right now, applying for help is a maze meant to wear people down. Paper forms, duplicative questions, and inaccessible systems force families to choose between survival and compliance. Intro 1366 would require DSS to provide easy-to-fill online forms. This is not a luxury—it is a necessity. For single, college-educated Black women like me, it means managing housing needs without being penalized for independence. For seniors, parents, and workers juggling multiple jobs, it means finally accessing the help they are owed.

#### **Intro 1430: Benefits Interview Confirmation**

Too many applicants miss interviews because they never receive confirmation. DSS must provide clear details of when, where, and how to connect. When the city fails to confirm interviews, it is not a mistake—it is a denial of survival. This bill ensures people are not punished for DSS's failures. It restores a measure of faith in a broken system.

#### **Intro 1477: 15-Day Response Requirement**

Time is not neutral when you face eviction or hunger. Each day without a reply is another day of fear. DSS must respond within 15 days, letting people know if they are approved, denied, or need adjustments. This timeline is not extreme-it is compassionate. I know what it means to wait endlessly for a system to decide if you deserve shelter. Waiting is a silent act of violence.

#### Intro 1458: Habitability Standards for CityFHEPS Apartments

Housing vouchers mean nothing if the apartments are unlivable. Intro 1458 requires landlords to inspect properties, report issues, and promptly fix them. Families are stuck in apartments with mold, leaks, and unsafe wiring. That is not housing-it is harmful. This bill ensures CityFHEPS clients do not have to sacrifice dignity for shelter. It holds landlords accountable and guarantees livable homes.

### Intro 1459: Reportings of the average time for CityFHEPS vouchers to access permanent housing

Passing this is urgent because without transparent timelines, the city can continue hiding inefficiencies that prolong suffering and real accountability. It will give families and advocates the data to confront systemic delays with measurable accountability. This is the only way to ensure vouchers actually become the fast, effective pathway out of homelessness they were meant to be.

Together, these bills create a foundation of respect, responsibility, and fairness. Housing is not just about a roof—it is about dignity, safety, and the systems that either protect us or abandon us.

I urge this committee to pass **Intros 1366, 1430, 1477, 1458, and 1459** without delay. Every day without these protections is another day where a mother waits for a letter that never comes, a family settles into unsafe housing, and someone like me relives the trauma of eviction.

Housing justice is not charity—it is a mandate. These bills are the beginning of that mandate.

Thank you.

Velvet A. Johnson Ross

#### City Council Committee on General Welfare Hearing 12/03/2025 CityFHEPS Intros 1458, 1459 and 1477 on 12/03/2025

Eustacia Smith,
Director of Advocacy, West Side Federation for Senior and Supportive Housing

Thank you to Chair Ayala, Councilmember Brewer and to the Committee on General Welfare for the opportunity to submit testimony. My name is Eustacia Smith and I am from West Side Federation for Senior and Supportive Housing or WSFSSH. WSFSSH develops and operates permanent supportive housing for older adults with 2,500 units of housing across 31 buildings and more in development. WSFSSH also operates a 92-bed shelter exclusively for older adults. Many of our residents come into housing through CityFHEPS and many of our shelter residents are placed in housing through CityFHEPS. CityFHEPS is an extremely valuable program and important part of the solution to getting homeless people housed.

Often, however, the process is far too slow and too bureaucratic. We have examples where the process has taken up to year or more to get someone into one of our vacant units. In the shelter, the process is stalled because the application is reviewed piecemill, getting kicked back for one issue at a time, and each time it causes another two week delay. There are too many people involved in reviewing it, who don't communicate with each other so that if corrections are needed, they can be sent back together at once. Because the majority of our residents are on SSI or SSD, they must go through a process referred to as "single issue" in order to get the first months rent or unit hold. This process is difficult, requiring the client to have to stand by for several hours for a phone call. Through experience we have learned that we have to give the client a script of exactly what to say so that the correct boxes get checked in order for the application to go through. The window of the "single issue" is very short. Too often we find that due to application packet review delays, by the time the packet is approved the single issue has expired. This process causes further delay.

In our permanent housing we have experienced long delays in the pre-clearance process because the city has rejected the package based on a small technical issue, causing a back and forth that has sometimes gone on for 4 to 6 months, even though the building has previously been through a preclearance on other applications. In one instance the package was rejected because when writing the name of the building we spelled out Housing Development Fund Company and they wanted us to write it as HDFC. In another instance it was because we referred to the unit as a Room rather than an SRO. At times it has taken months just to get an inspection scheduled. Sometimes the unit fails the inspection due to a minor issue, such as a missing outlet cover and the process gets repeated, all the while, leaving the applicant homeless.

At a time when we are seeing dramatic rises in homelessness, have a significant shortage of available units and are facing massive cuts federally, we need to do what we can to fix these problems and get people housed as quickly as possible. WSFSSH

is strongly in favor of Intros 1458; 1459 and 1477 sponsored by Council Member Brewer, that together would speed up the process and time that it can take from being homeless to being able to move into housing. Thank you to the committee for considering all of the avenues to streamline and improve the CityFHEPS process in order to get people out of shelters and into a permanent home.

#### NEWYORK CITY COUNIL

250 Broadway

New York NY, 10007

To our honorable council members,

My name is Nadira Pittman I have multiple complaints and concerns Regarding the city but this is to addressed DHS Department of Homeless services and human civil rights. Currently I am a resident at the wander Patterson women's shelter located in Far rockaway NY has many violations and concerns within the facility. On December 1.2025 @820 pm a male and his pet dog exited out the room two doors next to mines leading me to feel a little uncomfortable. I understand the right to exercise your gender identity but it is an unsafe environment for vulnerable women.

Although you may sign documentation inferencing that you are female and identify as such gender, if you still possess male organs imposturous encounters as an transgender individual is possible and therefore further consideration and information would need to take place and may only be considered LGTBQ Identifiable; "gay" or "lesbian" be in order until transition is fully complete. Due to the tremendous amount of sexual assaults against women in shelters and other facilities further understanding of one's sexual history and/or orientation shall influence further outcomes and not only because one reflects or feels emotionally like the opposed sex/ gender they were assigned at birth when entering a predominantly female/ male facility. I believe there has to be full evidence and relevancy equating to such outcomes. I would like to make it aware, that this is not based on an bias mindset but just an safety concerns.

Additionally, The Wander Patterson shelter seems to also similarities to Electronicly monitoring throughout the building ,myself and many of the other residents are dealing with tortuous yelling screaming name calling, coercion from the employees as well. this location deems unfit unsafe slowly secretly and silently extinguishing our civil constitutional rights.

Unfortunately many other women that reside here do not have a plan B on living arrangements therefore we stay in these conditions cringing in agony hoping we will have peace the following day. this illegal behavior i believe is motivation into human trafficking and mind control experimental means. I hope that this information reaches the right individuals that will no longer cover up these heinous conditions and these illegal actions be taken seriously in addressing and restoring our lives.

Our safety is your safety lets continue to strive to improve and protect human rights, not just for the wealthy but for all. Please reach me via email at Nadiraptt@gmail.com

Sincerely, Madirapittman

#### Committee on General Welfare Testimony By Paris Dickey December 3 2025

Good afternoon to the Chair of General Welfare, Council Member Diana I Ayala. My name is Paris Dickey, and I am a formerly homeless New Yorker who now serves as a licensed real estate salesperson dedicated to housing homeless families and individuals. I have also dedicated time to assist DSS in the past to lay the blueprint for streamlining the city FHEPS landlord Paperwork. In this role as a Realestate salesperson I regularly confront and report instances of voucher discrimination, gender discrimination, and HIV-status discrimination that my clients endure.

Today, I am here to testify about how inefficiencies within DSS and HRA not only obstruct my ability to secure housing for those in need, but also drive up costs and perpetuate the cycle of homelessness.

Recently, I did everything in my power to assist a family with special needs by holding (still showing to interested persons) a three-bedroom unit for over 45 days. This unit was directly across the street from the children's doctor and hospital. Despite the applicant having submitted a rebudgeting request to update their voucher two months before reaching out to me, the case remained unresolved. The landlord pulled the unit due to the length of time waiting for that family and another back up application reprocessing.

#### Right now, the system is failing.

CityFHEPS has **no standardized training manual**. Workers request random documents that are not required. Packages are kicked back for issues that should have been addressed before submission. This has delayed **over 25 placements**, many for **6–10 months**. Landlord paperwork was revised **four times in two months**, causing massive delays and lost units.

Shelters without caseworkers or those with **service issues** need direct access to the **Mayor's HOME/PEU Office** which has experience processing vouchers. This office needs to be utilized so voucher recipients with barriers to assistance can be processed without obstruction or bias.

I also hear disturbing reports of **sexual harassment in shelters**. I urge the Council to create a **dedicated NYPD unit** trained to investigate and take action. Homeless New Yorkers deserve safety. Homelessness is traumatic enough.

I support **Intro. 1366-2025** Web form application and urge the City to explore **blockchain technology** to reduce errors, waste, tampering and the aforementioned issues. Mayor Adams' **Executive Order 57** already gives the city the framework to do this.

I Support **Intro. 1477 -2025** which mandates DSS to respond to applications within 15 days, informing the applicant of the status of approval, denial, or need for corrections.

I also support **Intro. 1459-2025** which Requires DSS to report the average times it takes a City Fheps voucher holder to secure housing after receiving a housing voucher. These bills are absolutely imperative to transparency in this process of housing CityFHEPS recipients

Please Note: Under **NY Social Services Law § 21 (2024)**, OTDA has the authority to create or modify codes necessary to provide services and expedite. NYC DSS /HRA simply needs to request these actions.

Finally, brokers are not being paid. My brokerage alone is owed **over \$55,000**. I've trained agents on how to process vouchers. However,nonpayment has pushed agents away from working with voucher holders and shrinks housing options. This is one of many reasons ghosting and non assistance happens. I continue to house people in spite of nonpayment. So far this year I have linked well over 80 various voucher and subsidy recipients to housing and have another 50 applications to process for units being sought. Some I've done for free.

I'm asking this Council to fix the training gaps, modernize the system, hold agencies accountable, and protect the people in the advocate community that fight and serve our most vulnerable neighbors. Thank you for your time.

Dear City Council, the Committee on General Welfare, and Whomever is witnessing my written testimony,

My name is Riannon Grubbs, and I would like to testify in general for the improvement of the CityFHEPS program, as well as support the bills INT 1366, 1430, 1458, 1459, and 1477 brought up in this hearing.

I have been in the shelter system through PATH with my son Alexander, who turns two next week, and fiancé Gevonni, a native New Yorker from Queens, since February 18, 2025. We jumped through the hoops of clarifying our confusing housing history for four months just to be found eligible for shelter in May. Then we fought to get myself and our son put on Gevonni's SNAP case so we could move on to CityFHEPS. Then we got screwed over by the Jamaica HRA who won't grant a daycare voucher for Alexander so I can look for a job, because I have no other care option for the duration of appointments or interviews and have to care for him myself

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We had no luck with any apartment applications in our first shelter (although our case worker barely knew what she was doing, kept blaming us for being lazy, and we still don't know if that shelter even has a housing specialist), so the case manager transferred us to another shelter in Queens in August. We already had to renew the potential eligibility/shopping letter, and are about to have to renew again.

Now that we finally work with a housing specialist, we have turned in at least 30 market/private applications, 33 Housing Connect applications, and have gone to about 10 viewings since August. I add to the other testimonies heard regarding silos in the program, that we are also experiencing a 100% source of income discrimination issue. Time and again, we submit applications, pay application fees, give all these people our social security numbers and banking information, spend the money to transport to viewings, and get told the next day that the apartment isn't available anymore. They "gave it to someone else" when they clearly did not have other applicants that fast.

What really gets to me is that I was halfway through my internship, the last requirement for my Bachelor of Social Work at the University of Texas at Arlington, was in the Honors College, had elected to do master's level work for my policy and research methods classes, when, in order, I lost my financial backing for school, hours at my job, my car, my apartment, my therapist, my entire job, and found out I was pregnant and at rock bottom in Texas, in a span of 6 months. We tried to make it in hotels, tried to get hired while pregnant, and it wasn't happening. Then Gevonni's mother fell sick and died up here in May 2024 at only 46 years old. Her entire adult life was spent on social welfare benefits. We barely collected money as a family to cremate her, then while we were in NYC at her actual funeral, Gevonni got fired. We had no money and nowhere to go. Her apartment complex wouldn't let us take over her unit and wouldn't sign us as new tenants. So we crashed with friends, trying to save up for any other option. But then they moved to Connecticut, and we couldn't take over their lease either, because their landlord was

not a real landlord so he wouldn't take HRA assistance. Then, February 18th, we were dropped off at PATH.

So, how did I go to college for social work for four years, and have as much knowledge and experience as unlicensed case workers on the job without a bachelor's degree, and I can't seem to get out of the shelter system? We all heard the others testifying about multi-year waits, but I have a kid, and I remind whomever reads this that these rooms and the dealings of growing up in a shelter, are not meant to foster proper physical, social, emotional, any sort of development of young children for more than a few weeks. My current shelter doesn't have a care program for my son's age, and I pray to God we aren't still trying to claw out of here by the time he's eligible for the in-house 3K here. We were told it wouldn't take longer than a year when we entered; it's almost been a year. We were told directors wanted us out in six months, for their data; it took six months to even get a voucher.

My son is missing out on time he could have spent learning with teachers and playing with other children. I'm missing out on being available to search for a job related to my education and experience because I have to be available for shelter-related appointments, room inspections, and curfew times. All while we've constantly been discriminated against. People see Gevonni's tattoos and say he's a dangerous guy; they see he's not white; they treat us like we're stupid upon sight; the leasing agents know how much he makes as a tattoo artist licensed for NY, and he can pay our share of the rent; but that doesn't matter. They see that it's a CityFHEPS voucher, take the fees, and run.

I did watch this committee hearing and the related oversight hearing from January, and I gather outgoing Councilmember Ayala and the rest of the Committee on General Welfare have worked incredibly hard to make this program work. I just need the City Council to hear our story. To think about the children in these shelters. To imagine a one year old kid that didn't get to use a high chair and had to eat from his stroller three times a day, getting pneumonia and throwing up every other week from communal eating conditions and poor cleaning, or the numerous newborns at Archer Pride whose mothers don't get a fridge for breast milk and might get half a day's worth of diapers for a week, because we are stuck and have no other option but the street, and that's off the table. I would fully, utterly rather be employed by the city right now, whether in a different shelter, or juvenile correction facility, a school, a mental health facility, or canvassing the subways, than sleep behind a razor wire fence again. I just want to earn the \$3K to get my transcript unlocked so I can finish my social work degree in 1-2 semesters, so I can be the one making sure clients understand the system they've fallen into, the paperwork, requirements, their rights and options. I should be at the desk helping get these people out of the system and streets. But I'm stuck waiting for landlords to stop lying to us, not knowing how to prove we've experienced the discrimination to report these people. Waiting to hear how these payroll people are going to catch up and consistently pay these landlords so they'll trust the CityFHEPS vouchers and take on tenants, fill their vacancies, and stop letting clients rot and lose their vouchers, apartments, and lives because of delays. But I also, ultimately, want to get out of this room, to stop paying for a storage unit for 3 people's stuff that fit in a second normal apartment room, to have a real life, to have a real job, and to make a real difference in this city.

Last point, I tried to look up how to get a job working on CityFHEPS cases. The only available jobs mentioning housing vouchers are several about processing Section 8, which you can only get through a referral right now. So that brings up these questions: why are these CityFHEPS processors so spread out, according to the women questioned at the January oversight hearing, instead of unified for better communication flows and process supervision? Why are there no job listings mentioning this program? Why are we experiencing the same exact issues nearly a year since the last oversight hearing? Are the processors for applications and payments just bad at their jobs, overwhelmed by caseloads, is the portal system not working well, or are their bosses underfunded for hiring enough people or replacing underperformers with better candidates to sufficiently process these applications and payments?

Thank you for your time hearing out the concerns of the people you are trying to help. And thank you for voting to override the mayor's vetoes on CityFHEPS bills, and all the work you do. Please work to fix the housing crisis and voucher system over this next administration so we can finally heal and contribute to society.

#### Alexis Foote

Jamaica, NY 11434

December 5, 2025

Committee On General Welfare Diana Ayala (Chair), Kevin C. Riley, Althea Stevens, Sandra Ung, Tiffany Cabán, Lincoln Restler, Chi Ossé, Alexa Avilés and, Chris Banks 250 Broadway 8<sup>th</sup> Floor Room 1 New York, New York 10007

Dear Committee on General Welfare,

Diana I. Ayala, I would like to thank you for your amazing leadership as the Chair of the Committee on General Welfare and a fierce fighter for safety and affordability for all New Yorkers. Thank you for supporting COPA and TOPA. New York City is profitting off of generational poverty, generational trauma and generational imprisonment of young people. We need Reparation when it comes to housing, food justice and environmental justice. This is why I Alexis Kimberly Smallwood-Foote support T2025-4337 Oversight for the CityFHEPS program.

I am a domestic violence survivor due to my husband having serve mental illness and having falsly arrested by the NYPD from the 101 Police Pericent in Far Rockaway. He made fasle claims against my 19 son Alexander Jones-Baker and I last year. For the past 18 months I've been fight the system to get my children back and stable housing ,however due to my family's income I do not qualify for City FHEPS. This is why I support the following bills Int 1366-2025 this bill will improve not only the department of social services web forms for all application forms, the bill should also include upgrades to the equipment used to upload forms. Int 1430-2025 should also state that case managers from DSS need to leave their phone numbers for clients to return their phone calls. DSS calls from unknown numbers and than they blame the clients for missing appointment phone calls. Int 1458-2025 in relation to the procedure for determining that a dwelling unit is habitable for the purposes of the CityFHEPS program. This bills need to express the need to hire over 50 housing inspectors for the City Of New York. New York City needs to unfreeze the hiring freeze that was created by Mayor Eric Adams.

Int 1459-2025 in relation to requiring reporting of lease-up times for housing vouchers. We also need homebase programs to be audited for abuse of clients and employees. My family

and others have been waiting to be service by Catholic Charities for three years now. They are over worked and underpaid. Camba claims that they can't help residents in Far Rockaway with housing because they don't do housing court in Queens. All of these CBO are over worked and underpaid.

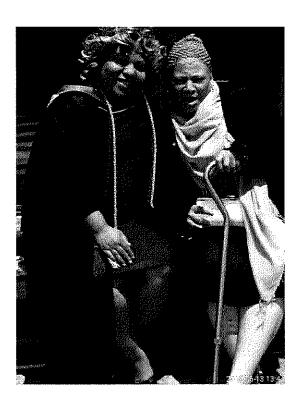
Int 1477-2025 A Local Law to amend the administrative code of the city of New York, in relation to CityFHEPS application response times. I have been told that I can not get City FHEPS because my family's income is over the proverty line. My first housing specialist Ms. Williams who works for Acaica which runs the JFK Gates for DHS, told me that I was ineligible for HPD 8-Section eventhough I am a DVS. City FHEPS needs to change the income guidleines and expand the City FHEPS to the following groups; LGBTQ youth, young people in foster care, individuals with major mental illness. City FHEPS need to have features simialr to section -8.

All of the Housing courts in all five boroughs, family court and crimianls also play a major role in homelessness due to the lack of blockchain technology. These systems do not communicate with each when it comes to families who are facing homelessness and mental illness. For the past two years I've had to be my own family advocate and paralegal when it came to advocating for my right as a parent and law abide citizens. Homebase needs to have a audit, people need to be fired because they are ruining people lives with their complacency. All of the HRA office in Housing Court also need to be fully staffed.

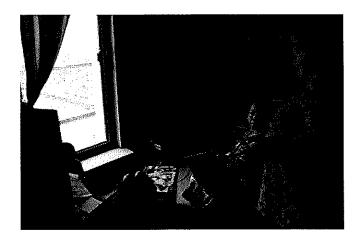
Council Members Banks and Council Member Stevens, I grew up in the foster care system in New York City from the time I was born until my adopted mother kicked me out of the house at the age of 17 years old. Catholic Charities aka Catholic Home Bureau. Our generation Reparation and we need to make sure that next the Governor make that happen. The real elephant in the room is the Governor. Accordding to different soruces; the governor's significant role in New York City housing starts with legislation, major financial investments, and state-level policy initiatives aimed at increasing supply, promoting affordability, and protecting tenants and homeowners statewide. New York City killed my matriarch by not meeting her and my needs. DHS, HPD and DSS please do not kill me or leave my family and I in the shelter for years on end. I am a mom of three, a business owner, wife, CLT practitoner and college educated. I living in the most wealthiest City in the world. There should be on reason why families are experinecing generational homelessness and depression. Thank you for your support and time in this important matter.

















Date: December 1, 2025

To: Whom it may concern: RE: Alexis Kimberly Foote

CID: 23701994

This document verifies that (Alexis K	imberly Foote) is temporarily residing at our
homeless shelter facility Brewer Stal	pilization, located at
Jamaica, NY 11434 I	since, 10/31/2025. THIS IS A NON
COOKING FACILITY.	

Family Composition: 1 Adults/1 Children- (Female)

First Last Name	DOB	Social Security	Age	Relationship
Alexis Kimberly Foote	11/13/1983		41	HOH/Female
Alexander Jones Baker	11/29/2005		19	Son/Male
Osiris Foote	07/05/2018		7	Son/Male
Darel Foote	04/26/2020		5	Daughter/Female

Thank you,

ANH Staff's Name: Nancy Gaskin Title: Case Manager

ANH Staff's Signature: Mancy Casher Contact #:

#### **Eligibility Requirements (General)**

Only the NYC Department of Social Services (DSS) can determine eligibility, but a household generally must meet all of the following:

Category	Requirement
Income Limit	Gross income must be at or below 200% of the Federal Poverty Level (FPL) during the first year of the program.
Cash Assistance	Must be receiving Cash Assistance (CA) benefits if eligible.
Other Benefits	Must <b>not</b> be eligible for any other state or federal rental assistance program (like Section 8 or FHEPS).
Immigration Status	At least one member of the household must have a <b>qualifying immigration status</b> (they do not have to be a U.S. Citizen, but must be lawfully present).
Source of Eligibility	Must meet one of the qualifying criteria related to housing instability, such as:

#### Qualifying Scenarios for Eligibility

- In-Shelter: Families in a Department of Homeless Services (DHS) shelter for the last 90 days (with no more than a 10-day gap), or single adults in a shelter for 90 of the last 365 days.
- **Homeless Prevention:** Households referred by a City-contracted homelessness prevention program (like **Homebase**) if DSS determines the voucher is necessary to avoid entering a shelter.
- Vulnerable Populations: Households that include someone who:
  - o Served in the U.S. Armed Forces and is at risk of homelessness.
  - o Has an active Adult Protective Services (APS) case.
- Current Housing: To help a household stay in a rent-controlled apartment.

#### 2. How the Subsidy Works

• Voucher Length: Up to five years (one initial year, followed by four annual renewals). Exceptions are made for households with members who are 60+ or receive federal disability benefits, who may qualify for longer extensions.

- Initial Payments: To help secure an apartment, the City provides a payment
  covering the first month's rent, plus an upfront rental supplement for three
  additional months of the voucher's share of the rent. A security voucher equal
  to one month's rent is also provided.
- Location: Vouchers can be used to rent an apartment anywhere in New York
   State

### 3. Maximum Rent Standards (Payment Standards)

The maximum rent the CityFHEPS program will cover is tied to the federal **Section 8 Fair Market Rent (FMR)** standards, which change periodically. These limits generally reflect the total rent (including utilities if they are part of the lease).

Example Maximum Monthly Rent (as of a recent update in 2025):

Household Size/Bedrooms	Maximum Rent (if utilities included)
SRO (Single Room Occupancy)	
Studio	\$\\$2,646\$
1 Bedroom	\$\\$2,762\$
2 Bedrooms	\$\\$3,058\$
3 Bedrooms	\$\\$3,811\$

Note: If utilities are not included in the rent, a standard utility allowance is deducted from the maximum rent to determine the maximum rent the landlord can charge.

#### 4. How to Apply

Households **do not apply directly** for the CityFHEPS voucher. Instead, they must be referred through an approved DSS program:

- For Households in Shelter: You must work with your case manager or housing specialist within the shelter system (DHS or HRA). They will assess your eligibility and provide the necessary "Shopping Letter" and "Household Share Letter."
- For Households At Risk of Homelessness: You must go to a DSS-contracted homelessness prevention center called Homebase. A caseworker there will assess your situation and may refer you for CityFHEPS if it's determined to be necessary to prevent shelter entry.

The best first step is to **contact your nearest Homebase office** if you are not currently in a shelter.

Would you like to find the location of a **Homebase** office near you, or do you have a specific question about the **landlord process**?

Next week the facility is having OTDA inspections, so please remember your units must be clutter-free of excessive items, there must be NO food in your unit, both beds must be separated, your floors must be free of items on the floor. Please note if you don't follow this notice, you will be given an violation notice, any food left out will be discarded, any excessive items will be taken and stored (you have 7 days to remove it from the facility) reminder if you if you receive multiple violation notices you will be removed from this facility.

DHS, while in shelter, your rights include
Rule 16. THE RIGHT TO BRING TWO BAGS OF
PERSONAL BELONGINGS TO THE SHELTER. (two per person)

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

Appearance Card
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I intend to appear and speak on Int. No Res. No
in favor in opposition
Date:
Name: Kezzie (PLEASE PRINT) Thomas
Address: Bx, Ny 1043
I represent: Family Action Board (FHC)
Address:
THE COUNCIL
THE CITY OF NEW YORK
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Appearance Card
I intend to appear and speak on Int. No Res. No
in favor in opposition
Date:
Name: Diana R (PLEASE PRINT)
Name: 219101005
Address:
1 represent: Safety Net Activist members
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: Calvin Michael
Address:
I represent: Safety Net Act vists.
Address:

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

Appearance Card
I intend to appear and speak on Int. No. 1366. Res. No in favor in opposition
Date:
Name: KATIE LIPTAK
Address:
I represent: ANTHOS HOME
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: Kober T Desir . Lepheral
Address: Legal Aid Society Weltare
I represent:
Address:
THE COINCIL
THE CITY OF NEW YORK
Appearance Card
I intend to appear and speak on Int. No Res. No
in favor in opposition
Date: 12/3/25
Name: Overlan Horn
Address: 100 Pecul St., 19 floor 10004
I represent: New York Legal Assistance Group
Address:
Please complete this card and return to the Sergeant-at-Arms

Appearance Card
I intend to appear and speak on Int. No Res. No
in favor in opposition
Date: 10/3/25
(PLEASE PRINT)
Name: MOlly Zeif
Address: 1238
1 represent: Sanctuary for families
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: 12/3/25
(PLEASE PRINT)
Name: Alison Wilkey
Address: 129 Fulton St
I represent: Coalition for the tionells
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: 12/3/2025
(PLEASE PRINT)
Name: ANTHONY D.
Address:
I represent: Voucher HOLDIPS / REALESTATE
represent: VOOCULA HOLDINGS / KEAL 857/17
Address:
Please complete this card and return to the Sergeant-at-Arms

THE CITT OF THE WITCH
Appearance Card
I intend to appear and speak on Int. No Res. No
in favor in opposition
Date:
Name: Alexandra Dougherty
Name: Hexandra Dougherty  Address: 177 Livingston Ct. 7th +1.
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represent:
Address:
Please complete this card and return to the Sergeant-at-Arms
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