



Human Resources  
Administration  
Department of  
Homeless Services

## **Testimony of Molly Wasow Park, Commissioner**

### **New York City Department of Social Services**

#### **Before the New York City Council, Committee on General Welfare Oversight Hearing Administration of CityFHEPS**

**January 27, 2025**

Good morning. I want to thank Deputy Speaker Ayala and the members of the Committee on General Welfare for holding today's hearing on the administration of CityFHEPS.

My Name is Molly Wasow Park, and I serve as Commissioner of the New York City Department of Social Services (DSS), which is comprised of the Human Resources Administration (HRA) and the Department of Homeless Services (DHS). I am joined today by Andrea Reid, Deputy Commissioner of Prevention and Housing Assistance at the Human Resources Administration, and Reesa Henderson, Chief of Placements at the Department of Homeless Services.

The City Fighting Homelessness and Eviction Prevention Supplement rental subsidy, better known as CityFHEPS, is a component of the larger DSS/HRA/DHS strategy of providing an integrated continuum of client services to create a path to sustainability for low-income New Yorkers. CityFHEPS is the largest municipally funded rental subsidy in the nation, and a vital tool in the agency's pursuit to promote housing stability for all New Yorkers.

#### **CityFHEPS for DHS Clients**

Rental assistance programs like CityFHEPS are an essential resource in assisting New Yorkers experiencing homelessness move out of shelter and into stable housing. Developing Independent Living Plans (ILPs) and a strategy to support that plan starts upon a client's entry into shelter. From the issuance of the CityFHEPS Shopping Letter, to the point of move-out from shelter, our dedicated DHS and provider staff are laser focused on connecting shelter clients to permanent housing. That process includes case management, connecting clients with the tools to obtain employment, the work of shelter housing specialists, the DHS apartment search team and the Public Engagement Unit to find apartment leads, and shelter housing specialists and DHS staff who collectively make sure subsidy packages are accurate and processed efficiently.

#### **CityFHEPS for Community Clients**

CityFHEPS also plays an integral role in keeping New Yorkers at risk of homelessness housed. For clients in community, HRA's Homebase program serves as a key pathway for access to CityFHEPS. HRA oversees 26 Homebase sites across the five boroughs. The Homebase program provides various homelessness prevention services and aftercare support services to families and individuals exiting shelter and transferring 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 and job placement assistance; and help relocating.

### **NYC's Investment in CityFHEPS Yields Record-Breaking Results**

The City's investment in the CityFHEPS rental subsidy, and overall focus on permanent housing placements has proven to be essential in stabilizing the lives of at-risk New Yorkers since the CityFHEPS launch in 2018. FY24 was a record-breaking year for placements from shelter to permanent housing. DSS connected more New Yorkers to subsidized permanent housing than any year in recent history. DSS/DHS helped more than 18,500 households move out of shelter and into stable homes – a 24 percent increase from the previous year. The majority of those households relied on CityFHEPS to move out of shelter. Nearly 14,000 households – a record number - leased apartments using CityFHEPS vouchers, reflecting a 42 percent increase compares to FY23.

These record-breaking outcomes were delivered to New Yorkers despite a historic low in the City's vacancy rate. The New York City vacancy rate of 1.4% is the lowest since 1968, and when we focus in on the vacancy rate for affordable rental units its is even lower. For households searching for units under \$1,100, the vacancy rate was 0.39%. Those vacancy rates have ongoing impacts on securing affordable housing. In the face of that challenge the City and DSS continue to innovate and partner with sister agencies in mobilizing resources to assist our clients.

### **Investment in NYC's Housing Stock**

Recognizing we are in a housing emergency, DSS is leaving no stone unturned in our efforts to connect New Yorkers in shelter to housing and has embarked on a program to use social service dollars to actually *create* deeply affordable housing. We announced our groundbreaking Affordable Housing Services program in the beginning of 2024. Through this initiative we are fast-tracking the creation of newly constructed high-quality and deeply affordable housing for CityFHEPS voucher holder in shelter. The agency will develop nearly 900 units through this program during the Adams administration. To date the agency has brought four high-quality sites comprising of 240 units online with most of these units leased up in a matter of weeks.

## **Streamlining CityFHEPS Processes**

We understand that CityFHEPS is a complicated and intricate program. DSS is committed to progressively strengthening the program over time. In recent years we have worked to increase subsidy access by reducing work requirements for families with children, eliminating the 90-day rule, and allowing for the use of CityFHEPS statewide.

We have also focused on ways to generate more housing packages by holding providers accountable for meeting exit targets, and training shelter staff on best practices for complete and thorough submissions to ensure housing packages can be expedited to get clients housed as quickly as possible.

And finally, we have invested in technical improvements to help streamline the process. We continue to work to reduce client and landlord administrative burden by improving systems like Access HRA and CurRentNYC. We are streamlining workflows and thinking critically about what documentation we really need. Doing so reduces the clients' paperwork and form-filling burden. To give just one example of how we are approaching this work: we are currently partnering with a nonprofit, RE!NSTITUTE, that has a long history of bringing together people with lived experience of homelessness, government and providers to facilitate housing placements for households experiencing homelessness. They are helping us bring down our package return rate, since we know that when we have to return a CityFHEPS package to a shelter provider because documentation is missing or inaccurate, it adds time to that household's shelter stay. RE!NSTITUTE is looking at both DHS and provider workflows to identify ways we can improve.

Process improvement is an ongoing endeavor, as, step by step, we gather input, reflect, and reassess based on client and stakeholder experience. We are committed to listening to feedback from our clients and stakeholders and exploring what we can make work better – even in the face of a tight affordable housing market and other complex challenges.

## **Network of Housing Subsidies for New Yorkers**

Though our focus is CityFHEPS today I do want to highlight that this subsidy is part of a larger landscape of housing subsidies that serve New Yorkers experiencing homelessness and low income households generally. 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 New York City Housing Authority (NYCHA) housing all serve as important tools in providing crucial aid.

Situating CityFHEPS in a broader policy context, it is important to recognize that other levels of government share the responsibility to devote resources to protecting housing stability overall, and through the avenue of rental assistance in particular. Relatively speaking, our municipal City government, has the least latitude and fiscal capacity when compared to state

and federal partners; while we can provide evidence of the efficacy of our policies and strategies, I would like to underscore the need for further investment by our government partners. Investment in these other housing subsidies is essential to ensuring New Yorkers at risk of housing instability receive as many resources as possible.

Lastly, I want to briefly deviate from CityFHEPS entirely, and flag a time-sensitive issue that will affect many voucher holders and your constituents generally. As of April 2025, households receiving Medicaid must recertify in order to maintain their coverage. The COVID-era extensions are fully exhausted, and it is critical that Medicaid recipients recertify. We want every eligible household to maintain their coverage, so strongly urge everyone to respond to DSS recertification notices. We welcome the opportunity to collaborate with the Council on getting this message out.

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

Thank you.



Testimony before the New York City Council  
Committee on General Welfare  
January 27, 2025

**Laura Lazarus**  
Chief Executive Officer  
Anthos | Home  
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*Anthos | Home combats homelessness by partnering with government and social service agencies to help people with housing vouchers secure apartments more quickly, leveraging our unique financial capabilities to support tenants and landlords throughout the process.*

[www.anthoshome.org](http://www.anthoshome.org)

Good morning, Chairpersons Ayala and Brewer and members of the Committee. My name is Laura Lazarus, and I am the Co-Founder and Chief Executive Officer of Anthos | Home. Thank you for the opportunity to testify today and share insights about how we can improve housing outcomes for New Yorkers who use housing vouchers.

Anthos|Home is committed to helping New Yorkers using vouchers transition into permanent housing as quickly as possible, with a goal of having that happen within two months. We know that housing vouchers are one of the most effective tools we have to address homelessness and housing instability. Still, they can be difficult to use. Here in New York City, it takes families an average of at least a year to find housing after receiving a voucher, and nearly half of all voucher holders cannot secure a suitable apartment.

Every day, we see how programs like CityFHEPS can change lives, but we also encounter barriers that prevent voucher holders from accessing stable housing. These issues are decades in the making and can prolong shelter stays and leave families in unstable and difficult conditions. The challenges include finding landlords willing to accept vouchers, delays in processing approvals and payments, and the need for more robust support services to help tenants succeed in maintaining their homes.

Our model helps tenants and landlords overcome those common roadblocks. Here is how it works:

We proactively reserve and identify eligible apartments through a network of landlords and brokers, ensuring families with vouchers can access housing options immediately. This is the first and only initiative of its kind in New York City. Additionally, our flexible



funding model allows us to cover necessary repairs to pass inspections, moving costs, application fees, and more—removing common barriers that prevent families from moving in quickly.

Our expert team also guides both tenants and landlords through the often-complicated housing process. From assisting with paperwork to ensuring units and tenants are move-in ready, we streamline what can otherwise be a slow and disjointed process. Once families are housed, we provide wraparound support for at least a year for both tenants and landlords. This support includes monthly check-ins, help with repairs, and intervention if payment issues arise. Our flexible funding can be used to help address utility costs, or to ensure a landlord receives payment even if a government check is delayed. By offering this ongoing support, we reduce the burden on landlords, allowing them to focus on property management while we handle tenant-related challenges.

This model has been especially effective for vulnerable populations, like foster youth and individuals with complex health needs, who often need extra guidance to navigate the system and achieve stability.

In 2023, we entered into a partnership with the NYC Administration for Children Services to support young people who have aged out of the foster care system as well as families who are involved with child welfare and in shelter. Our approach is working—to date, we have helped nearly 250 families and individuals move into housing, and of those, one hundred are former foster youth who are now settled in dignified, stable apartments. All of them remain stably housed. Each element of the model—our partnership with government, direct support of tenants, and working relationships with landlords—made this possible. We're in active discussions to bring our approach to other city agencies.

CityFHEPS is a critical resource; its impact could be even greater with targeted improvements. Streamlining the process, addressing inspection delays and creating



more effective landlord engagement would significantly reduce bottlenecks. At Anthos|Home, we've seen firsthand how these changes can lead to faster transitions and better outcomes for tenants and landlords alike.

We have helped nearly 500 New Yorkers move into permanent housing, significantly reducing the average wait time to just a few months. Our model is creating long-term stability for families and individuals who might otherwise cycle through unsafe conditions. These successes demonstrate that targeted, well-supported interventions can make a measurable difference.

Thank you for the opportunity to speak with you today. I can answer any questions you may have.





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**TESTIMONY OF:**

**Alexandra Dougherty, Team Leader and Senior Staff Attorney  
Civil Justice Practice**

**BROOKLYN DEFENDER SERVICES**

**Presented before**

**The New York City Council  
Committee on General Welfare**

**Oversight Hearing on Administration of CityFHEPS**

**January 27, 2025**

My name is Alexandra Dougherty, and I am a Team Leader and Senior Staff Attorney of the Civil Justice Practice at Brooklyn Defender Services. 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 over 25 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. I want to thank the Committee on General Welfare and Chair Ayala for inviting us to testify today about bolstering the CityFHEPS program.

BDS represents approximately 22,000 people each year who are accused of a crime, facing the removal of their children to the foster system, or 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. The people we serve experience housing instability in a variety of ways: we defend people from eviction in housing court, provide proactive relocation assistance and benefits advocacy, and help clients navigate the shelter system. Our Civil Justice Practice works with clients who are entering the

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shelter system, as well as shelter residents attempting to secure stable housing. Through this work we see the profound challenges New Yorkers face in accessing shelter and stable housing.

## **Background**

Amidst a persistent and escalating affordable housing crisis in New York City, 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 New York City's Human Resources Administration (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 respectfully offer the following recommendations to address major issues and strengthen the CityFHEPS program.

## **Recommendations**

### **I. Eligibility and Voucher Issuance**

Both clients living in shelter and those facing eviction face significant obstacles to obtaining CityFHEPS vouchers. Many 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 living in shelters still wait months to be issued vouchers due to confusion and miscommunication over eligibility criteria. In several cases, those we represent have been erroneously subjected to the 90-day shelter stay eligibility requirement, which was eliminated in 2023. We have also seen people given contradictory information by shelter staff regarding immigration status requirements, despite establishing eligibility under PRUCOL.

People facing eviction wait several months for a Homebase appointment to be assessed for CityFHEPS. Homebase remains the only organization that can screen these applicants for CityFHEPS eligibility and issue shopping letters. The significant backlog and delays that began during the pandemic persist today, despite eviction filings in housing court returning to pre-COVID levels. By the time those we represent are issued shopping letters, their eviction cases have progressed in housing court and they have looming move-out deadlines. By way of example, one person we represent, Ms. B, initially reached out to Homebase in October 2023 when she received a notice of termination from her landlord. Ms. B did not receive a response from Homebase until our office reached out to Homebase supervisors. In March 2024 she was finally given an intake appointment but was mistakenly sent to HRA for a FHEPS restoration, which Ms. B was not eligible for. Homebase did not issue a shopping letter until July 2024, *after* her move-out deadline agreed upon in court. During the months that Ms. B waited for a shopping letter from Homebase,

she was unable to look for new housing. Although they were initially able to postpone the eviction, she and her family were forced to enter shelter because they were not able to secure a CityFHEPS-eligible apartment. This situation was entirely avoidable but, unfortunately, not unusual.

It is vital that the city make sure that Homebase is adequately staffed, resourced, and trained, so that shopping letters can be issued in a timely fashion. 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 like Ms. B's will suffer devastating consequences.

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

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. Expanding access to CityFHEPS is meaningless without also expanding access to apartments. Despite New York City's strong source of income discrimination protections, landlords and brokers know that enforcement is weak, and they are unlikely to be held accountable for turning away voucher-holders. The Council and HRA must work with the NYC Commission on Human Rights to strengthen enforcement of source of income discrimination laws and must make sure that shelter and Homebase staff equip voucher-holders with the tools and resources they need to locate apartments.

While combating source of income discrimination and building relationships with landlords need to be ongoing priorities, there are several immediate fixes that can expand the pool of apartments available to CityFHEPS voucher holders. First, the utility allowance causes unnecessary confusion for all parties—brokers, landlords, and voucher holders—and should be eliminated. Several people we represent have found apartments within voucher limits after months of searching only to learn the apartment is ineligible because utilities are not included. The discrepancy has been as little as \$11.00. Landlords and brokers advertising on sites geared towards voucher holders advertise rents at the maximum subsidy amount. Adding the utility allowance causes confusion, making an already complicated process more difficult for both clients and landlords.

Additionally, FHEPS, CityFHEPS from shelter, and CityFHEPS in the community all provide different incentives, which leads to confusion and jeopardizes the process of securing an apartment. Unit hold incentives should be consistent for all vouchers. This information is not always clear in shopping letters, which usually state that brokers “may receive a fee of up to 15%” and that additional incentives may be available. When different information emerges mid-approval process it causes unnecessary conflict and can ultimately lead to the client losing out on housing. It is also essential that if the landlord, broker, and tenant are complying with requirements in a timely fashion, HRA guarantee a hold fee for the entirety of the approval period. Approvals regularly take well over a month, and it is unrealistic to expect that landlords will be willing to



forego rent they could be collecting from a tenant who could afford to pay rent out of pocket and move in immediately.

The Council must do everything in its power to make the CityFHEPS processes as consistent and straightforward as possible. Eliminating the utility allowance, standardizing incentives, and guaranteeing a hold fee for the entire approval are steps HRA can take right now to make more apartments available and reduce confusion and frustration that erodes trust in the CityFHEPS program. Meanwhile, the Council and HRA must also work to strengthen source of income discrimination enforcement and build relationships with landlords and brokers to ensure that there are apartments readily available to all CityFHEPS participants.

### **III. Approval Process**

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 applicant 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 given Homebase workers' packed schedules. 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. In one recent case, HRA issued checks to the wrong landlord. The person we represent in the matter was unable to reach his Homebase caseworker about reissuing the checks for several weeks, putting him at risk of eviction and of losing his new apartment.

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 establish strict time-guidelines for the approval process, as well as adequate funding and training to ensure that approvals take less than one month. The Council should require that HRA publish the expected timeline and report on compliance. We also suggest that HRA work to implement direct deposit to avoid delays and missing checks.

### **Conclusion**

Permanent affordable housing is the foundation many New Yorkers, including the people we serve, need to find stability in their lives. Stable housing helps our clients favorably resolve their criminal cases, reunite with their children after ACS involvement, maintain jobs, and allow children to remain in school. Now is the moment, when the housing and homelessness crisis is deepening, to implement changes to strengthen the CityFHEPS program. These changes will ensure that CityFHEPS is a reliable path to stable, affordable housing. We urge this committee to strongly consider our recommendations.

Thank you for your time and consideration of our comments. We look forward to further discussing these and other issues that impact the communities we serve. If you have any additional questions, please contact me at [adougherty@bds.org](mailto:adougherty@bds.org).



**Testimony of Chelsea Rose  
Policy & Advocacy Manager  
Care For the Homeless**

**Provided to the New York City Council  
General Welfare Committee  
January 27, 2025**

I would like to thank Deputy Speaker and Chair Diana Ayala and all members of the General Welfare Committee for holding today's oversight hearing on the administration of the CityFHEPS rental assistance program.

Care For the Homeless has 40 years of experience providing medical and behavioral health services exclusively to people experiencing homelessness in New York City. We operate 22 federally qualified community health centers in all five boroughs. Our service sites are co-located at facilities operated by other non-profits that include shelters for single adults and families, assessment centers, soup kitchens, and drop-in centers. Additionally, our community-based health center model brings services directly to neighborhoods where the need is most significant. Both models reduce barriers unhoused New Yorkers regularly face in navigating a complex health care system by increasing access to high-quality, patient-centered, primary and behavioral health services. We also operate 2 shelters for women, and 2 shelters for men experiencing homelessness, and one Safe Haven focused on people experiencing unsheltered homelessness, all of which have on-site health centers for their residents and the community. In these programs, our goal is to end episodes of homelessness by providing essential supportive services to help our residents obtain stable and permanent housing.

Over the past few years, we have been actively engaged as part of the *Homes Can't Wait Coalition* to address the challenges faced by both voucher holders and staff members in accessing, navigating, and utilizing the CityFHEPS voucher program. We testified two years ago on the need to address the administrative barriers that prevented New Yorkers experiencing homelessness from utilizing an effective tool to find stable housing. Several of our initial recommendations have been implemented and we want to thank the Council for their efforts to pass these needed fixes. However, despite some notable improvements, we are calling for a renewed emphasis on enhancing the capacity and expertise of DSS staff working with providers and voucher holders to ensure that they can transition into housing quickly and efficiently.

While we acknowledge and commend the Administration for taking meaningful steps to both improve the effectiveness of the CityFHEPS voucher and address long-standing issues, significant administrative barriers persist. These barriers continue to impact the program's accessibility and reliability. Below, we outline several immediate changes that could greatly improve the effectiveness of the CityFHEPS voucher program.

**Improve the capacity, accessibility and expertise of HRA staff processing CityFHEPS applications** to enhance reliability throughout the application process and avoid delays that hinder housing placements. Staffing shortages at HRA leads to inconsistent knowledge of procedures needed to move CityFHEPS applications forward, including the needs for public assistance files to be active, which creates barriers that delay housing placements for eligible New Yorkers. Additionally, the lack of a reliable communication method between HRA Case Managers and service providers has resulted in processing delays pushing back move in dates for our residents.

**Eliminate the backlog of eligible housing voucher applications** to ensure New Yorkers are moved out of shelters and into housing quickly and efficiently. Despite the removal of the 90-day eligibility rule, a backlog of cases continues to impede providers' ability to begin the housing search for residents coming into shelter. On average it still takes 90 days for shopping letters to be issued to eligible shelter residents.

**Improve DHS and HRA Coordination of Public Assistance Rebudgets.** We are seeing delays with household rebudgets taking a couple of weeks or longer, stalling CityFHEPS applications. Unable to inquire with HRA directly, shelter staff must go through DHS, who may offer minimal information without explaining the cause of the delay or how to assist. We recommend that HRA and DHS review rebudgets that exceed the 72-hour expected turnaround time to identify possible steps in the process encountering snags to formulate failsafes to remedy delays. HRA should also proactively inform shelter staff of the status of pending rebudgets and flag additional documentation/next steps which will help the household move forward in the process.

**Commit to a 30-day maximum turnaround from apartment identification to approval** to ensure voucher holders can secure permanent housing. Many voucher holders lose apartments due to the lengthy bureaucratic process required for apartment approvals and check disbursements. The City must expedite CityFHEPS applications to prevent voucher holders from losing scarce housing opportunities, especially given the challenges posed by source-of-income discrimination and rising rents.

**Increase transparency in the application process through a clear electronic tracking system for voucher holders.** The steps involved in obtaining a CityFHEPS voucher and leasing an apartment are difficult to track for both shelter residents and the staff assisting them. While some progress has been made toward increasing transparency, voucher holders still lack insight into the status of their applications. The City should implement an electronic portal that allows voucher holders to track the status of their CityFHEPS application, ensuring greater accountability and clarity.

**DSS should report on every step of the CityFHEPS workflow to increase transparency about the effectiveness of the program.** This includes the average time it takes for an application to reach the next stage in the process, data on preclearance and apartment inspection failures, data on staffing levels and turnover rates of CityFHEPS program specific positions, case ratios, etc. DSS should also annually release performance targets for each stage of a CityFHEPS logic model and release an annual performance evaluation for the preceding fiscal year. This will allow for corrections in the workflow as needed, ensuring that the program is achieving its intended purpose.

**Source of income (SOI) discrimination remains a significant barrier for voucher holders preventing them from utilizing the rental assistance in the private market.** The administration should commit significant resources to hold landlords accountable for rejecting voucher holders. This includes increasing resources to the Commission on Human Rights to investigate and prosecute landlords and brokers who refuse to rent to tenants who pay rent with housing vouchers and other types of housing assistance. DSS should advocate to the State to pass legislation to immediately revoke licenses for brokers or other real estate licensees who are found guilty of SOI discrimination by the City's Commission on Human Rights. DSS should develop and implement 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. The city should also deliver annual public reporting on SOI complaints and the average time it takes to resolve a complaint.

We strongly urge the administration to implement the important changes outlined above. These steps are crucial to ensuring the city maximizes the potential of this valuable resource for communities experiencing homelessness. Making the CityFHEPS voucher program as effective as possible is essential to advancing the fight to prevent and end homelessness.

Thank you for the opportunity to testify today. If you have any questions, please reach out to [crose@cfhnyc.org](mailto:crose@cfhnyc.org).





**Chinese-American Planning Council, Inc.  
Testimony at the New York City Council General Welfare Committee  
Honorable Diana Ayala, Chair  
January 27th, 2025**

Thank you Chair Ayala and the Members of the City Council for the opportunity to testify today. The mission of the Chinese-American Planning Council, Inc. (CPC) is to promote social and economic empowerment of Chinese American, immigrant, and low-income communities. CPC was founded in 1965 as a grassroots, community-based organization in response to the end of the Chinese Exclusion years and the passing of the Immigration Reform Act of 1965. Our services have expanded since our founding to include three key program areas: education, family support, and community and economic empowerment.

CPC is the largest Asian American social service organization in the U.S., providing vital resources to more than 80,000 people per year through more than 50 programs at over 30 sites across Manhattan, Brooklyn, and Queens. CPC employs over 700 staff whose comprehensive services are linguistically accessible, culturally sensitive, and highly effective in reaching low-income and immigrant individuals and families. With the firm belief that social service can incite social change, CPC strives to empower our constituents as agents of social justice, with the overarching goal of advancing and transforming communities.

To that end, we are grateful to testify about issues that impact the individuals and families we serve, and we are grateful to the Council for their leadership on these issues.

The “Housing First” model has proven to be a vital step in providing stable housing for formerly homeless seniors. Under this model, we place seniors in permanent housing with a limited-term housing voucher, specifically through the CityFHEPS program. The assumption is that, after five years, these seniors will be able to transition to independent management of their housing resources. However, this approach fails to adequately address the unique needs of seniors who are no longer on an employment track and rely primarily on fixed incomes such as Social Security, Supplemental Security Income (SSI), and State Supplemental Payment (SSP).

Our program serves 28 units specifically set aside for seniors with histories of long-term homelessness. Each of these seniors has been designated as a “long-term stayer,” meaning they have spent many years in the shelter system, often with one persistent case, cycling in and out of shelters. Given their histories and the limited financial resources available to them, the five-year housing voucher provided by CityFHEPS does not offer a sustainable solution for long-term stability.

Seniors in our program face significant challenges, and the five-year time frame does not account for the complexities of their circumstances. For example, managing CityFHEPS cases often involves dealing with frequent missed payments, complicated recertification processes, and difficulties in ensuring clients make their required contributions to rent. These ongoing issues create instability, rather than supporting the transition to independent housing management.

We thank the Council for the opportunity to testify and hope you take these concerns into consideration when discussing policy changes to the program.

If there are any questions or concerns, please reach out to Ashley Chen, Policy Analyst at [achen9@cpc-nyc.org](mailto:achen9@cpc-nyc.org).

**Testimony Submitted to the  
New York City Human Resources Administration  
Regarding Administration of CityFHEPS**

Dear Committee on General Welfare,

On behalf of Legal Services NYC, we appreciate the opportunity to comment on the administration of CityFHEPS.

Legal Services NYC (LSNYC) is the largest organization in the US devoted to providing free civil legal services to low-income individuals and families. For over fifty years, we have helped our clients meet basic human needs in order to protect and restore human dignity. Annually, LSNYC ensures that legal assistance to thousands of low-income NYC residents results in access to critical government benefits. As part of the CityFHEPS pilot program, LSNYC is one of the organizations authorized by the Department of Social Services (DSS) to submit CityFHEPS to Stay applications on behalf of our clients.

As a CityFHEPS providers, we have identified several procedural and technical issues with the CityFHEPS application, renewal, and modification processes. These issues have impeded our ability to assist clients efficiently. Furthermore, the issues have affected the effectiveness of the CityFHEPS program, as we have witnessed current CityFHEPS recipients facing evictions due to administrative problems within the program. Through this written

**Demand Justice.**

comment, we aim to highlight these concerns and advocate for improvements to ensure that low-income tenants can fully benefit from CityFHEPS.

### **I. Delay And Mistakes with CityFHEPS Renewal and Modification Processes**

Despite submitting renewal applications timely on AccessHRA, some clients have experienced termination of their CityFHEPS benefits without notice, as CityFHEPS repeatedly fails to process renewal applications. Additionally, CityFHEPS is consistently making errors in processing subsidy holders' renewal and modification requests. In cases where clients submit renewal or modification applications due to rent increases, CityFHEPS often fails to adjust the subsidy amounts accurately to reflect the new rent. These errors have resulted in unpaid rent portions which, beyond mere administrative errors, results in families facing eviction in housing court. For example, our client, Ms. P, is the sole caretaker for her two minor children and her rent should be fully covered by CityFHEPS. However, when she submitted her CityFHEPS renewal application along with her most recent renewal lease that showed a rent increase, CityFHEPS failed to update and increase the CityFHEPS portion. As a result, she is currently facing a nonpayment lawsuit because CityFHEPS did not adjust her subsidy to reflect her lease renewal increase.

Another issue concerns CityFHEPS requiring clients to submit notarized rent increase letters from landlords on top of already provided leases and rent ledges reflecting rent increases. This requirement can be particularly challenging when landlords are uncooperative. For example, for two years, Ms. C has been trying to request CityFHEPS to increase its payment because CityFHEPS has inaccurately documented her monthly rent at an outdated amount. However, despite diligent follow-up with CityFHEPS, she was repeatedly told that CityFHEPS would not correct and update her monthly rent unless she provided a notarized letter from the

landlord. Unfortunately, Ms. C. landlord refused to cooperate. As a result, Ms. C is currently facing eviction.

**Recommendations:**

1. Provide comprehensive training for HRA case managers and case handlers on reviewing leases to ensure the CityFHEPS subsidy amounts reflect rent increases accurately and in a timely manner.
2. For modification applications, eliminate the requirement for a notarized rent increase letter when the tenant has already submitted a current lease and rent ledger.

**II. Confusion And Inconsistencies in Policy Implementation Regarding CityFHEPS Applicants Interview Process.**

DSS does not have a clear and consistent policy for interviews in connection with CityFHEPS's applications. As part of the application process, applicants who are not in receipt of Cash Assistance must apply for One-Shot Deal as a prerequisite for their CityFHEPS application. Subsequently, they must complete an eligibility interview so that their case can be put in Single Issuance status. During this process, many of our clients face long delays for an interview, sometimes waiting upwards of two hours on the phone. And in some instances, when clients finally connect with HRA, they are wrongly informed by some representatives that interviews are only available for Cash Assistance, One-Shot Deal, Medicaid, or SNAP applicants, resulting in the rejection of their interview. We have had to inform our clients that HRA was incorrect and advise them to call again.

**Recommendations:**

1. Provide comprehensive trainings for HRA representatives to ensure caseworkers who conduct eligibility interviews have a solid understanding of CityFHEPS

application process and Single Issuance request, and to ensure the information they provide during interviews is accurate.

2. Extend the eligibility interview waiver to CityFHEPS to Stay applicants. DSS Policy Bulletin 2024-013<sup>1</sup> provides an interview waiver for CityFHEPS to Move applicants who are not applying for or do not qualify for ongoing Cash Assistance or SNAP. We recommend that DSS extend the interview waiver to CityFHEPS to Stay applicants to further simplify the application process.

### **III. Extensive Delays in Resolving Applications and Providing Timely Assistance to Advocates' Case Requests**

18 NYCRR § 404.1 provides that DSS/HRA must make a determination of programmatic and/or financial eligibility for all applications or reapplications for services within 30 days of the date of the application.<sup>2</sup> However, both our clients and our organization have experienced chronic and extensive delays in receiving responses from HRA to process renewals, modification applications, or correct mistakes, particularly in the following areas:

- **Delays in processing renewal and modification applications.** HRA's delay in processing renewal and modification applications can result in outdated CityFHEPS amounts or missing payments if the tenant's rent increases in the interim.
- **Delays in processing advocates' case requests.** For example, Mr. B was approved for CityFHEPS to pay rental arrears and ongoing rent. However, CityFHEPS incorrectly listed the landlord's address as the tenant's, which may potentially cause future CityFHEPS payments to be sent to the wrong address. Despite our timely

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<sup>1</sup> See DSS POLICY BULLETIN #2024-013, EXTENSION OF THE CASH ASSISTANCE INTERVIEW WAIVER ON SINGLE ISSUANCE CASES FOR SHELTER AND COMMUNITY MOVES WITH CERTAIN RENTAL SUBSIDY PROGRAMS (August 13, 2024)

<sup>2</sup> "A determination of programmatic and/or financial eligibility must be completed for all applications or reapplications for services within 30 days of the date of application, except for protective services for adults as set forth in Part 457 of this Title." See 18 NYCRR § 404.1(d)

reminder of the error two months ago in early December 2024, the issue has still not been corrected to this day.

**Recommendation:**

1. Commit to creating and publishing a corrective action plan to resolve the systemic delays in processing requests within the requisite timeline of 30 days.

**IV. Technical Deficiencies in CurRent, DSS's Landlord Management System**

We have encountered persistent technical malfunctions within the CurRent system that complicate the submission process. Specifically, the CurRent system only allows providers to enter date ranges for arrears or lease dates if the arrear starts to accrue or the lease starts within a year of the application date, but in reality, applicants may have rental arrears that started accruing over a year ago, or their lease may have started more than a year ago. Additionally, the document upload section in the system has limited options. Both limitations stated above fail to accommodate the complexity of the applications.

Furthermore, despite submitting several IT support requests, we continue to face an ongoing issue where the CurRent system prevents application submission even though all the required fields are completed.

**Recommendations:**

1. Create a single stream where providers can upload all the documents without selecting a specific category or add a "Other" option to accommodate various document types.
2. Hold regular meetings with providers to monitor and address the technical malfunctions within the CurRent system.

In conclusion, the issues outlined above highlight significant challenges we experienced within the CityFHEPS program. Addressing these concerns will help ensure that low-income tenants can access the full benefits of CityFHEPS and avoid unnecessary hardships. We urge prompt action to resolve these issues and improve the overall functioning of the program.

Respectfully submitted,

Diana Garcia  
Paralegal, Government Benefits Unit  
Manhattan Legal Services

Xiaowen Liang  
Staff Attorney, Government Benefits Unit  
Manhattan Legal Services



I'm William Botchway, a Legal Advocate on the Housing Defense team at Neighborhood Defender Service of Harlem. NDS is a community-based public defender office that provides high-quality legal services to residents of Northern Manhattan, including representation in Housing Court through the Right to Counsel Program. My main duty as an advocate is to assist clients with obtaining public benefits such as CityFHEPS to settle their cases and provide them with long term stability.

A year after submitting the application and subsequent contact with Homebase, Adult Protective Services, and HRA, it was only when an impending marshal's notice loomed over our client Mr. F, did we learn that APS should have been processing his case instead of Homebase. These cases are serious and life-changing, yet dozens of people watched Mr. F and my team mistakenly believe his application was being processed for over a year.

Ensuring the efficiency of the CityFHEPS program will alleviate pressure on every government system, save the city money, and provide housing security to our city's most vulnerable residents.

My client Ms. S needed a transfer voucher to move to a larger apartment suitable for her entire family and would not be reunited with her children until that happened. Her application was submitted in April, and she did not receive her voucher until September, without any substantive updates from Homebase in the meantime.

On behalf of our clients, we ask this Committee to consider issuing the following directives regarding the administration of CityFHEPS. Require Homebase, APS, and shelters to commit to informing clients upfront during their intake of each step of the process their application will go through and require faster response times from caseworkers.

We acknowledge that the Council has proposed major changes to the CityFHEPS system, which we wholeheartedly support. However, we also believe that there are many measures that can be put into place immediately under the current structure that will ensure stability for our clients and their families.



Neighbors  
Together

## **New York City Council General Welfare Committee Oversight Hearing on CityFHEPS Administration**

### **Neighbors Together Testimony**

**Written by Amy Blumsack, Director of Organizing & Policy**

**January 27, 2025**

Neighbors Together would like to thank the chair of the General Welfare Committee, Deputy Speaker Ayala, as well as the other members of the committee, for the opportunity to submit testimony on the administration of CityFHEPS.

### **About Neighbors Together**

Neighbors Together is a community based organization located in central Brooklyn. Our organization provides hot meals five days per week in our Community Café, offers a range of one-on-one stabilizing services in our Empowerment Program, and engages members in community organizing, policy advocacy and leadership development in our Community Action Program. We serve approximately 120,000 meals to over 12,000 individuals per year. Over the past year alone, we have seen a 63% increase in the number of meals we are serving, and we see new people on the line every day.

Our members come to us from across the five boroughs of New York City, with the majority living in central Brooklyn. Nearly 60% of our members are homeless or unstably housed, with a significant number staying in shelters, doubled-up with relatives or friends, and living on the street. Approximately 40% of our members rent apartments or rooms in privately owned homes, or live in rent stabilized units.

Over the last five to ten years, our members increasingly report that homelessness and lack of affordable housing options are their primary concern. Our data backs the anecdotal evidence we see and hear from our members daily: an increasing number of our members are either living in shelter with vouchers for years at a time, ineligible for a voucher, or unable to find permanent



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housing due to rampant source of income discrimination and a vacancy rate of under 1% for affordable housing units in New York City.<sup>1</sup>

## Our Work with Voucher Holders

Neighbors Together has been organizing voucher holders since 2018. We conduct Know Your Rights trainings on how to identify and report source of income (SOI) discrimination, and Housing Search Workshops where voucher holders get additional support in their housing search and assistance on filing source of income discrimination complaints to the City Commission on Human Rights (CCHR) when needed. We work closely with CCHR to ensure that source of income discrimination reports are effective and have the best possible outcomes for our members. We also partner with CCHR on their restorative justice set-aside program<sup>2</sup> to ensure that set-aside units obtained through settlements are most likely to go to people in need as efficiently and effectively as possible. Additionally, in partnership with Unlock NYC, we built and launched the Stop Source of Income Discrimination (SID) NYC website,<sup>3</sup> which provides information about source of income discrimination and how to report it as well as a mechanism for reporting via the website.

We work closely with Unlock NYC<sup>4</sup> to improve New Yorkers' ability to utilize their vouchers. Starting in 2019 our members worked with the Unlock team to design and test an online tool to help voucher holders easily report source of income discrimination. The tool has enabled hundreds of our members to quickly and easily gather evidence and report source of discrimination to CCHR. In our partnership with Unlock NYC, we have released multiple reports on source of income discrimination and voucher efficacy, including "An Illusion of Choice," the SOI mapping tool, the "Serial Discriminators List"<sup>5</sup>, as well as ongoing budget advocacy to ensure CCHR is adequately funded to enforce against SOI discrimination.

After over a year of collecting data through the Stop SID NYC website, running know your rights trainings and conducting housing searches for people with vouchers, Neighbors Together built a grassroots organizing campaign of directly impacted people who had voucher shopping letters but couldn't find housing. The **VALUE in Housing (Voucher Advocates Lifting Up Equity in**

<sup>1</sup><https://www.nyc.gov/site/hpd/news/007-24/new-york-city-s-vacancy-rate-reaches-historic-low-1-4-percent-demanding-urgent-action-new#/0>

<sup>2</sup><https://gothamist.com/news/nyc-requiring-landlords-set-aside-apartments-voucher-tenants-under-new-approach-enforcing-human-rights-law>

<sup>3</sup> <https://www.stopsidnyc.com/>

<sup>4</sup> <https://weunlock.nyc/>

<sup>5</sup> <https://weunlock.nyc/data/>



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Housing) campaign created a platform of 5 policy reforms aimed at making vouchers effective tools for accessing permanent affordable housing. Since launching in 2019, the VALUE in Housing campaign has won a significant portion of its platform, including:

- Ensuring that CityFHEPS voucher holders receive know-your-rights information about SOI discrimination upon receipt of their shopping letter
- Increasing the size of the source of income unit at CCHR
- Increasing the payment standard of CityFHEPS to fair market rent
- Improving income requirements for CityFHEPS vouchers so that recipients can increase their income until they are financially self-sufficient without fear of losing their voucher.<sup>6</sup>

## **Comments on the Administration of CityFHEPS**

Neighbors Together is grateful for the opportunity to highlight our experiences with the administration of CityFHEPS, an issue our members have been raising for years.

While Neighbors Together and our members strongly believe that CityFHEPS vouchers are a key tool in helping people exit homelessness, a raft of problems have plagued the administration of the program, stymieing its effectiveness. Listed below are some of the issues that Neighbors Together members and staff continue to encounter, along with recommendations for how to address those issues, as well as brief descriptions of voucher holders' experiences with CityFHEPS.

### **Payments**

- **Timely Payments:** Landlords are indicating to voucher holders and staff assisting them with the housing search that they do not get timely payments from the City for CityFHEPS vouchers, and thereby do not want to accept them. This includes unit payment incentives that have not been paid by move in date.
  - o **Recommendations:**
    - § Ensure that unit hold incentive payments are processed in a timely manner.
- **Accurate Payments:** Members of Neighbors Together report getting rent demand letters and 30-day notices from their landlord because HRA was sending checks to an incorrect address.

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<sup>6</sup> <https://www.stopsidnyc.com/get-involved>



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## o Recommendations:

§ Ensure that checks are sent electronically, and that there is an online portal that shows the status of payments, in order to avoid putting undue stress on the voucher holder.

§ Create a functioning and responsive hotline for landlords to call regarding issues with payments. Mistakes by HRA should not become the burden of the tenant or voucher holder.

## Clarifying and Expediting Application Processes

- **Unclear processes:** The processes for obtaining a CityFHEPS voucher and leasing an apartment with the voucher are opaque, particularly for those currently residing in shelter and for the shelter staff that are assisting them. Voucher holders do not have information regarding the steps in the process and are unable to make sure their apartment applications are moving forward.
- **Delays in Shopping Letters:** Homeless New Yorkers are waiting months at a time to receive their CityFHEPS shopping letter, which is the first step in being able to look for an apartment. Although DSS removed the 90-day eligibility requirement from CityFHEPS, delays in receiving shopping letters create a de facto waiting period before people can access a rental assistance voucher, thereby undoing the purported progress under this rule change.
- **Member Story:** A Neighbors Together member was using a CityFHEPS transfer voucher to move out of his apartment, which was dilapidated and neglected by the landlord. He was connected to an apartment through the City Commission on Human Rights' set-aside program, and in October 2022, he started his package process, and submitted all necessary paperwork. He was informed that he needed to get the CityFHEPS voucher back on his budget. By February 2023 the voucher holder had still not heard anything regarding his voucher and re-budgeting. The Neighbors Together housing services specialist reached out to his housing specialist at Homebase but received no response. The Neighbors Together staff member reached out again in March, and again received no response. Finally, in April 2023, over six months after he submitted his initial paperwork, the member received CityFHEPS renewal documents, which he promptly filled out and submitted. By the end of June the member still hadn't heard anything, so Neighbors Together staff reached out. The Homebase worker said that they still hadn't heard anything from HRA. After months of not hearing back from HRA about the member's renewal packet, Neighbors Together's housing services specialist reached out to Homebase in early October 2023, only to be informed that the



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member's case was closed, and that Homebase was just informed by HRA the previous week. With the process taking over a year, and his case being inexplicably closed, the member lost the set-aside apartment and was left back at square one, in dire circumstances. By December 2023, the member made the decision to re-enter shelter, as it was the only way for him to get out of his unsafe apartment and requalify for a CityFHEPS voucher. Although he was reapproved for the voucher, he has not been able to find an apartment, and remains homeless over a year after re-entering shelter.

## o Recommendations:

§ Provide clear steps to those applying for a CityFHEPS voucher, those in the process of leasing an apartment with the voucher, and the staff members at shelters assisting them for each process.

§ Create an online tracker that both voucher holders and their advocates can access that clearly delineates the specific steps in the process and shows where the voucher holder's application is in that process.

§ Fully implement local law 118-2020, to allow voucher holders and staff to view the status of their applications and renewals online.

- **Preclearance:** There is often significant delay in submission, delay in response, and frequent rejections for non-substantive reasons. Preclearances are sometimes performed before deeds are submitted, causing the unit to fail. If a preclearance is rejected, shelter staff are often unable to resolve the issue. Following up with preclearance staff after a unit fails can take an additional 5-7 days to receive a response.
- **Member Story:** A Neighbors Together member applied to an apartment with her CityFHEPS voucher. Our Member Advocate completed the preclearance document and notified multiple staff at Homebase the first week in December, 2024. There was a problem with sending over the preclearance attachment, but no one from Homebase notified our Member Advocate until the second week of January, 2025. So for almost a month, none of the staff at Homebase took action to move the preclearance forward despite their ability to do so. Because of the delay in the preclearance submission, the member will likely have her move-in date pushed back until March 1st, 2025. Because she is currently in a nursing facility where she is being charged \$600 per day, this delay in move-in will cost her approximately \$24,000 in nursing home fees. Although she cannot afford the nursing home, her physical condition prevents her from entering shelter, as does the fact that she would lose her "in community" CityFHEPS voucher and have to start the process



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from the very beginning with an “in shelter” CityFHEPS voucher. This delay was entirely unnecessary and will have harmful ramifications for the voucher holder. Additionally, the landlord is frustrated by the delay as well, which makes him less likely to want to work with the CityFHEPS program in the future.

- o **Recommendations:**

- § Ensure shelter staff are submitting preclearances immediately upon confirming intent to rent.

- § DSS staff should work collaboratively with the shelter, voucher holder, and landlord to resolve issues with preclearance.

- § Ensure that preclearance is submitted with or after relevant landlord documents, including the deed, and that the preclearance website has a document upload portal. If ACRIS and HPD BIS portals are not updated with current information, there should be an ability to submit corrected documents.

- § Hire additional DSS staff if necessary to ensure New Yorkers experiencing homelessness are moved into housing expeditiously.

- § Clarify who is responsible for the preclearance process. Neighbors Together’s staff have encountered instances where the Housing Specialist was supposed to do it, where the landlord did it, and where no one proactively took responsibility for it. Neighbors Together staff have now taken it upon themselves to do the preclearance in order to remove it as a potential holdup for members’ packets.

- **Inspection:** There are significant delays in scheduling inspections at the shelter level, which can often take weeks or months.

- o **Recommendations:**

- § Expedite inspections at the shelter level to ensure they are completed within 7 business days of receiving a passed preclearance document.

- **Packet Preparation:** There are significant delays in shelters preparing packets and a lack of training for the shelter staff who are preparing them. There is also a high number of packet rejections for trivial, non-substantive reasons, such as typos, or slightly different names for the landlord and/or LLC. These minor issues are ones that could be easily addressed with minimal effort, but DSS staff reviewing packets often reject the packet at the first issue, so subsequent packet submissions may still have additional issues, and packets end up being re-submitted three to four times before they are approved.



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- o **Recommendations:**

- § Expedite packet preparation at the shelter level so that all New Yorkers experiencing homelessness are moved into housing within 30 days of submitting necessary to their housing specialist.

- § Ensure that staff is trained on all needed information.

- § If a packet is missing information or cannot be approved, Agency staff should work collaboratively to identify and address all specific issues instead of requiring that full packet be resubmitted. This includes standardizing the process for preclearance to ensure that all issues are flagged during the first review and resolved quickly with minimal delays.

- § Hire additional DSS staff if necessary to ensure New Yorkers experiencing homelessness are moved into housing within 30 days of submitting necessary to their housing specialist.

- **Delay in Packet Review:** There are significant delays in CityFHEPS packet review and check preparation by DSS. These delays can lead to a voucher holder losing out on an apartment if the landlord is not willing to wait.
- **Member Story:** Neighbors Together worked with a member whose packet approval was delayed by two months, during which her shopping letter expired, and therefore she lost an apartment and has remained homeless for the last year and a half. Ultimately, she was unable to secure housing because of the dysfunction of the program.

- o **Recommendations:**

- § Expedite these processes to ensure 48 hour turnaround for packets and 48 hour turnaround for checks.

- § Hire additional DSS staff if necessary to ensure New Yorkers experiencing homelessness are moved into housing within 30 days of submitting necessary to their housing specialist.

- § Providers and landlords should not be required to resubmit updated packages or leases when HRA does not review them in a timely manner.

- **Improve DHS and HRA Coordination of Public Assistance Rebudgets:** Shelter providers are seeing delays with household rebudgets taking a couple of weeks or longer, stalling CityFHEPS applications. Unable to inquire with HRA directly, shelter staff must go through DHS, who may offer minimal information (e.g., only that the rebudget is in progress) without explaining the cause of the delay or how to assist.





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- **Recommendations:**
  - § HRA and DHS should review rebudgets that exceed the 72 hour expected turnaround time, in order to identify issues causing the delay. After clearly identifying the issues causing delay, HRA and DHS should institute systems to circumvent the issue altogether, or to quickly remedy them.
  - § HRA should proactively inform shelter staff of the status of pending rebudgets and flag additional documentation/next steps which will help the household move forward in the process.
- **Clear Contacts:** There are no clear contacts provided for DSS if individuals run into issues using their CityFHEPS voucher, leaving people stuck in the process and unable to move forward.
  - **Recommendations:**
    - § Provide voucher holders with clear contacts for them to reach out to DSS if the shelter or Agency staff is not moving forward with processing their apartment.
- **Improving Responsiveness from DSS:** When shelter staff are assisting clients in the application or lease up processes and have a question, their emails and phone messages sent to DSS often go unanswered. This can lead to packets being submitted with errors or the delays mentioned above.
  - **Recommendations:**
    - § Provide clear contacts for shelter staff assisting in the process and answer inquiries within 24 hours.
    - § Hire additional DSS staff if necessary to ensure New Yorkers experiencing homelessness are moved into housing within 30 days of submitting necessary to their housing specialist.

## HomeBase

- Homebase is deeply understaffed and so voucher holders living in community are waiting months to have their packets processed once they have been approved for an apartment, which jeopardizes or causes them to lose the opportunity.
- Neighbors Together staff who assist members with finding housing have seen members wait anywhere from one to four months for an appointment at Homebase, regardless of the specific need or its urgency. Additionally, members report different practices at



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different Homebase locations - some allow walk-ins and some do not; some require an appointment, and those are typically months out.

- **Member Stories:** Neighbors Together members who went to Homebase for their shopping letter were told that they would not receive one, despite meeting eligibility requirements for CityFHEPS. They were told to come back for the shopping letter once they found an apartment within their voucher payment standard. Given the speed at which the New York City housing market moves, this unnecessary delay in the process will almost surely cause voucher holders to lose housing opportunities.
  - **Recommendations:**
    - § Triage paperwork for those who have been accepted or approved for a unit by landlords or management companies to ensure they don't lose out on an opportunity.
    - § Ensure that all CityFHEPS eligible individuals are provided with a shopping letter immediately.

## **Additional Recommendations:**

- Baseline and increase the funding for CityFHEPS in FY26 and outyears to fully fund the CityFHEPS voucher program
- Implement the CityFHEPS Reform laws
- Apply the additional \$215 million in CityFHEPS funding secured through the City of Yes/City for All agreement to the most vulnerable households at risk of eviction
- Continue to improve capacity at the Commission on Human Rights to fight source of income discrimination
  - Increase funding for the Commission on Human Rights in order to, at minimum, double the size of the Law Enforcement Bureau
  - Exempt the Commission on Human Rights from hiring freezes and 2-to-1 or 1-to-1 hiring limitations
  - Increase salaries for Attorney I and Attorney II positions in order to attract and retain talent
- Ensure access to the utility allowance
- Ensure timely distribution of shopping letters in order to comply with the elimination of the 90-day rule
- Adopt the Exception Payment Standard, used by HPD and NYCHA, to help CityFHEPS voucher holders gain access to high-opportunity areas of the city and mitigate income segregation.
- Allow community-based organizations to complete and submit CityFHEPS applications in addition to Homebase. This will help ease the burden on Homebase's strained capacity,



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as well as create additional avenues through which people can access the CityFHEPS voucher.

## **Conclusion**

In the midst of New York City's ongoing housing crisis and record high homelessness, it is imperative that DSS do everything within its power to streamline processes and increase capacity in order to make the CityFHEPS voucher program work well. Advocates have been raising the problems with CityFHEPS and recommendations for addressing those problems for years. Vouchers are a vital means of both accessing housing and avoiding eviction - any New Yorker who needs rental assistance deserves to be met by a functioning system in which they are treated with dignity, care, and urgency. Thank you for your attention to this important matter.

*For questions regarding this testimony, please contact Amy Blumsack, Director of Organizing & Policy at Neighbors Together, at [amy@neighborstogether.org](mailto:amy@neighborstogether.org).*

Testimony by the New York Legal Assistance Group,  
Oversight – The CityFHEPS Rental Assistance Program  
Before the New York City Council Committee on General Welfare  
January 27, 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. My name is Graham Horn, and I am a staff 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 an 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 together with you to find ways to continue to push the City towards implementing 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.

1. We Thank City Council for Continuing to Pursue 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 destabilize 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 to families and individuals experiencing housing insecurity. We thank the Council for your heroic efforts on CityFHEPS expansion.

2. The Administration of the CityFHEPS Program Causes Landlords Not to Want to Rent to Voucher Holders.

CityFHEPS voucher holders are discriminated against by a host of entities, including landlords and brokers. Even with laws passed to provide information about source of income discrimination to city rental assistance applicants, more is needed to ensure that CityFHEPS vouchers are actually usable by clients.

While it is true that some landlords simply do not want to rent to lower-income tenants, our clients report that much of landlords' reticence to rent to voucher holding tenants stems from the New York City DSS's own practices, not the clients themselves. Landlords are understandably concerned that there will be administrative problems with getting the apartment approved for voucher use and, once approved, problems with collecting rent.

Once NYLAG clients can find below-market apartments that fit the CityFHEPS rental guidelines, the process of getting that apartment approved for a voucher is slow and overly burdensome for landlords, and often riddled with administrative

errors by DSS. DSS' apartment approval for CityFHEPS voucher use most often takes months.

One reason for this delay is that for clients in shelter seeking to use a voucher, shelter housing specialists or caseworkers are solely responsible for processing the application and are the only ones able to act as an intermediary between DSS and the landlord. Clients report that they frequently experience a communication breakdown between their shelter caseworkers, DSS, and the landlords. If a willing landlord makes a small mistake on the application (as will often happen), it can take many days or even weeks before that information is relayed from DSS to caseworkers and back to the landlord. Neither the landlords nor the clients work directly with DSS, and often the application's deficiency will be lost in translation. Clients consistently report forms being filled out incorrectly multiple times, because landlords are not informed as to which parts of the form are incorrect.

Simplifying this back-and-forth game of telephone would alleviate pressure on the CityFHEPS system at all levels. If the application process were digitized, on the model of AccessHRA, 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. Currently in such cases advocacy from an organization such as NYLAG is necessary in order to get all the various stakeholders back on track together.

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 and noncommunication will continue to persist.

Another common refrain from clients is that DSS is not able to schedule apartment inspections in a timely manner. Just last month I had a client have her packet rejected because the inspector inadvertently inspected the wrong apartment in the building. Luckily, I was already working with this client and was able to act quickly enough to have the rejection reversed (though we are still waiting for final approval). Most applicants do not have representation in this process. Even when a landlord is initially willing to hold an apartment to complete the process, often, after several weeks, they are forced to rent an apartment to someone who can start the lease and begin paying rent more quickly in order to pay their bills. NYLAG clients report having to wait months between finding an apartment with a landlord willing to take a voucher and actually getting approval to execute the lease. Many apartments are lost in the process.

Once the apartment is approved and the client moves in, problems with DSS persist. As explained in more detail below, clients who rely on CityFHEPS vouchers report that DSS does not pay their rent on time, and sometimes will discontinue paying rent without notice. Indeed, landlords have created a website, [www.nycfheps.com](http://www.nycfheps.com), to warn each other about the pitfalls of renting to voucher holders. Although some of the stories posted complain about so-called “difficult” tenants, most complaints state that they will not rent to voucher holders because of



DSS's slow processing, late rents, and discontinuing benefits mid-lease. Evidently, much of the reluctance to rent to voucher holders is attributable to DSS's administrative failures, which is entirely within the City's control. We urge this Council to continue to pass legislation aimed at DSS administrative practices and procedures.

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 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 approval system.

### 3. DSS's Unresponsiveness to CityFHEPS Voucher Holders Creates Housing Instability

Once a client is able to find an apartment and get it approved for CityFHEPS, problems persist for our clients with the administration of the benefit. As alluded to above, there are a host of complications that begin with clients being unable to reach anyone at CityFHEPS to report changes and missing benefits. While clients may report some changes on AccessHRA, often modification requests made via that

platform are ignored or budgeted incorrectly. The least fortunate clients experience such long delays in correcting problems with their CityFHEPS cases that they end up back in housing court and at risk of homelessness once again.

Our clients who rely on CityFHEPS vouchers report that DSS often does not pay their rent on time and sometimes will discontinue rental payments without notice to the client or the landlord. We routinely represent clients who are in months of arrears without being made aware that the payments were not being made. Some clients do not learn that they are in arrears until the landlord serves them with a new petition. NYLAG attorneys and paralegals conduct extensive advocacy with HRA to reinstate these programs and get retroactive payments issued to the landlord, but we are extremely concerned about the majority of benefits recipients who do not have an advocate to help them navigate these broken and convoluted bureaucratic systems. DSS must be adequately staffed so that every voucher holder is able to access help maintaining their subsidy. Moreover, if DSS digitized check issuance where possible, delays relating to mail or check cashing error would be greatly ameliorated.

#### 4. DSS Must Address Delays in Regular Benefits Application Processing

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

these clients must, at the very least, have a “single issuance” public assistance case opened by DSS to administer the CityFHEPS.

One recent NYLAG client facing eviction was conditionally approved for CityFHEPS, pending the approval of the public assistance “single issuance” case. NYLAG assisted the client in filling out the application and submitting documentation. DSS then failed to connect with the client to complete the phone interview, despite multiple attempts by NYLAG to facilitate this connection. It took two attorneys and dozens of emails before we were able to get the case opened and CityFHEPS payments issued. Meanwhile, the client was at serious risk of eviction.

Other problems with the administration of public assistance benefits affect CityFHEPS recipients. When a CityFHEPS recipient has an ongoing public assistance case, they are not required to separately recertify for CityFHEPS. However, if the public assistance case closes, the client continues to be eligible for CityFHEPS without an active public assistance case, but they are required to complete a separate CityFHEPS recertification. DSS does not clearly relay this information to our clients. They often learn months after their public assistance case has closed that their CityFHEPS payments stopped soon thereafter, and that they have now accrued months of arrears. This is exacerbated by the extended wait-times to meet with a Homebase worker to attempt to rectify the arrears. One recent client reported that he had requested a Homebase appointment but no appointment was available for several months. In the meantime, his landlord had initiated eviction proceedings.

As suggested above, we believe that these long delays would be dramatically reduced by increased staffing to the DSS review lines, and to Homebase. Similarly, an

online portal dedicated to administering the CityFHEPS program would prevent the situation described above, where public assistance cases close causing CityFHEPS payments to also stop. 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 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. We hope we can continue to be a resource for you going forward.

Respectfully submitted,

New York Legal Assistance Group



**Testimonial Letter to the New York City Council Committee on Cultural Affairs, Libraries, and International Intergroup Relations**

Hon. Carlina Rivera, Chair

Hearing: Oversight - Pathways into the Arts and Cultural Workforce for New Yorkers

*January 27, 2025*

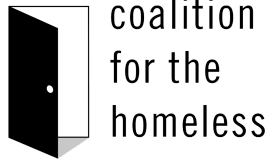
Thank you to Chair Rivera and the City Council for your support of cultural workforce development in New York City. My name is Julius Stone, and I work at Partnership with Children. I'm testifying as part of the It Starts with the Arts coalition to testify on the importance of workforce development opportunities in the arts and culture sector.

Since 1908, Partnership with Children (PWC) has strengthened the emotional, social, and cognitive skills of children in New York City to succeed in school, society, and life. We place licensed clinical social workers and teaching artists in schools to provide young people growing up in poverty with trauma-informed mental health counseling, community-based programming, and healing-based arts education. Through this approach, our students build the skills necessary to break cycles of poverty and become advocates for their communities. PWC's youth mental health, healing arts, and community-based programming impacts over 27,000 children, families, and community members across 47 NYC public schools. In 2015, PWC began partnering with the Office of Community Schools as a lead community-based organization in community schools across the city.

Our Career Development program focuses specifically on building the next generation of arts leaders from New York City's high school students in underserved communities. The CDP program brings together BIPOC, artistically minded high school seniors from schools across New York City, to explore pathways toward careers in the arts as a closely knit cohort. The program goal is to introduce the cohort of students to the wealth of career opportunities in New York City's over \$21.2 billion arts industry, assuring that the upcoming generation of arts workers represents our city's full wealth of experiences and identities. Students participate in a 6 week intensive that prepares them to take 6-week internships at prestigious arts organizations all over the city, including The Bronx Documentary Center, Manhattan Theater Club, BIG Architecture, and the Museum of the Chinese in America.

Workforce development in the arts and culture sector brings many benefits to our city. It promotes economic growth and job creation, uplifts diversity, equity, and inclusion, and inspires our young people to find their place as the next generation of arts leaders in our city. Impactful workforce development programs today mean a strong cultural workforce tomorrow that represents the true diversity of our amazing city. Thank you for your attention and consideration.

Please contact Julius Stone at [jstone@partnershipwithchildren.org](mailto:jstone@partnershipwithchildren.org) with any questions regarding this testimony.



Testimony of

**The Legal Aid Society, Coalition for the Homeless, Community Service Society of NY and  
Voices Of Community Activist and Leaders**

on

Oversight - Administration of CityFHEPS before the New York City Council  
Committee on General Welfare.

January 27, 2025

The Legal Aid Society (“LAS”), Coalition for the Homeless (“Coalition”), Community Service Society of NY (“CSS”) and Voices Of Community Activist and Leaders (“VOCAL-NY”) welcome this opportunity to testify before the New York City Council’s Committee on General Welfare regarding oversight of the administration of the City Fighting Homelessness and Eviction Prevention Supplement (“CityFHEPS”) rental assistance program.

First, we want to thank the City Council for securing the additional \$215 million allocated to expand the CityFHEPS voucher program as part of the City of Yes legislation. We especially appreciate the Council’s commitment to ensuring that any housing plan moving forward does not leave vulnerable populations behind—whether they are families facing eviction, individuals with disabilities, or elderly New Yorkers struggling to stay housed. We look forward to continuing to work closely with the City Council to ensure this funding is used to its fullest potential. We are committed to working together to make sure that these resources not only reduce homelessness but also provide the lasting stability that families need to thrive and build a better future.

Legal Aid, the Coalition and CSS have repeatedly encouraged the City and State to address the root cause of homelessness – the lack of affordable housing – through proven-effective policies, including housing vouchers and subsidies.

The CityFHEPS program, designed to provide critical financial assistance to prevent homelessness and promote housing stability for vulnerable households, has not met its promise. Despite its well-intentioned goals, the program has been plagued by shortcomings that hinder its effectiveness. This includes significant delays in processing, inefficiencies, inadequate support services, burdensome eligibility criteria, administrative challenges, insufficient communication between agencies, and rental assistance limits that fall short of covering actual housing costs. As a result, many needy households continue to face barriers to accessing the help they need, leaving them at risk of homelessness despite qualifying for assistance under the program.

The issues plaguing the CityFHEPS program are not new; they have persisted for years. The program's flaws have been well-documented over time, repeatedly flagged by auditors, elected officials, and other stakeholders. Yet, meaningful reforms and solutions have been slow to materialize. The persistent failure highlights a longstanding inability to effectively administer the program, leaving vulnerable households without the stability and support they desperately need. The continued recurrence of these problems raises serious concerns about the city's commitment to resolving them and fulfilling the program's promise of preventing homelessness and ensuring long-term housing security for those who qualify.

The story of “N.” illustrates how households in shelter are failed by inadequate administrative infrastructure, complex eligibility requirements and a lack of coordination between agencies. Before giving birth on Christmas Day, N. was employed and earning a steady income that would have met the CityFHEPS work and income requirements. Shelter staff verbally informed her that she could receive a CityFHEPS shopping letter. Since giving birth, N. stopped working and is currently receiving short-term disability benefits. After these benefits are exhausted, she plans to access New York State's Paid Family Leave for 12 weeks, a benefit available to all new parents. However, shelter staff have told her that short-term disability does not meet the work requirements for CityFHEPS and that they cannot assist her until she provides proof of employment income. This situation could force her to seek employment during a vulnerable time in her life, instead of focusing on recovery and bonding with her newborn. While it's possible N. does not meet the work requirement, CityFHEPS guidelines allow the Department of Social Services (“DSS”) Commissioner to waive the requirement “for good cause” when a household has a consistent work history but has temporarily lost work hours due to circumstances such as childbirth. N. has not received a denial notice. Instead, she is relying on shelter staff to accurately input her information into the Department of Homeless Services (“DHS”)/Human Resources Administration (“HRA”) system, with no proof that this is being done correctly. As a result, the burden now falls on her— a

new mother—to navigate the social services network and advocate for herself, with no official documentation to support her assertions other than her recollection of conversations with staff. This case highlights the urgent need for reform to ensure that vulnerable households receive the support they are entitled to, without unnecessary barriers or delays.

### Recent Amendments to CityFHEPS

In December 2022, HRA proposed amendments to the CityFHEPS program rules aimed at improving accessibility and affordability for CityFHEPS tenants. Key changes include: making single adults earning minimum wage full-time eligible, even if their income exceeds 200% of the federal poverty level; reducing the monthly contribution for tenants in single-room occupancy units to a maximum of \$50; lowering the required work hours for households from 30 to 14 hours per week for eligibility; allowing voucher-holders to pay up to 40% of their income for apartments above the CityFHEPS maximum; expanding SSI eligibility to include any household member, not just adults; and giving the Commissioner the discretion to set the maximum room rental rate in consultation with the NYC Office of Management and Budget (“OMB”).<sup>1</sup> Later, in August 2023, HRA proposed further amendments to the CityFHEPS program rules that would, among other things, eliminate the 90-day length of stay requirement for single adults and families,<sup>2</sup> decrease the required weekly work hours for a household with minor children from 14 to 10 and require single adult households to work at least 10 hours per week.<sup>3</sup>

While we welcomed any attempts to improve the voucher program, the proposed rules ran the risk of leaving some of New York City’s most under-resourced households behind. Thus, we cautioned that the rule allowing voucher-holders to choose an apartment that rents above the CityFHEPS maximum and pay up to 40 percent of their income, would dangerously set some households up for failure since the rule appears to require tenants to pay, on top of their 30 percent rent share, any amount that exceeds the payment standard *minus* the utility allowance. Section 8 households with income outside of public assistance may also rent apartments above the payment standard as long as their payment of both rent and utilities will not exceed 40 percent of their income. First, this puts CityFHEPS tenants at a significant disadvantage compared with Section 8 tenants, which allows Section 8 tenants to rent an apartment for up to the full payment standard while generally capping the family contribution at 30 percent of income. Second, 68 RCNY § 10-06(b)(1) leaves open the possibility that HRA could approve rentals where tenants pay 40 percent of their income toward rent without receiving any discount or credit off their portion of rent for utilities. The failure to account for utilities could leave a family on a fixed income paying 50 percent or more of their income toward rent and utilities combined making the household severely rent burdened.

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<sup>1</sup> NEW YORK CITY HUMAN RESOURCES ADMINISTRATION Notice of Public Hearing and Opportunity to Comment on Proposed Rule <https://www.nyc.gov/assets/hra/downloads/pdf/hra-proposed-rule-and-certifications-20221201.pdf>

<sup>2</sup> By this time, the Council already passed Local Law of 100 of 2023 which codified the end of the 90-day rule that required clients to remain in DHS shelters consecutively for three months before becoming eligible for CityFHEPS. It also repealed shelter residency requirements for youth in foster care (§ 21-145.1) and runaway and homeless youth (§ 21-145.2). Finally, it expanded the eligibility period duration.

<sup>3</sup> Contrary to Local Law of 2023 which removed employment status as a basis for eligibility.



We also urged HRA to strengthen their decision to cap rents for individuals residing in Single-Room Occupancy (“SRO”) housing at \$50 by offering SRO residents (and all residents) *a credit toward their utilities each month* and a Utility Assistance Payment (“UAP,” i.e., a cash credit for utility payments),<sup>4</sup> since such tenants subsisting on public assistance alone need additional assistance to help cover the rising cost of utilities and keep the lights on.

Additionally, we requested changes that would expand CityFHEPS eligibility to unsheltered and homeless youth, including those receiving services through the Department of Youth and Community Development (“DYCD”). Specifically, we urged expanding what constitutes “city administered facilities” and revising the definition of “Street homeless” to include providers that interact with unsheltered and homeless youth in New York City in order to expand CityFHEPS eligibility to unsheltered and homeless youth.

The regulations described above did not address the deeper, long-standing administration issues that continue to plague the program and did not go far enough to ensure fairness, particularly when it comes to utility costs and the inclusion of at-risk youth. Consequently, the program continues to be plagued by numerous failures and shortcomings. They include:

1. **Inadequate Administrative Infrastructure:** DHS has insufficient administrative systems and resources to effectively process applications and manage the CityFHEPS program. Access to the program, intended to help the most vulnerable, requires intense perseverance on the part of applicants to push through the barriers to entry. The lack of robust systems results in delays and inefficiencies, preventing timely assistance for eligible households. The City must adopt more streamlined procedures that would reduce delays and ensure timely assistance for eligible households.
2. **Lack of Coordination Between Agencies:** Another issue is the lack of coordination between the various agencies involved in homelessness services and housing assistance. This fragmentation results in delays, confusion, and missed opportunities to assist eligible households. Clients also experience changes in household composition, or move between different parts of the shelter systems. Because eligibility criteria shift between systems, clients lose access to subsidies. Improved coordination between the agencies involved in the CityFHEPS program would reduce confusion for applicant households and create a more seamless experience for those seeking assistance.

Clients in the community at risk of entering shelter have to connect with their nearest

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<sup>4</sup> <https://www.nyc.gov/assets/hpd/downloads/pdfs/services/section-8-briefing-book-abridged.pdf> p.28

Homebase provider in order to apply for CityFHEPS. The non-profit Homebase providers are understaffed, often having 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. One family living in shelter who is working with the Coalition finally found an apartment but needs an appointment with Homebase to begin the lease-up process; the soonest appointment they could receive is for April. Additionally, each Homebase operates differently. There does not seem to be a common intake process; that is, clients who visit a Homebase in Queens may have a completely different experience from clients who visit a Homebase in The Bronx. Unfortunately, they all share extraordinary wait times in common.

3. **Complex Eligibility and Documentation Requirements:** The Comptroller Audit notes that the complex and sometimes unclear eligibility criteria, along with burdensome documentation requirements, create barriers for many households. When applying, households struggle to provide the required documents. Often, the full process is not clearly explained. This leads to unnecessary delays and rejections. A family residing in shelter cannot apply directly for CityFHEPS. Instead, they must rely on shelter staff to have their correct information in the DHS system and to distill the labyrinthic rules of the program. The bureaucracy involved in the process is a significant obstacle for vulnerable populations. By reducing the complexity of the application process and making the requirements more transparent and accessible, the City could increase the likelihood that households will successfully apply for and receive assistance in a timely manner. It is also problematic that a household whose application is denied is not issued a written notice of denial that explains the nature of the denial, especially since denials are often based on incorrect household information or other human error.
4. **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.
5. **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 City FHEPS.

- 6. Inadequate Program Oversight and Monitoring:** Another contributing factor to the failures of CityFHEPS is the lack of effective oversight and monitoring mechanisms. Inadequate tracking and evaluation of the program's performance makes it difficult to identify and address issues in a timely manner. The City should implement stronger oversight mechanisms to monitor the CityFHEPS program's performance such as tracking outcomes more effectively, conducting regular evaluations, and taking corrective action when issues arise. Improved oversight would help ensure that the program meets its goals and serves the needs of eligible households.

These systemic issues hinder the program from meeting its goals of preventing homelessness and moving eligible households from shelter to stable housing. Vulnerable people still struggle unnecessarily to access rental assistance. Without addressing the fundamental systemic failures outlined above, the program remains ineffective. Furthermore, while the City introduced provisions like allowing voucher holders to pay a higher portion of their income toward rent, this does little to solve the core problem of low rental caps that fail to meet the real cost of housing in high-demand areas. The reforms, though a step in the right direction, have not translated into meaningful improvements, and the CityFHEPS program continues to fall short of its promise to prevent homelessness and provide stable housing for those in need.

The October 2024 Office of the New York State Comptroller audit of CityFHEPS (“Comptroller Audit”) chronicles these shortcomings.<sup>5</sup> To little surprise, the report cited 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 highlighted 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.

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<sup>5</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>

## **Recommendations**

The City must do the following to ensure that households are able to transition from shelter into safe housing and that New Yorkers facing eviction are able to stay in their homes and avoid homelessness:

### **1) Implement the CityFHEPS Reform Laws**

In the summer of 2023, the City Council passed four laws expanding CityFHEPS eligibility criteria and making other program improvements designed to combat the grave threat that homelessness and housing insecurity pose to New York City households. In developing this package of legislation, the Council listened to extensive live testimony from a wide range of expert stakeholders and reviewed hundreds of pages of written testimony, including statistical analyses.

The duly enacted laws: increased the income eligibility criteria for applicant households to 50% of the area median income from 200% of the federal poverty level (see Local Laws 100, 102); for households residing in a shelter, eliminated the 90-day shelter residency requirement (see Local Law 100); removed the requirement that a household be currently or previously living in a DHS shelter to qualify for help (see Local Laws 100, 101); eliminated the weekly work requirements for voucher eligibility (see Local Law 102); and prohibited DSS from deducting a utility allowance from the maximum rental allowance for a CityFHEPS voucher (see Local Law 99).

Unfortunately, save for the 90-day shelter requirement, the Mayor and DSS have refused to implement these critical program changes. As a result, every single day New York City households eligible for CityFHEPS under the reform laws are evicted from (often longtime) low-rent apartments and enter our overcrowded shelter system, and households languishing in shelter are denied access to CityFHEPS because they earn too much, despite still qualifying as low income. HRA should take immediate action to implement the CityFHEPS reform laws.

### **2) Target High-Risk Households for CityFHEPS Expansion to Maximize Impact**

We commend the additional \$215 million allocated for expanding the CityFHEPS voucher program, a significant step secured through the City of Yes legislation.<sup>6</sup> While this funding may not cover all households at risk of eviction, it has the potential to significantly reduce homelessness and help low-income households remain in their homes. To maximize its impact, we recommend prioritizing households facing eviction in Housing Court, living in rent-regulated housing, and those with elderly, disabled, or minor children members. Additionally, targeting households earning 200% or less of the poverty line, paying rent at or below CityFHEPS limits, and using the voucher to stay in

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<sup>6</sup> Council Land Use Committees Vote on Comprehensive Housing Plan for City to Modify Zoning for Housing Opportunity with Commitments to City for All Investments into Communities <https://council.nyc.gov/press/2024/11/21/2752/>

their current home would help prevent eviction and homelessness, both of which are more costly to address in the long term.

### 3) Expand Eligibility Pool

**a) Elderly and disabled tenants:** As per the Community Service Society’s analysis of the 2017 Housing Vacancy Survey (“HVS”), there are 9,463 rent-regulated apartments with low-income tenants who are severely rent-burdened and have a head of household over the age of 65. However, these households, some of which rely on public assistance, do not currently qualify for CityFHEPS. Demonstrating a continuation of this trend, the 2023 HVS further indicates that more than 38 percent of households with disabled or elderly family members are severely rent-burdened.<sup>7</sup> While all such households should qualify for vouchers, creating even just 5,000 vouchers for rent-regulated seniors and people with disabilities already living in the community would reduce homelessness, preserve affordable housing, and maintain community stability.

**b) Non-citizens:** Local law grants New York City the authority to offer CityFHEPS to all residents, irrespective of their immigration status. However, at present, only those non-citizens who are eligible for cash assistance seem to be receiving the subsidy. No household should be excluded from CityFHEPS based on immigration status. Non-citizen households are often the most in need of support. Even when some members of a mixed-status family qualify for CityFHEPS, the subsidy is typically too small to make permanent housing affordable. The penalty that affects these mixed-status households must be eliminated.

**c) Homeless and unsheltered youth:** HRA should make unsheltered and homeless youth and young adults, including those receiving services through the DYCD categorically eligible for CityFHEPS vouchers without having first to enter the DHS shelter system. Many unsheltered young people interact with services other than DHS, including: DYCD-funded outreach providers, NYS Office of Mental Health Safe Options Support (SOS) outreach providers, federally funded outreach providers, Port Authority, MTA, and others. Despite the previous administration initially promising youth in the DYCD system access to vouchers by the end of 2017 in its report, “Turning the Tide on Homelessness in New York City” this promise was not kept.<sup>8</sup> In an attempt to finally give youth in the DYCD system access to CityFHEPS vouchers, City Council successfully passed Intros 2405-A and 148-B in 2021, and Local Laws 170 and 157 went into effect in April of 2022. Despite the clear intent of the Council when Local Laws 170 and 157 were passed, DSS interpreted them to require youth experiencing homelessness in the DYCD-funded RHY programs as well as youth transitioning out of Administration for Children’s Services (ACS) care to enter DHS shelter to be eligible for CityFHEPS, thus depriving these young people of equal access to CityFHEPS vouchers. When it passed the larger package of bills to strengthen the CityFHEPS program that became law in February of 2024, it once again included youth in DYCD-funded RHY programs and ACS custody by

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<sup>7</sup> <https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023%20NYCHVS%20Selected%20Initial%20Findings.pdf>

<sup>8</sup> <https://www.nyc.gov/assets/dhs/downloads/pdf/turning-the-tide-on-homelessness.pdf>

removing the requirement that the applicant be currently or previously living in DHS shelter to qualify. The current administration's refusal to implement those laws leaves youth and young adults experiencing homelessness in the DYCD RHY system without any access to subsidized housing.

Unsheltered young people and adults should not be deemed ineligible for CityFHEPS because they sought support from non-DHS outreach staff. DSS needs to uphold Local Laws 157 and 170 of 2022 as the community and council intended, and grant youth experiencing homelessness in DYCD-funded RHY programs as well as youth transitioning out of ACS care, who are otherwise eligible, access to HRA-funded CityFHEPS vouchers without forcing them to enter a DHS shelter.

#### **4) Facilitate Access to Safe Housing in Areas of Opportunity and Successful Participation**

**a) Adopt the Exception Payment Standard:** For both CityFHEPS rooms and apartments, HRA should adopt the "Exception Payment Standard" ("EPS") used by the NYC Department of Housing Preservation and Development ("HPD"), NYC Housing Authority ("NYCHA") and the Emergency Housing Voucher program or the maximum amount of subsidy HRA will pay for an apartment that matches the local market.<sup>9</sup> The EPS allows those with rental subsidies to enter markets from which they have been historically excluded. Not only does the EPS open additional housing options to those with rental subsidies, but it allows households to reside in high-opportunity areas close to desirable amenities such as hospitals, public transportation, high-quality schools and childcare, and parks and other greenspaces. Currently, the HPD Section 8 program and NYCHA use the EPS. In addition, like HPD, HRA should publish their CityFHEPS payment standards each year in advance of January 1<sup>st</sup>.

**b) Combat Source of Income Discrimination:** Despite clear prohibitions against voucher discrimination under both the City and State Human Rights Laws, source of income discrimination remains widespread. Unfortunately, homeless New Yorkers continue to face persistent rejections or receive no responses at all from brokers and landlords due to their use of vouchers. The lack of government response harms households trying to escape shelters, forcing them into substandard housing located far from areas of greater opportunity. There is an urgent need for a genuine governmental commitment to addressing this issue and sending a strong message to the real estate industry that such discriminatory practices will not be tolerated. While the Mayor's June 2022 housing plan pledged a "coordinated enforcement and outreach effort" to combat source-of-income discrimination, its execution has been vague and lacking in detail.<sup>10</sup> 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>11</sup> The lack of clear execution and the failure to distribute

<sup>9</sup> HPD 2024 Payment Standard and Exception Payment Standard <https://www.nyc.gov/assets/hpd/downloads/pdfs/services/ps-and-eps-values.pdf>

<sup>10</sup> Housing Our Neighbors: A Blueprint for Housing and Homelessness <https://www.nyc.gov/assets/home/downloads/pdf/office-of-the-mayor/2022/Housing-Blueprint.pdf>

<sup>11</sup> <https://gothamist.com/news/after-touting-3m-housing-discrimination-crackdown-nyc-has-yet-to-issue-the-funds>

promised funds reflect a lack of urgency and effective action to combat source of income discrimination, leaving vulnerable populations without the support they need. The City should adequately fund CCHR's source of income discrimination unit both to prosecute discriminatory activity as well as to engage in early interventions to ensure housing unstable and homeless New Yorkers can secure apartments.

Additionally, the Mayor's Public Engagement Unit ("PEU") should expand its focus to include assisting prospective tenants who experience discrimination. While not directly involved in finding apartments, the PEU provides crucial support by connecting individuals with affordable housing programs, such as the NYC Housing Connect portal, and by offering resources for housing assistance and eviction prevention. It also ensures that people from marginalized groups—such as immigrants, low-income households, and those with limited English proficiency—can access housing opportunities through multilingual services and in-person workshops. Additionally, the PEU partners with community-based organizations to provide outreach and case management, helping people apply for housing lotteries and access legal or financial assistance when facing eviction. Given the complexities of the housing process, particularly in a city as large as New York, PEU should expand its outreach efforts, including more targeted education on the housing lottery system and increased support for vulnerable populations, to ensure that all residents, regardless of background, have equitable access to affordable housing opportunities. Additionally, there should be a clear pathway for immediately connecting tenants who face discrimination to CCHR, to ensure that tenants' rights are upheld and they can access the housing they are entitled to.

**c) Eliminate the Rent Reasonableness Rule:** The rent reasonableness rule prevents CityFHEPS voucher holders from accessing apartments that meet the established payment standard, and its implementation creates uncertainty even when a tenant has found a potential home. Shelter residents seeking apartments can never know in advance whether a unit they have found will be considered "reasonable," even if the rent is at or below the payment standard. These New Yorkers undergo the arduous rental application process and then wait weeks or months only to learn that the rent was rejected as "not reasonable," and they have to restart their search. Further, tenants in eviction cases who rely on CityFHEPS to retain their current apartments cannot predict what rent HRA will approve, and therefore cannot agree to a specific rent obligation as required by Housing Court settlement agreements. The City Council should ensure tenants are not unfairly prevented from renting apartments at or below the full payment standard because of the rent reasonableness requirement.

**d) Ensure Access to Utility Benefits:** HRA adopted a rule that provides for a reduction in the tenant share to cover utilities, meaning that some tenants are now receiving a direct check for the difference in utility costs, provided they submit the required utility form. This change aligns the program with Section 8's utility allowance scheme. However, households receiving CityFHEPS assistance are not prompted to submit this form, creating a gap in access to the benefit. Renewal

applications for these households should include the utility form, along with information about the benefit, to ensure they do not miss out. For those receiving cash assistance, the small monthly HEA and SHEA allowances are subtracted from the payment to the tenant, rather than providing the full utility deduction to the tenant or the utility company. While HRA can pay the utility deduction directly to the utility company, the current utility form does not offer an option to facilitate this payment method. This is particularly problematic for clients who mail money orders instead of paying online, as they are responsible for covering the mailing costs. It is recommended that the utility form be updated to allow for direct payments to the utility companies, easing the burden on clients and ensuring they do not have to incur mailing costs.

### **5) Eliminate Processing Backlogs and Fix the Delays that Cause Missed Opportunity**

The rampant source of income discrimination tenants with rental assistance vouchers face can sometimes be attributed to the extreme delays associated with CityFHEPS paperwork, inspections, and check issuance. These delays are both well-documented and commonplace.

Even after a landlord agrees to rent an apartment, New Yorkers regularly wait for up to six months in shelter while the City evaluates their applications. Voucher holders navigate a byzantine lease-up process in which the smallest error – a misspelled address or a typo in transcribing a broker’s license number – causes weeks or months of delays, often leading to the loss of a housing opportunity. Meanwhile, the collateral effects of homelessness – joblessness, mental health challenges, familial instability, and poor living conditions – compound.

Unless HRA adopts affirmative regulations to change the lease-up process, CityFHEPS will not serve its purpose of allowing New Yorkers to escape the shelter system and live in homes with dignity. The following changes will significantly reduce CityFHEPS delays:

#### **a) Streamlining the review process:**

- Requiring DSS reviewers to review an entire package for mistakes before sending it back to the shelter provider for corrections;
- Reducing the amount of paperwork required for lease-up, including the requirement of obtaining multiple leases from the landlord;
- Make application packet forms readable/fillable PDF forms that can be signed electronically and emailed back, while still allowing for a paper process for those unable to electronically process;
- Have re-housing staff fill out portions of the pre-clearance application relating to the Fire Department and Department of Buildings, which require specialized knowledge to complete.
- Requiring DSS reviewers to correct and approve packages with minor clerical errors, like an address that says “street” instead of “place”;



- Streamline the documentation process for landlords who have previously successfully leased to CityFHEPS tenants. Specifically, for large-scale properties such as Housing Connect buildings with hundreds of units, documentation requirements should be simplified for each new lease-up. Instead of requiring the same documentation for every unit, pre-clearance and approval should be transferred between units, particularly in new buildings where the landlord is already familiar with the program's requirements;
- Recertification of CityFHEPS eligibility should be processed within two (2) weeks of expiration and if the recertification has not been processed by DSS in a timely manner at no fault of the tenant, then the rental assistance should continue at the same rate until DSS issues a final determination. Currently, this process can take months, and in some cases recertification is not completed at all, leading to evictions for unpaid rent;
- Providing automatic email notifications with package updates;
- Community based organizations should be permitted to process CityFHEPS applications instead of having to go to a Homebase provider. Expanding access points for individuals to complete their applications would address capacity issues with CityFHEPS application processing and help avoid backlogs and delays;
- DSS should process shelter resident CityFHEPS applications in parallel with property management companies conducting income eligibility verification for affordable housing units. Currently, DSS waits until the household is verified as income eligible for a specific affordable housing unit before processing their CityFHEPS application. Processing both verifications together would save time for shelter households;
- Applicants that are denied assistance should receive a notice of determination that explains the nature of the denial and informs them of their options, including any applicable deadlines.

b) **Setting clear benchmarks for approving CityFHEPS packages:** DSS should approve all applications within 15 days and ensure that staff meets those goals in facilitating moves; and

c) **Re-training shelter staff:** DSS should track how long the contracted shelter providers take to facilitate move-outs. DSS must intensively re-train the shelter providers that have the most repeated delays in the lease-up process. Further, caseload limits should be established for housing providers to ensure better service delivery. One of the primary concerns is that clients are unable to reach their housing specialists to discuss eligibility or apartment options. Additionally, high turnover rates and a lack of specialized knowledge among staff make it difficult to effectively manage unusual or complex situations. Setting caseload caps would help address these issues by allowing providers to give more focused attention to each client.

## **Conclusion**

We thank the General Welfare Committee for the opportunity to testify about the state of the CityFHEPS program, and for the Council's dedication to addressing New York City's mass homelessness crisis.

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## **About The Legal Aid Society**

The Legal Aid Society ("LAS"), the nation's oldest and largest not-for-profit legal services organization, is more than a law firm for clients who cannot afford to pay for counsel. It is an indispensable component of the legal, social, and economic fabric of New York City – passionately advocating for low-income individuals and families across a variety of civil, criminal, and juvenile rights matters, while also fighting for legal reform. This dedication to justice for all New Yorkers continues during the COVID-19 pandemic.

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

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

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 300,000 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. 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 Patterson Belknap Webb & Tyler, LLC, was counsel *C.W. v. City of New York*, a federal class action lawsuit on behalf of runaway and homeless youth in New York City. LAS, along with institutional plaintiffs Coalition for the Homeless and Center for Independence of the Disabled-NY (“CIDNY”), settled *Butler v. City of New York* on behalf of all disabled New Yorkers experiencing homelessness. Also, during the pandemic, The Legal Aid Society along with Coalition for the Homeless continued to support homeless New Yorkers through litigation, including *E.G. v. City of New York*, Federal class action litigation initiated to ensure WiFi 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.

### **About 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 11 direct-services programs that offer vital services to homeless, at-risk, and low-income New Yorkers. These programs also demonstrate effective, long-term, scalable solutions and include: permanent housing for formerly homeless families and individuals living with HIV/AIDS; job-training for homeless and low-income women; and permanent housing for formerly homeless families and individuals. Our summer sleep-away camp and after-school program help hundreds of homeless children each year. The Coalition’s mobile soup kitchen distributed nearly 400,000 hot, nutritious meals to homeless and hungry people on the streets of the city this past year – up from our usual 320,000. 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. In response to the pandemic, we are 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 court-appointed independent monitor of municipal shelters for homeless single adults, and the City has also authorized the Coalition to monitor the municipal shelter system 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 LAS 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 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.

### **About the Community Service Society of NY**

The Community Service Society of New York (CSS) has worked with and for New Yorkers since 1843 to promote economic opportunity and champion an equitable city and state. Through a strategic combination of data-driven research, direct services, and people-driven advocacy, we ensure New Yorkers have the power to create change in their lives and the life of our city and state. Our programs, policy analysis, legal advocacy, and campaigns expand access to health care, safe and affordable housing, employment, opportunities for individuals with conviction histories, consumer debt assistance, and more—making a tangible difference in the lives of millions.

We focus on issues that touch every facet of life in New York so that every New Yorker has the power to create change in their own lives—and the life of our city and state. CSS links people to immediate opportunities in higher education, health care coverage, living wage jobs, debt assistance, housing, and legal support while fighting long-term for more equitable systems. New Yorkers turn to us for urgent support, and we also channel their aspirations into policy and advocacy efforts that address the root causes of economic insecurity. All of the work we do in research, services, and advocacy is interconnected. Insights from one area of work inform others, ensuring our approach is

both all-encompassing and effective in making New Yorkers' lives better today and tomorrow.

We power multifaceted advocacy efforts with tenant leaders to prevent evictions and make housing more affordable. Our research and advocacy have been central to achieving important wins for New York tenants, including a right to free counsel for households facing eviction and a stronger system of rent laws that help keep people in their homes. We also equip social service providers with up-to-date, actionable information on affordable housing resources for their clients.

CSS is one of the nation's first and most impactful charitable organizations. Since our founding in 1843, we've helped generations of New Yorkers live in safe, affordable housing; pioneered the social work and public health fields; and championed America's first public social welfare programs, including the forerunner to Social Security. Our track record of innovation and our commitment to equity continues to this day.

#### **About Voices Of Community Activists & Leaders (VOCAL-NY)**

Voices Of Community Activists & Leaders (VOCAL-NY) is a statewide grassroots membership organization that builds power among low-income people affected by HIV/AIDS, the drug war, mass incarceration, and homelessness in order to create healthy and just communities. We accomplish this through community organizing, leadership development, advocacy, direct services, participatory research and direct action. VOCAL-NY is building a movement of low-income people dedicated to ending the AIDS epidemic, the war on drugs, mass incarceration, and homelessness. We fight for systemic change rooted in justice, compassion, and love. We approach this work with a firm belief in reducing harm and ending stigma, and the knowledge that the issues impacting our communities are driven by institutional oppression, not personal failings. Our campaigns have saved or improved the lives of hundreds of thousands of New Yorkers across the state.



**Testimony**

**New York City Council**

**Committee on General Welfare**

**Oversight Hearing on the Administration of CityFHEPS**

**Monday, January 27, 2025**

Good afternoon, Chair Ayala and members of the Committee. My name is Cristina Abbattista, and I am the Policy Analyst at Urban Pathways. Thank you for the opportunity to testify at today's oversight hearing on the Administration of CityFHEPS.

Urban Pathways is a nonprofit homeless services and supportive housing provider. Last year, we served over 2,500 single adults through a full continuum of services that includes street outreach, drop-in services, Safe Havens, extended-stay residences, and Permanent Supportive Housing. We also offer a range of additional programming to meet the needs of the people we serve, including our Total Wellness, Employment, and Consumer Advocacy Programs.

I am here today to urge the City to act on an array of administrative issues that are preventing eligible individuals from using CityFHEPS vouchers to move into permanent housing. As the City's housing crisis persists and policymakers continue to rely on voucher programs as a tool to access housing, it is essential that CityFHEPS operates in a way that puts voucher holders on a level playing field with all other apartment seekers.

The CityFHEPS voucher program fails to realize its full potential as a pivotal tool to combat homelessness due to a bureaucratic process that lacks clarity and efficiency, requiring eligible individuals and voucher holders to be their own advocate in receiving and utilizing vouchers. Concrete timelines and guidelines, increased accountability and responsiveness, and streamlined processes are essential in addressing the persistent barriers within the administration of the CityFHEPS voucher.

As it stands, there is no set standard for how long it should take to complete an application from start to finish. The City Council must expedite CityFHEPS applications by committing to a 15-day maximum turnaround from finding an apartment to approval to ensure that voucher holders can retain permanent housing prospects. Many voucher holders lose apartments due to the lengthy process that must be completed before an apartment can be approved and checks can be cut. Most landlords are unwilling to hold an apartment beyond this time frame, which mirrors the private sector application timeline. Losing an apartment to bureaucratic processes is unfair to the apartment seeker, who often applies for numerous apartments before finding one that will accept them.

The process of leasing an apartment with a CityFHEPS voucher is opaque and inefficient, creating a sense of hopelessness for the people we serve. To remedy this, the City Council must require the creation of an accessible voucher holder checklist that clearly communicates all the necessary paperwork to the recipient. This should be universally accessible and available in all languages via AccessHRA. This will decrease the chances of incomplete or incorrect applications and increase voucher-holder confidence.

Source of Income (SOI) Discrimination is rampant city-wide and is the biggest challenge the people served by Urban Pathways face when searching for an apartment. SOI discrimination leads to extended stays in our safe havens, stabilization beds, and drop-in centers. The City must develop and implement 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. The City should also require an annual public reporting on SOI complaints and the average time it takes to resolve a complaint.

Thank you for holding this oversight hearing and for the opportunity to testify today. I look forward to continuing to partner with the City Council to ensure the CityFHEPS voucher is as effective as possible, and that all New Yorkers can access affordable and safe housing.

**For questions or more information, please contact:**

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## New York City Council Testimony on CityFHEPS

January 27, 2025

### CityFHEPS Vouchers in NYC

The CityFHEPS program is New York City's primary rental assistance initiative, designed to help individuals and families transition from homelessness to permanent housing. Since its launch in 2018, the program has processed 41,563 cases, assisting 87,588 individuals in securing permanent housing.

### Veterans Needing Housing in NYC

There are approximately 700 veterans in New York City experiencing homelessness compared to just 480 two years ago. While migrants get keys to the city in hotel rooms, veterans are sleeping on the streets and in subways because DHS shelters are just too violent for us. I spent 5 months in fear from violent sex offenders and gang members.

### HUD-VASH Vouchers in NYC

The HUD-Veterans Affairs Supportive Housing (HUD-VASH) program combines Section 8 rental assistance with case management and supportive services from the Department of Veterans Affairs (VA). In September 2023, HUD and the VA awarded \$16.1 million in new HUD-VASH vouchers to 71 public housing agencies, including those in New York City. In the last 7 years, just 272 HUD/VASH vouchers have been issued and there have been no efforts to expand that number after VA Homeless Director Karen Fuller told the Veterans Task Force none were needed. I disagree. My experience was I was told there weren't vouchers available for me and it took months to process the voucher, which denied a move-in letter and any financial incentives for myself or my supportive housing program.

### Cost to Shelter Homeless vs. Housing Them

Providing permanent supportive housing is often more cost-effective than maintaining individuals in shelters. For instance, a study in Central Florida found that the annual cost per person for permanent supportive housing is about \$25,000 a year, compared to \$50,000 for a single adult male. As we have seen in Borden Ave Veterans Residence, DHS officials are kicking VA-eligible veterans to the streets and other non-veteran shelters while still collecting both Veterans Affairs funding and city funding, or double-dipping.

### Recommendations

- **Allow Veterans to Have Their Own CityFHEPS Vouchers program:** Enabling veterans to access CityFHEPS vouchers as a bridge while HUD/VASH vouchers are processed.
- **Allow CityFHEPS Case Managers to Process HUD-VASH Vouchers:** Integrating the processing of HUD-VASH vouchers into the CityFHEPS program caseworkers could streamline services and ensure veterans receive comprehensive support.
- **Address Incentives for DHS Caseworkers:** The Department of Investigation (DOI) has identified issues within the DHS, including lapses in communication and reporting, nepotism, oversight and violations of the bidding process. Caseworkers sit on processing of vouchers blaming veterans for being homeless and that it is "not their job" to facilitate housing. It is my opinion that in doing so would essentially put themselves out of work.
- **Utilize Shelter Residents for Repairs:** Implementing stipend-based work programs for shelter residents to perform maintenance and repairs can reduce costs and provide residents with valuable skills and a sense of purpose while providing a few dollars while in the shelter system.



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**Testimony submitted to the NYC Council Committee on General Welfare**  
**Oversight Hearing: Administration of CityFHEPS Rental Assistance Program**  
**January 27<sup>th</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 testify today.

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

**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, a DHS woman’s employment shelter, 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.

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 can attain and stabilize their permanent housing throughout the City. Through VOA-GNY’s Street to Home pilot program, the city and DHS creatively utilized CityFHEPS vouchers to quickly place people experiencing unsheltered homelessness into permanent supportive housing. While a core component of this pilot program is enhanced clinical support services to help rehoused individuals stabilize and begin to recover, DHS’ flexibility in processing the CityFHEPS paperwork after the person moved into housing enabled us to drastically shorten their time spent homeless. Given this success, we



have the following recommendations to streamline the CityFHEPS application and lease up process:

### **Reduce Documentation requirements for lease signings whenever possible**

Rules for local subsidies like CityFHEPS are entirely in the City's Department of Social Services' control, yet our team often struggled to meet strict documentation requirements to get leases executed. An active or single-issue Public Assistance (PA) case is a CityFHEPS requirement, and our staff report that the largest obstacle to timely submission is satisfying Public Assistance requirements to have birth certificates and photo identification for each applicant. These requirements are particularly challenging for persons born outside of New York, as other jurisdictions make obtaining new copies of documents challenging, especially for foreign born persons. Specifically, we recommend:

- Expedite Public Assistance case openings by waiving birth certificate requirements for persons born outside of New York State but who can otherwise prove their identity (this may require a waiver from OTDA)
- Allow VOA-GNY and other DHS contracted providers to create photo identification for persons without drivers' licenses or passports and/or provide expedited access to IDNYC appointments so applicants can satisfy photo id requirements for Public Assistance
- Assign HRA expeditors to quickly open Public Assistance cases, particularly single-issue cases for persons with income

### **Increase flexibility in the inspection and lease up process to streamline access to housing**

VOA-GNY's family shelter staff report that households have missed out on identified housing opportunities if they are required to undergo an HRA rebudget upon submission of a housing packet, to recalculate their client contribution for rent. While our shelter case managers proactively collect and submit our client paystubs to keep household income records up to date in DHS' system, hourly employees can see their monthly income fluctuate more than the \$100 limit which requires a Public Assistance rebudget.

- Do Public Assistance rebudgets post move-in for households well within CityFHEPS income limits, to expedite the lease-up process.
  - While a household's monthly contribution towards rent changes due to a PA rebudget, the total rent amount set in a lease is the same regardless of who pays, whether the voucher or the tenant.
- Allow inspections for units that are already occupied.
  - Upon the launch of Street to Home VOA-GNY had all of the units pre-inspected and cleared for lease-up to save time in the process. However, as time went on, those inspections expired and needed to be redone. While HRA worked with the



Street to Home team to waive the reinspection requirement on some units, in other cases, they deemed the new inspections necessary. For those units, inspectors insisted that to pass, the units had to be vacant even though per the program design, all of the units had a resident in occupancy. While we understand that this is not supposed to be the rule, it was our experience. Tenants should never be forced to pack their belongings post move in to get through an inspection process. Other rental assistance programs perform routine inspections with residents in place, CityFHEPS should be able to do so as well.

### **Expand staffing at HRA to more quickly process Public Benefits and Rental Assistance**

#### **Payments**

We urge the city to prioritize funding to expand HRA headcount to meet growing demands for public assistance and rental assistance. As the Administration previously testified before the General Welfare Committee, New York City has seen a marked increase in the number of households applying for Public Assistance. Likewise, HRA's Rental Assistance Processing (RAP) unit has issued thousands more monthly checks over the years, a testament to the successful efforts of DHS and HRA to help households access and maintain stable housing. Through sufficient headcount and sustainable caseloads, HRA can ensure timely access to public benefits and rental assistance for those who need it.

### **Fully Implement Local Laws 99 to 102 of 2023 immediately to expand access to CityFHEPS.**

VOA-GNY urges the administration to fully implement Local Laws 99 – 102 of 2023, passed by the City Council to strengthen the effectiveness of the CityFHEPS rental assistance program. This bill package will help more households abbreviate their time spent homeless as well as enable more tenants at risk of losing their housing to remain stably housed. In addition to fiscal savings which would be generated by fewer and shorter shelter stays, it cannot be overstated the personal and societal benefits of helping more people avoid and abbreviate the destabilizing and traumatizing experience of homelessness in New York City.

#### **Closing:**

We are grateful for the opportunity to testify 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 [elee@voa-gny.org](mailto:elee@voa-gny.org).



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

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Breaking the Cycle of Homelessness  
for Women and their Children

## **Testimony of Win on CityFHEPS Administrative Issues for the General Welfare Hearing January 27<sup>th</sup>, 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 services to families with children experiencing homelessness in New York City. We operate 16 shelters and nearly 500 supportive housing units across the five boroughs. Each night, nearly 7,000 people call Win “home,” including 3,800 children.

In 2024, New York City saw a record 130,000 people living in the shelter system on any given night. CityFHEPS, New York City’s rental assistance voucher, has the potential to play a pivotal role in ending New York City’s homelessness crisis. Unfortunately, a litany of administrative issues have undermined the program, making it far less effective than it could be. The challenges families face in using their vouchers stem from several factors, including the extremely competitive housing market and rampant landlord discrimination toward voucher recipients. However, administrative barriers — which the City of New York has the power to fix — are among the top issues Win families face. At almost every step in the CityFHEPS process, these administrative issues cause families to experience delays, ranging from several days to several weeks, needlessly prolonging shelter stays as the shelter census continues to balloon.

Win strongly believes in the potential of CityFHEPS, which is why we have been a leading voice in advocating for improvements since its inception in 2018. Sadly, many of the administrative fixes we are calling for today have remained unaddressed year after year. That’s why last year, Win partnered with The Real Estate Board of New York (REBNY) on a joint report [Housing More New Yorkers](#), which identified some of the worst administrative issues plaguing the CityFHEPS process along with common sense solutions. Today, I’ll be highlighting numerous administrative issues that remain unaddressed.

Unfortunately, the administrative issues with CityFHEPS start at the first step in the process. The issuing of shopping letters, the actual voucher that indicates a household’s maximum rental amount, is deeply dysfunctional. Although the 90 day rule is no longer in place, substantial delays in the issuance of the voucher are having a similar effect, forcing families to wait weeks or months before they can start their housing search. There is also no centralized system to upload pay stubs for clients whose eligibility depends on their employment. Housing coordinators must email pay stubs to the Department of Homeless Services (DHS), which introduces opportunities for human error and delays, as emails often go unanswered. Clients are left in the dark, unsure whether their documents have been received. In many cases, DHS employees don’t respond for so long that income documents are out of date and require a resubmission. To address this issue, clients should have the ability to upload pay stubs directly through a centralized portal, which would bypass the need for intermediaries and reduce the workload for housing coordinators. Additionally, after providing their initial income documents, clients should be able to simply verify that their income has not changed substantially, rather



Breaking the Cycle of Homelessness  
for Women and their Children

than requiring them to collect all new paperwork. DSS should also be able to use other means tested programs as a proxy for income eligibility such as SNAP for CityFHEPS recipients that qualify.

While some efforts have been made to modernize CityFHEPS, such as some processes being available through AccessHRA, critical functionalities remain absent in that system. Clients cannot apply for a shopping letter or submit new applications through the platform, despite its potential to streamline processes and increase transparency. With the passage of local law 118 in 2020, this functionality should already exist in AccessHRA or another platform, but sadly the City remains out of compliance with that law. The City must expedite the integration of all CityFHEPS functionalities into AccessHRA, including shopping letter applications and renewals. Moreover, an online portal within AccessHRA should be created to allow voucher holders and landlords to view the status of applications, fostering greater transparency and accessibility.

Additionally, the rollout of Current, the new CityFHEPS application system, has been disappointing as it is also lacking in core functionality. Significant issues include the inability to search for cases by name, requiring users to rely on lengthy WMS case numbers. Current also lacks a dashboard to view all assigned cases, forcing users to manually search for individual cases and their statuses. The Administration must prioritize the addition of a name-based search function and a user-friendly dashboard in Current. Automatic communication between Current and DHS should also be implemented to streamline re-budgeting and case updates. DSS has indicated that they plan to roll out an update to Current – Current 2.0, which is supposed to address some of these issues, but it is unclear when that update is expected and the specifics issues that will be fixed.

Delays in application review, inspections, and payments are all major issues that must be addressed. Although DSS has repeatedly stated that each step in the process typically happens within a reasonable timeframe, they have refused to commit to a standardized timeframe for each step. To ensure that applications are being processed, inspections are being conducted, and payments are being issued on time the City Council should pass legislation that sets concrete time requirements. For instance, the City Council should pass a local law requiring that, upon submission of a tenant-based rental assistance application, the administering agency inform the applicant of the determination of approval no more than 15 days after submission. Additionally, the Council should pass a local law mandating that the pre-clearance and walkthrough of a housing unit be conducted within seven days of the unit being located. Finally, the Council should enact a local law requiring the administering agency to provide landlords with rental assistance payments within five days of the scheduled payment date. This should also include an electronic payment option to ensure timely and reliable transactions. By requiring these standardized timeframes, the City would be placing voucher holders on an equal footing with all other prospective tenants. For the city to meet these timeframes, DSS also needs to be properly staffed, which is why the City must allocate additional staff to DSS units responsible for processing CityFHEPS.



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The inspection process for CityFHEPS units is another area ripe for reform. Although inspections are a critical step in the process that are absolutely necessary to ensure apartments are safe and high quality, there is room for improvement. The City should categorizing inspection issues into two levels: significant risks to health and safety, such as lack of a fire escape or heat source, which would require a full re-inspection; and lower-risk issues, such as missing outlet covers or insufficient lighting, which could be resolved either on the spot or through photo or video proof submitted by property owners. This approach would reduce unnecessary delays in the leasing process while maintaining health and safety standards. We are encouraged by preliminary discussions with the Administration and urge swift action to implement these changes. However, the City Council could also pass a law to establish a hierarchy of issues in inspections that would create a process for resolving minor issues without requiring reinspection. Additionally, the City Council could pass a law mandating that DHS inspectors carry basic, low-cost provisions that often lead to inspection failures, triggering a reinspection and the delays that accompany rescheduling. Those basic provisions could include nine-volt batteries, window guards, light switch and outlet plates and other easily transportable items that can be provided to the landlord or landlord agent at cost to fix minor issues on the spot.

Over the years, the City has implemented some improvements to CityFHEPS that have made the program stronger. However, to better evaluate improvements and ongoing efficiency, more data is needed. In order to increase transparency and accountability, the City Council should pass a law requiring that CityFHEPS lease up times be reported in the Mayors Management Report with the same metrics as Section 8. This reporting would create an objective way to evaluate the program moving forward.

Although fixing administrative issues remains a top priority, Win is also deeply committed to expanding eligibility of this vital program, which is more critical now than ever as we grapple with the worst homelessness crisis in our City's history. Win has continued to support efforts to see local laws 99, 100, 101, and 102 implemented, which would greatly expand eligibility. Sadly, the Mayor's refusal to implement those laws continues to leave tens of thousands of people in a state of homelessness or housing instability. While those laws remain tied up in litigation, it is also critical that families without legal immigration status gain access to the voucher. Currently, most migrant families are blocked from using any rental assistance due to their immigration status. That is why Win supports resolution 255 from Councilmembers Sanchez and Hanif, which calls on the state legislature to enact legislation that would provide New York City with the authority to expand CityFHEPS to all New Yorkers, regardless of their immigration status. Migrant families and children, the majority of whom are under the age of 5, come to New York City to seek shelter and refuge after experiencing unthinkable hardships. In a survey and interview series we did with our migrant families, we heard stories of starvation, violence, and persecution. Unfortunately, these accounts resemble countless other stories, and people continue to flee their homes by the thousands to save their lives and find a better future for their children. Right now, there are more than 50,000 new arrivals in the shelter system. This is not accounting



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for the thousands of immigrant families who were already in shelter, unable to move out with rental assistance and becoming long-term stayers, sometimes remaining in shelter for over five years. Presently, these vulnerable families and children are ineligible for rental assistance vouchers, a denial that is exacerbating record homelessness. Expanding CityFHEPS to undocumented New Yorkers is the right thing to do and would also save the City up to \$3 billion a year in shelter costs according to a report we released in 2023.

Finally, as the City gears up for budget season, we are deeply concerned about the Mayors proposed budget cuts of \$500 million from CityFHEPS. As the City braces for the impacts of likely federal cuts under the Trump administration, it is essential that the City invest more, not less resources into this vital program. Specifically, Win is calling on the City to increase funding for CityFHEPS by \$263 million, which would offset the proposed cuts to the Section 8 program in Project 2025 and ensure that the 10,000 households at risk of losing their federal rental subsidy will not fall into homelessness. Failing to prevent these individuals and families from falling into homelessness could cost the city up to \$1 billion in shelter costs per year.

CityFHEPS holds tremendous potential to address New York City's homelessness crisis, but administrative inefficiencies are hindering its impact. By modernizing processes, enhancing transparency, and addressing system shortcomings, the City can ensure that CityFHEPS fulfills its promise of helping families secure stable, permanent housing. Win stands ready to collaborate with the Council and the Administration to make these vital improvements a reality.

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



# HOUSING JOURNEY MAP

& challenges for clients applying for a CityFHEPS voucher in NYC

CHALLENGES

## 1 PATH application

Families apply for shelter at the Prevention Assistance and Temporary Housing (PATH) intake center in NYC.



- Family often placed in a different borough
- Impact on children's school & other
- Clients describe traumatizing experience

## 2 Win shelter intake

Clients get to Win and go through the shelter intake process with security staff before getting to their unit.

win

- Often late at night when no other staff is around
- Conditional stay until proving eligibility

## 3 Shelter services eligibility

Clients must be found eligible to stay in shelter before any voucher-related service can start.



- Prove 2-year "housing history" & other
- It can take up to a year to be found eligible.
- Street homelessness has the hardest time

## 4 Active public assistance case

Clients must have an active public assistance (PA) case before any voucher service / application can start.



- Strict earnings and working hours
- PA cases take 45 days or more to be active
- Lot of errors & lack of training at HRA Center

## 5 Form of income/employment

Clients must meet specific work and income requirements to be able to apply for a housing voucher.

- Disqualified even \$1 above limit (pay stubs)
- Inconsistent working hours not accepted
- Benefits cliff
- Lack of childcare is a major burden here

## 11 Rental package submission

Win housing staff submits final rental package (with approved client, landlord, unit, etc) to DHS.

win

- Problems accessing CURRENT & HOMES (DHS systems)

## 10 Landlord pre-approval

Landlords review and pre-approve client application. "Unit hold" incentive will apply in the end of the process.

- "Temp lease" while waiting for approval
- Unclear / changeable move-in date
- Landlords will pull out if process takes too long

## 9 Visit units, select & apply

Win housing staff provide apartment options and send application to landlords. Clients can also search independently.

win

- Limited affordable/ voucher housing
- Competition with other renters / families
- DHS inspection delays (if applicable)

## 8 Find & contact landlords

Win housing staff and clients identify landlords who accept vouchers & try to "convince" new landlords to accept it.

win

- Source of income discrimination
- Bad reputation of city programs
- Family "profiling"
- Landlord unfamiliarity w/ program

## 7 Voucher inquiry approval

DHS and HRA review, approve request & issue "shopping letter". HRA determines family rent contribution.



- Limitations on DHS staff capacity
- Up to 3 months to get a response
- Pay stubs expire and staff need to resubmit

## 6 Voucher inquiry application

Win case managers collect all required documents and submit clients' housing voucher inquiry to DHS.

win

- Huge DHS backlog
- Last minute changes in the process can apply

## 12 Rental package review

DHS, HRPD review and approve rental package (documentation, landlord, unit/building legality, etc).



- Takes a month or more
- Constant rejections for minor mistakes
- Several correction requests, not all at once.

## 13 Rental package approval (final)

HRA is the last agency to review and approve rental package. Once it gets to HRA it is rarely rejected.



- It can take a while for HRA's final approval

## 14 Furniture check issuance

HRA issues a furniture check to clients without own furniture/DHS paid furniture storage.



- Delays can occur
- Sometimes clients move out without furniture

## 15 City payment package

HRA issues a 4-month rent payment upfront, the security deposit and landlord incentives.



- Issuing can take up to 3 weeks
- Missing checks, incorrect amount, etc
- Win needs to pick up first checks in person

## 16 Client move-out

Clients have a key exchange ceremony at their site. Landlords are welcome to join.

win



win

# HOUSING JOURNEY STEPS

## *additional details*

- 1 PATH application** After families apply, PATH contacts shelter providers to check unit availability and determine family placement. If space is available at Win, PATH provides transportation to the site.
- 2 Win shelter intake** Within 24 hours of intake, clients are connected to a case manager and offered key shelter services. Until proving eligibility, conditional clients can't access housing coordination.
- 3 Shelter services eligibility** A PATH investigation occurs and families must prove they don't have a housing alternative. The investigation is supposed to take up to 10 days, but often takes much longer.
- 4 Active public assistance case** All family members must be on the PA case. SSI families are not eligible for PA, but can apply for CityFHEPS via "single issuance". Clients above the federal poverty line will automatically lose PA and housing voucher.
- 5 Form of income / employment** Clients must work at least 10 hours a week for 30 days or receive SSI to qualify. Off the books work is also considered. Staff will work with clients on income calculations (budget) and pay stubs submission to apply for a voucher inquiry.
- 6 Voucher inquiry application & approval** If inquiry is approved, clients will get a "Shopping Letter" that demonstrates (to brokers/landlords) that they have income to pay rent. The letter has details on the voucher value, family's 30% contribution, bedroom/apartment size, etc.
- 7**
- 8 Find & contact landlords** Housing managers build relationships with landlords and brokers to help clients find housing. Clients are also tasked to search and add 3 housing options per week to their "apartment search log".
- 9 Visit units, select & apply** Clients enter a fierce competition for housing in NYC, often facing source of income and other types of discrimination. Once a unit is selected, DHS will ensure there are no landlord or building violations & inspect basement and 1st floor units as part of a review process that can present major delays and backlogs.
- 10 Landlord pre-approval** Landlords pre-approve client application and wait for city agencies' review and final approval. The city will pay a "unit hold incentive" to prevent unit withdrawal but some landlords will still pull out of the process if it takes too long.

- 11 Rental package submission & review**

Housing Coordinators submit rental package with required documentation, pre-approvals and inspections. Still, the package can be rejected for minimum mistakes. Since there is no clear date for final city approval, move-in date also remains unclear, which can again disincentivize landlords.

- 12**
- 13 Rental package approval**

After DHS' and HRPUs' revisions, HRA reviews and approves rental package. Once approved the voucher will be linked to the unit on the package.

- 14 Furniture check is issued**

A furniture allowance is automatically added to client's EBT card if they don't have DHS paid storage. [clients who enter shelter but own furniture can get storage paid by DHS. Win staff helps coordinate the process].

- 15 City payment package**

City issues initial landlord payment package comprised of: (1) security voucher amount, (2) 1st month's rent in full, (3) 3 months' city portion of voucher upfront, (4) unit hold incentive, (5) pro-rated amount from the day the voucher got approved. Win staff must pick up all checks and make first payment to landlords in-person.

- 16 Client move-out**

Win staff host a client move-out ceremony in shelter.

## Acronyms & Terms

**CityFHEPS:** City Family Homelessness and Eviction Prevention Supplement

**PATH:** Prevention Assistance and Temporary Housing

**DHS:** Department of Homeless Services

**HRA:** Human Resources Administration

**DSS:** Department of Social Services

**HRPU:** Housing Referrals and Processing Unit

**ACS:** Administration for Children's Services

**PA Case:** Public Assistance Case

**SSI:** Supplemental Security Income

**Benefits Cliff:** When families receiving a benefit increase their income and become ineligible for the benefit despite still being unable to sustain themselves without it. In practice, this means it may be more beneficial to maintain a lower income and not lose benefits.

**Conditional clients:** After a family applies for shelter at PATH, they are assigned a "conditional" shelter placement while PATH/DHS investigates their application and determine if they are eligible for continued shelter services.

**Shopping Letter:** DSS-provided letter to families who may qualify for the voucher based on the submitted information. This allows them to house hunt and go through the full application process once they have found a suitable apartment.

# win

at a glance

Win is the largest provider of shelter in New York City—and the country—for families with children experiencing homelessness. For over 40 years, Win has provided safe housing, trauma-informed services, and innovative programs to help families rebuild their lives. In the past year, we served over **12,400** people – including over **5,600 children**.

## Breaking the cycle of homelessness in an intergenerational manner.



**Five boroughs.**  
**16 transitional housing facilities.**  
**Over 450 units of supportive housing.**



↑ **6,500** people are housed by Win each night.

↑ **9 in 10** of Win's families are led by women.

↑ Win shelters **17%** of all children experiencing homelessness in New York City.



**750:**

the total number of STEAM activities that Win kids participated in at Camp Win 2024.

**50**

young adult residents of Win's shelters were accepted to college last year.

**235**

adults found employment last year while living at Win.

**93%**

of Win families remain stably housed one year after leaving shelter.

**967**

Win families were placed into permanent housing last year.



# 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 co-authored this report to leverage our collective insights and experiences with the challenges facing the City's voucher programs. We all share a common goal: Improving the voucher process and helping voucher holders find stable housing.

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

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

# Acknowledgements

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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.<sup>3</sup> 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.<sup>4</sup> 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.<sup>5</sup> 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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# 1

## ADMINISTRATIVE DELAYS

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



# 1

## Administrative Delays

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

To secure permanent housing through a voucher program, voucher holders must navigate a complex bureaucratic process that differs from program to program. Administrative challenges typically arise before voucher issuance, and data shows that application processing times have considerably increased over the past several years. According to the 2024 Mayor’s Management Report (MMR), the median time between completion of a Section 8 voucher application and issuance increased by almost 120% between FY22 and FY23.<sup>4</sup> 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.<sup>5</sup> 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.<sup>8</sup>*

**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.<sup>9</sup>*

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

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

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



# CHALLENGES WITH TECHNOLOGY AND PERSONNEL

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

# 2

## Challenges with Technology and Personnel

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

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

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

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

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

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

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

Technology and staffing constraints also impact tenants' abilities to renew their vouchers. Many voucher holders fail to receive annual recertification notifications or any confirmation of their recertification despite multiple attempts to file the necessary paperwork. When renewal applications are not processed, voucher holders do not receive their aid, leading to terminated benefits or eviction and missing rent payments for the property owner. In an article published by THE CITY, an HRA caseworker stated that tenants often become aware their vouchers did not get renewed through a notice they are behind on rent.<sup>10</sup> 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.<sup>11</sup>** All documents should be updated on the online portal, modernizing the current lengthy application process. This technology has been used in real estate for years (Board Packager, Onsite, etc.) and should be adopted to help streamline and expedite voucher processing.

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

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



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

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

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

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

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

# 3

## ISSUES WITH PAYMENT STANDARDS

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



# 3

## Issues with Payment Standards

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

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

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

Voucher holders have also lost housing opportunities for a subset of apartments operated by not for profits with amended regulatory agreements under Section 610 of the Private Housing Finance Law. Section 610 permits certain not-for-profit owners of affordable housing projects subject to regulatory agreements to collect rents that exceed the legal, regulated rent without impacting the amount the tenant pays.<sup>12</sup> 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.

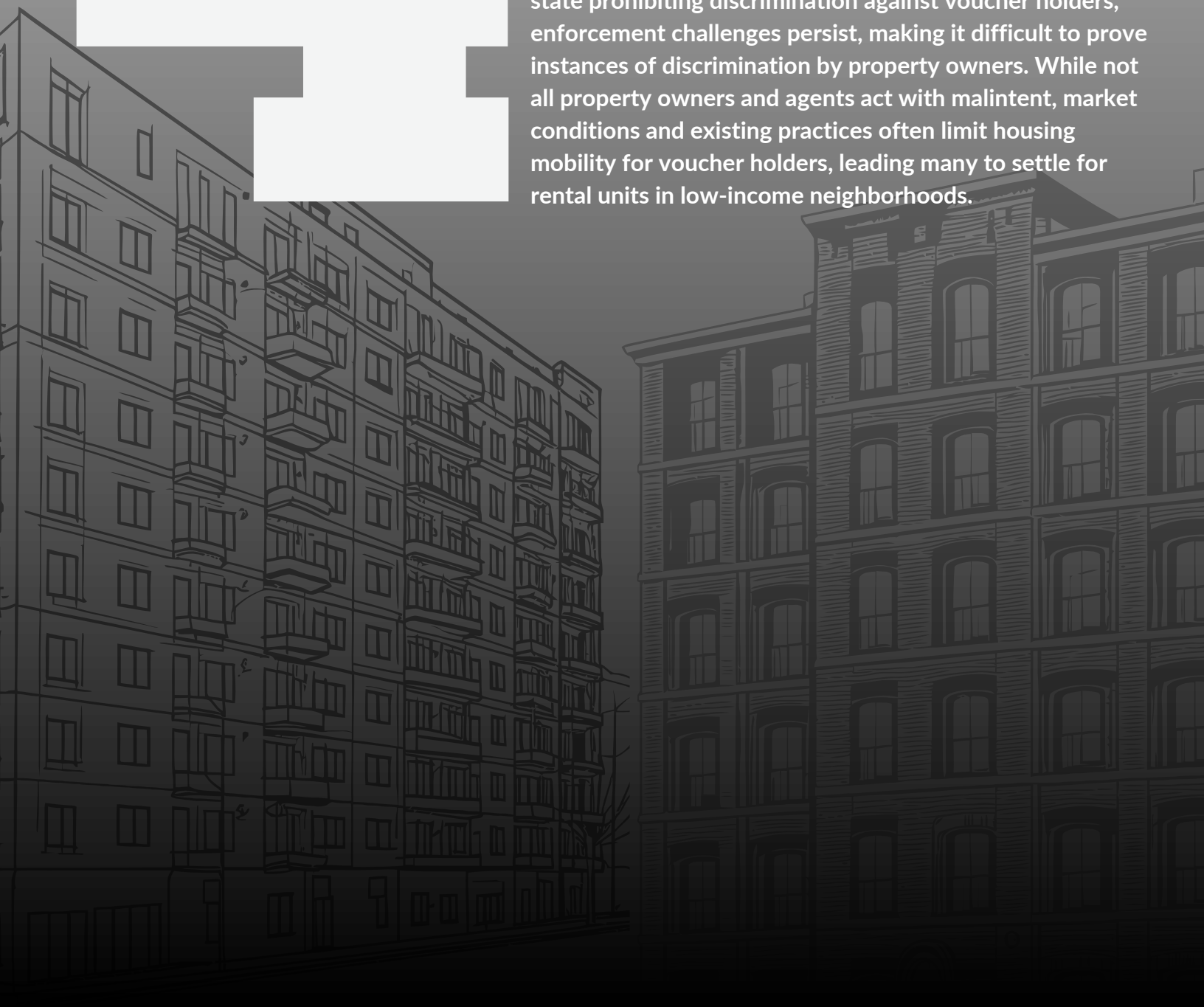
- DSS may also adopt rules amending Chapter 10 of the Rules of the City of New York concerning a master lease pilot program for CityFHEPS vouchers.

**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

## SOURCE OF INCOME DISCRIMINATION

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



# 4

## Source of Income Discrimination

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

In 2008, New York City passed Source of Income anti-discrimination laws, prohibiting property owner discrimination against vouchers, among other legal sources of income.<sup>15</sup> 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.<sup>16</sup> 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.*<sup>18</sup>

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.<sup>19</sup> However, CCHR only filled three of the thirteen allocated positions before the city-wide hiring freeze went into effect. **Thus, the Council should maintain the funding committed in the Fiscal 2024 Executive Plan and exempt CCHR from the ongoing hiring freeze.**

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

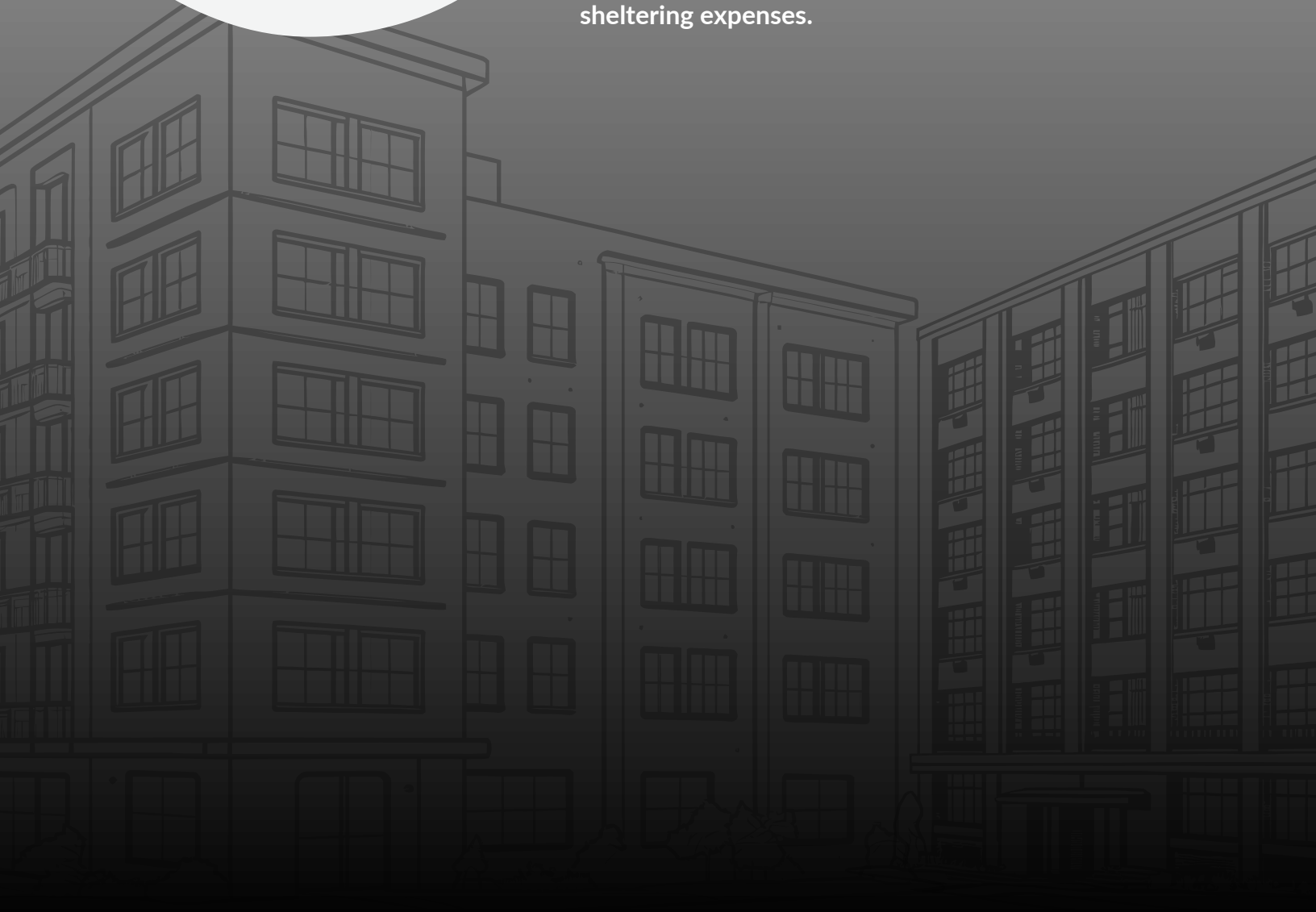




# 5

# THE AFFORDABLE HOUSING LOTTERY

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



# 5

## The Affordable Housing Lottery

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

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.<sup>24</sup> 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).<sup>26</sup> 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: <https://legalaidnyc.org/get-help/housing-problems/what-you-need-to-know-about-hras-family-homelessness-eviction-prevention-supplement/>
  - b. FHEPS Fact Sheet for Property owners: [https://www.nyc.gov/assets/hra/downloads/pdf/fheps\\_fact\\_sheet\\_for\\_property\\_owners.pdf](https://www.nyc.gov/assets/hra/downloads/pdf/fheps_fact_sheet_for_property_owners.pdf)
  - c. FHEPS Client Fact Sheet: <https://www.nyc.gov/assets/hra/downloads/pdf/FHEPS/HRA-146r-english.pdf>
  - d. FHEPS Payment Standards: <https://www.nyc.gov/assets/hra/downloads/pdf/FHEPS/HRA-146z-E.pdf>
  - e. Unit Hold Incentive Voucher: <https://www.nyc.gov/assets/hra/downloads/pdf/hra-145-e.pdf>
2. **CityFHEPS:** run by DHS, CityFHEPS is a voucher program for families with children who receive Cash Assistance and are at risk of being evicted or have lost their housing due to domestic violence or safety/health issues.
  - a. CityFHEPS Fact Sheet: <https://www.nyc.gov/assets/hra/downloads/pdf/CITYFHEPS/CITYFHEPS-fact-sheet.pdf>
  - b. CityFHEPS Frequently Asked Questions for Property Owners and Brokers: <https://www.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/dss-8j-e.pdf>
  - c. How to Register an Apartment/Room/SRO through CityFHEPS: [https://www.nyc.gov/site/hra/help/property\\_owners.page](https://www.nyc.gov/site/hra/help/property_owners.page)
  - d. CityFHEPS Documents: <https://www.nyc.gov/site/hra/help/cityfheps-documents.page>
3. **Section 8 – Housing Choice Voucher Program:** a federal program administered through state and local governments that provides rental assistance to low-income families to rent privately owned housing. Local housing authorities, including NYCHA, HPD, and DHCR, run Section 8.
  - a. Section 8 Voucher Types: <https://www.nyc.gov/site/hpd/services-and-information/section-8-voucher-types.page>
  - b. Section 8 Property Owner Guide: [https://www.nyc.gov/site/nycha/section-8/guide-for-property\\_owners.page](https://www.nyc.gov/site/nycha/section-8/guide-for-property_owners.page)
  - c. Voucher Payment Standards and Utility Standards: <https://www.nyc.gov/site/nycha/section-8/voucher-payment-standards-vps-utility-allowance-schedule.page>
  - d. Section 8 Tenants Frequently Asked Questions: <https://www.nyc.gov/site/nycha/section-8/tenants-faq.page>
  - e. Rent Reasonableness Frequently Asked Questions: <https://www.nyc.gov/site/nycha/section-8/rent-reasonableness-faq.page>
4. **Emergency Housing Voucher (EHV) Program:** run by NYCHA and HPD, EHV supports people who are in danger of experiencing homelessness, including survivors of intimate partner/domestic violence.
  - a. EHV Program Overview: <https://www.nyc.gov/site/nycccoc/ehv/ehv.page>
  - b. EHV FAQ: <https://www.nyc.gov/assets/nycccoc/downloads/pdf/ehv-faqs.pdf>
  - c. HUD's EHV Resources: <https://www.hud.gov/ehv>
  - d. Owner Resources: <https://www.nyc.gov/site/nycccoc/ehv/owner-resources.page>
5. **HIV/AIDS Services Administration (HASA):** administered by HRA, HASA offers intensive case management and housing assistance to individuals living with AIDS or HIV illness in New York City. HASA provides case management, home visits, long-term rental assistance, and short-term shelter, transitional, and supportive housing placement. Rental assistance covers any portion of the rent above 30% of monthly income for single cases.
  - a. HASA FAQs: <https://www.nyc.gov/site/hra/help/hasa-faqs.page>
  - b. HASA Housing Options: [https://www.health.ny.gov/professionals/patients/discharge\\_planning/docs/2008-07-10\\_hasa\\_housing\\_options\\_jruscillo.pdf](https://www.health.ny.gov/professionals/patients/discharge_planning/docs/2008-07-10_hasa_housing_options_jruscillo.pdf)

# Appendix Cont.

6. **HUD-VASH Vouchers:** HUD-VASH is a collaborative program that pairs Section 8 Housing Choice Voucher (HCV) rental assistance with Department of Veterans Affairs (VA) case management and supportive services for homeless Veterans.
  - a. NY State HUD-VASH Page: <https://veterans.ny.gov/supportive-housing-hud-vash-program>
  - b. HUD-VASH General Information: <https://www.va.gov/homeless/hud-vash.asp>
  - c. HUD-VASH Fact Sheet for Property Owners and Brokers:  
[https://www.nyc.gov/assets/hra/downloads/pdf/HUD-VASH-property\\_owner-fact-sheet.pdf](https://www.nyc.gov/assets/hra/downloads/pdf/HUD-VASH-property_owner-fact-sheet.pdf)



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2025 January 27

William Jourdain

Executive Director

Woodside On The Move Inc.

51-23B, Queens Blvd

Woodside, NY, 11377

[wjourdain@woodsideonthemove.org](mailto:wjourdain@woodsideonthemove.org)

Re: New York City Council Committee on General Welfare Oversight and Administration of CityFHEPS: Practical Solutions for Supporting Vulnerable New Yorkers

Greetings, **Chair Ayala**, members of the Committee, and distinguished guests. My name is **William Jourdain**, and I am the **Executive Director of Woodside on the Move**, a nonprofit organization that has served the borough of Queens for nearly 5 decades. I'm here today to testify about the oversight and administration of CityFHEPS and offer practical solutions to better support our city's most vulnerable populations, particularly seniors, veterans, and un-housed New Yorkers.

Queens is at a breaking point when it comes to affordable housing, especially for seniors. At Woodside on the Move, we witness this crisis daily. I want to share the story of one of our long-time volunteers, a senior citizen and undocumented immigrant who gave tirelessly to her community, even during the pandemic. Despite her selflessness, she faced eviction due to hardships, had to move in with distant relatives, and eventually ended up in a shelter without any real prospects to find or obtain a permanent home. Her challenges were compounded by discrimination in the job market and the instability of shelter living. Her story is a stark reminder of why we must prioritize seniors and other vulnerable groups in policies like CityFHEPS.

Each year, Woodside on the Move provides housing services to over 2,000 families, 80% of whom are seniors. Unfortunately, we could help hundreds more if the resources matched the overwhelming demand. Seniors in Queens are disproportionately affected by eviction, displacement, and homelessness. With nearly 400,000 residents aged 65 and older, more than any other borough, Queens is home to a vulnerable senior population—14% of whom live below the poverty line. Many seniors in neighborhoods like mine in Woodside, or in the neighborhood I grew up in, in Jamaica, are rent-burdened. Often choosing between basic needs and paying rent.

While housing vouchers are a lifeline for some, seniors face significant barriers: landlords refusing vouchers, years-long waitlists, and an inadequate supply of affordable housing.

CityFHEPS is a critical program, but its administration has room for improvement. Housing vouchers in New York City often feel like winning the lottery, but imagine winning a prize with nowhere to claim it. The current system suffers from delays in inspections, slow payments to landlords, and a lack of enforcement against source-of-income discrimination. While the city has committed \$3.1 million over four years to combat such discrimination, it's not enough. I urge the Council to double this investment, providing the Department of Housing Preservation and Development with the resources needed to hold landlords accountable and protect voucher holders. Without stronger enforcement, the laws remain toothless, and seniors, veterans, and families continue to suffer.

To truly address the housing crisis, we need a multi-faceted approach:

1. **Streamline CityFHEPS Administration:** Improve the voucher process by reducing delays in inspections and payments. This will incentivize landlords to participate in the program and increase housing availability for voucher holders.
2. **Expand and Protect Housing Vouchers:** Expand funding for vouchers and strengthen anti-discrimination laws to ensure they are usable in a tight housing market. Doubling enforcement resources will create meaningful accountability for landlords who violate these laws.
3. **Create a Senior Housing Subsidy:** Establish a new subsidy ensuring rent-burdened seniors pay no more than one-third of their income on rent. This would provide immediate relief, allowing seniors to age with dignity in their communities.
4. **Build and Preserve Affordable Housing:** Prioritize new housing developments with accessibility features and community services for seniors. Legalizing basement units citywide could also unlock new affordable housing stock, while neighboring counties must share the responsibility of building more housing.
5. **Ensure Tenant Protections:** Strengthen tenant protections to prevent displacement and provide legal assistance to those at risk of eviction. Seniors who have contributed to their communities for decades should not face the heartbreak of losing their homes.

At Woodside on the Move, we see firsthand how stable housing changes lives. It provides not just shelter but peace of mind, security, and dignity in being a home. The Council has a unique opportunity to break down the barriers to affordable housing, and I urge you to act boldly. By enhancing the administration of CityFHEPS and implementing these solutions, we can create a city where every senior, veteran, and un-housed New Yorker has a place to call home.

Thank you for your time and commitment to addressing this critical issue. I am happy to answer any questions you may have.

**Committee on General Welfare**  
**Oversight Hearing on Administration of CityFheps**  
**January 29, 2025**

My name is Jasmine Smith, a CityFheps voucher holder, Lead Member at Neighbors Together, Bronx Resident, Harm Reduction Specialist, and a mother of three. I am here to urgently address the critical lack of funding for the CityFheps program, a situation that threatens the permanent housing of my family.

The staff shortages in the program have directly affected me. In 2020, my rent increased from 1,580 to \$2,007, and I would have been liable for the difference if I had not received a voucher modification. The voucher modification process was lengthy due to the shortage of staff. I went to Homebase and had to wait 2 months just for an intake appointment. I met with a nice young worker inside an office with many empty cubicles, only to be sent to an HRA office to modify my voucher. It took four months to modify my voucher and another three months for the program to pay the back rent.

The increase in CityFheps payments to a fair market rate was a fantastic achievement, but the lack of staff and timely payments sucked all the joy and sustainable success for voucher holders. I was almost evicted from my apartment and homeless again due to the long wait times. Cityfheps has to stay protected so individuals and families can be permanently housed.

I wanted to share my story today because I want the council to know that real people are attached to this program. I live in constant fear of being evicted due to the program's instability. This fear is not just a feeling, but a real possibility that I and many others face. Please consider that I am a hard-working taxpayer of New York, a mother, and a career giver. I deserve an affordable place to live, and the city has an obligation to help. Having more staff would create positive experiences for voucher holders.

Thank you so much for taking the time to read my testimony. I appreciate your consideration and solutions.

Sincerely,  
Jasmine Smith

**Committee on General Welfare**  
**Oversight Hearing on Administration of CityFheps**  
**Testimony by Khaliyl Mayes**  
**January 29, 2025**

Thank you, City Council and all the members Committee on General Welfare.. My name is Khaliyl Mayes; I am a member of Neighbors Together. I received my LINC housing voucher while in a shelter and converted to CityFheps. I moved out of the shelter in 2018, where I rented a room. Within a year of living with roommates, my housing became unstable due to my safety concerns. I experienced verbal disputes where the NYPD got involved, and this went on for four and a half years.

In 2019, I received a transfer voucher from Homebase, and since then, it has taken a month to see a caseworker to receive an active voucher. I felt that the caseworker wasn't informative and didn't offer much support on my rights as a voucher holder, and the journey during my housing search has been daunting and challenging. Another discouraging aspect of this experience is that the caseworker did not respond to emails or phone calls in a timely fashion, so I almost missed out on an opportunity to rent an apartment, and the landlord almost gave up on me. Without the intervention from Neighbors Together, I finally moved into my apartment in 2023. Neighbors Together has advocated on my behalf to communicate with Homebase and inform me of my rights, I believed my safety would have been in jeopardy and If I was still unhoused.

I've been in my apartment using CityFheps to cover my rent for 1.5 years. I am grateful to have a safe home. Att Homebase instead of voucher holders having to wait months for an intake appointment to obtain a voucher- to solve this issue, there needs to be more workers to assist anyone who needs help to move into an apartment. I know that other Cityfheps voucher holders are currently experiencing a long wait time to get a voucher and to submit a move-in package after being linked to an apartment, and also receiving updates/ status of the moving package to share with the landlord or broker.- without this form of communication, it is difficult to get an apartment. There also needs to be a package system or phone number where voucher holders who are not in a shelter can get the status of the move-in package to get informed and share expectations with the broker and landlord to move into an apartment.

Thank you for your time and consideration and I hope my experience will foster a positive resolution to make the CityFheps program efficient.

**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: Rev Terry Trook

Address: 100 Park Ave 55 NY 10302

I represent: Project Hospitality

Address: 100 Park Ave 5 NY 10302

**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: STEVE BEHAN

Address: [REDACTED] BRAYSIDE, NY 11264

I represent: Self

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: Helen Strom

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

I represent: Safety Net Project - Urban Justice Center

Address: 40 Rector St 5th Fl NY NY 10006

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THE CITY OF NEW YORK

15

Appearance Card

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

in favor  in opposition

Date: 1/27/2025

(PLEASE PRINT)

Name: Laura Lazarus

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

I represent: Anthos Home, Inc.

Address: 150 Broadway, New York, NY 10271

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

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

in favor  in opposition

Date: 1/27/25

(PLEASE PRINT)

Name: Chris Mann

Address: 1 State St. Plaza

I represent: Win

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

THE COUNCIL  
THE CITY OF NEW YORK

13

Appearance Card

[ ]

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

in favor  in opposition

Date: 1/27/25

(PLEASE PRINT)

Name: LAURA LAZARUS

Address: 90 BROAD ST #1703A

I represent: ANTIHOSHOME

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

**THE COUNCIL  
THE CITY OF NEW YORK**

15

Appearance Card

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

in favor  in opposition

Date: 1/27/25

(PLEASE PRINT)

Name: ERIC LEE

Address: [redacted] Ridgewood NY 11785

I represent: Volunteers of America Greater New York

Address: 135 W 80th St NY NY

**THE COUNCIL  
THE CITY OF NEW YORK**

14

Appearance Card

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

in favor  in opposition

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

(PLEASE PRINT)

Name: Graham Horn

Address: 100 Pearl St. 15th Floor

I represent: New York Legal Assistance Group

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

**THE COUNCIL  
THE CITY OF NEW YORK**

13

Appearance Card

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

in favor  in opposition

Date: Jan 27 2025

(PLEASE PRINT)

Name: GERMAINE DELANEY

Address: [redacted] 11405

I represent: Myself Avenue, NY 11692

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

THE COUNCIL  
THE CITY OF NEW YORK

12

Appearance Card

[ ]

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

in favor  in opposition

Date: 1-27-25

(PLEASE PRINT)

Name: Diana Ramos

Address: [Redacted]

I represent: Safety Net Activists

Address: 40 Rector St.

THE COUNCIL  
THE CITY OF NEW YORK

11

Appearance Card

[ ]

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

in favor  in opposition

Date: 1/29/2025

(PLEASE PRINT)

Name: William Botchway

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

I represent: Neighborhood Defender Service of Harlem

Address: 317 Lenox Ave 10th Floor NY, NY 10029

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Appearance Card

[ ]

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

in favor  in opposition

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

(PLEASE PRINT)

Name: [Redacted]

Address: [Redacted]

I represent: [Redacted]

Address: [Redacted]

**THE COUNCIL**  
**THE CITY OF NEW YORK** 9

Appearance Card

[ ]

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

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

(PLEASE PRINT)

Name: Timothy Pena

Address: 257 W. 29th St.

I represent: Veterans Justice Project

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

**THE COUNCIL**  
**THE CITY OF NEW YORK** 5

Appearance Card

[ ]

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

Date: 1-27-25

(PLEASE PRINT)

Name: ELIZABETH MACKEY

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

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

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

**THE COUNCIL**  
**THE CITY OF NEW YORK** 4

Appearance Card

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

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

(PLEASE PRINT)

Name: Noam Cohen-Weinberg

Address: [REDACTED] BROOKLYN, NY 11201

I represent: MYSELF

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

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THE CITY OF NEW YORK

3

Appearance Card

1/27/25

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

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

(PLEASE PRINT)

Name: Gina Capricciti

Address: \_\_\_\_\_ NY, NY 10018

I represent: New Destiny Housing Cooperative

Address: 12037th St

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2

Appearance Card

I intend to appear and speak on Int. No. CITY FHEPS Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: 1/27/25

(PLEASE PRINT)

Name: Robert Desir

Address: 49 Thomas Street

I represent: Legal Aid Society

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

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Appearance Card

I intend to appear and speak on Int. No. CITY FHEPS Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: 1/27/25

(PLEASE PRINT)

Name: Kate Goldmann

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

I represent: REBNY

Address: 570 Lexington

**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: 1/27/2025

**(PLEASE PRINT)**

Name: Commissioner Park

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

I represent: DSS

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

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

**THE COUNCIL  
THE CITY OF NEW YORK**

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

Date: 1/27/2025

**(PLEASE PRINT)**

Name: Andrea Bevil, DC of Prevention and Heavy Assistance

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

I represent: DSS

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

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

**THE COUNCIL  
THE CITY OF NEW YORK**

*Appearance Card*

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

Date: 1/27/2025

**(PLEASE PRINT)**

Name: Reese Henderson, Chief of Placements

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

I represent: DSS

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

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**THE COUNCIL  
THE CITY OF NEW YORK**

*Appearance Card*

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

Date: 1/27/25

**(PLEASE PRINT)**

Name: Christopher Leon Johnson

Address: 223 Buffalo Ave Apt 211

I represent: Self

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

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