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HOMELESS SERVICES UNITED
City Council Testimony on Homelessness Policy Shift
November 9, 2011

Good morning. I would like to thank Speaker Quinn, Chair Palma and the City Council members present here today for this opportunity to testify on why we are opposed the proposed intake and assessment policies by the Department of Homeless Services which states that single homeless adults must “apply” for temporary housing assistance. This action reverses 30 years of established policies at the front door that have clearly established New York City as a national leader of shelter provision for its most vulnerable citizens. If enacted, the burden of proof will fall upon the “applicant” thus leaving the final decision in the hands of government workers whose mission is to restrict access to vulnerable people who needs its services.

My name is Christy Parque and I am the Executive Director of Homeless Services United (HSU). HSU is a coalition of 50 non-profit agencies serving homeless and at-risk adults and families in New York City. HSU provides advocacy, information, and training to member agencies to expand their capacity to deliver high-quality services. HSU advocates for expansion of affordable housing and prevention services and for immediate access to safe, decent, emergency and transitional housing, outreach and drop-in services for homeless New Yorkers.

Homeless Service United’s member agencies operate hundreds of programs including shelters, drop-in centers, food pantries, Home Base, and outreach and prevention services. Each day HSU member programs work with thousands of homeless families and individuals preventing shelter entry whenever possible through counseling, legal services and public benefits assistance among many other supports. Our member agencies provide high quality and compassionate emergency shelter to nearly 20,000 homeless New Yorkers nightly. Homeless service providers toil at the cross section of many society’s problems. Our clients confront high housing costs, difficulty finding work, mental and physical illness, substance abuse, and domestic violence and are particularly vulnerable during financially hard times such as these.

Homeless Services United strongly believes this misguided policy will be detrimental for single homeless adults. For many years, street homeless adults refused to enter the shelter system because of fear of being assaulted or languishing in the overcrowded and dirty shelters. Since the city has contracted out most of its shelter provision to the non-profit sector, most of these concerns no longer exist.

Homelessness is ubiquitous in American history. Although its shape and form continues to shift, the pervasiveness of homelessness throughout this country’s history, beginning in the antebellum period, is well documented. However, in the last 30 years, incidence of homelessness has steadily

increased and since the recession of 2008, the numbers of all sub-sets of homeless people except for those who are chronic have risen. These include families, youth, single adults, and rural and suburban homelessness. People become homeless for many reasons, but one overarching commonality is economics. Individual risk factors are important contributors, but most important, lack of affordable housing and employment opportunities that pay a living wage are its primary culprits.

Studies clearly show that people suffering from mental illness and substance abuse are much more overrepresented among the homeless than the general population. Since the city, state and Federal governments lack a coherent mental health and housing policy; these vulnerable people often end up at the homeless service system's front door. Properly assessing for mental illness is tricky and if the first line of questioning is solely based on eligibility criteria, seriously mentally ill people (and many others) are not in position to "prove" their status of homelessness.

This misguided policy states that shelter applicants who are doubled up with people who will no longer accommodate them cannot testify on the applicant's behalf that they can no longer stay with them! Government officials can step in to say this is not sufficient! This is a basic infringement of the role of government into the decision making authority of a primary tenant's claim that the applicant can no longer live in his/her residence. The sole determination of homelessness rests upon a disinterested government official. As well, this definition of disallowing people leaving doubled up situations is in violation of the 2009 Hearth Act.

The Department of Homeless Services should not erect barriers for its most vulnerable citizens especially at a time when homelessness continues to rise. What is needed are policies that support a New Yorker's right to transitional housing at a time in his or her life when the person temporarily needs to be a transitional setting. Studies clearly show that the majority of people who experience homelessness do so for a short duration and leave transitional systems fairly quickly on their own.

The Department of Homeless Services working with its non-profit partners has done an excellent job in the last 5 years of lowering the street homeless population. This is due to a number of factors to include focusing housing opportunities for this specific population, making shelter safer by sub-contracting them out to non-profit providers and making the front door accessible. In comparison to large cities throughout the country, New York City has one of the lowest incidence rates of street homeless population in the country. This proposed policy change would negatively affect this positive change and more than likely increase the number of people living on street. With this proposed policy shift, the right to transitional housing becomes threatened for those who need it most. This change without a right to permanent housing is morally indefensible.

I appreciate the invitation to speak on this issue, which is of great importance to my members and all providers of services to homeless people. Opportunities like this, where community and stakeholders participate in discussion on policy changes and program design will serve to strengthen the quality of services that my members provide to homeless and at-risk New Yorkers. Working toward the goal of ending homelessness continues to be the goal of all homeless services providers and unfortunately this proposed policy change works counter to the larger goal of ending homelessness for New Yorkers.



City Council Hearing
General Welfare Committee

"Oversight: New Homeless Shelter Eligibility Process for Single Adults"
Wednesday, November 9, 2011

INTRODUCTION

Good afternoon Chair Palma and members of the General Welfare Committee. I'm Seth Diamond, Commissioner of the Department of Homeless Services (DHS) and I'm pleased to be joined today by George Nashak, our Deputy Commissioner for Adult Services.

I appreciate this opportunity to share information with you regarding the eligibility process we plan to implement at our intake centers for single adults on November 14, 2011. I would also like to acknowledge the tremendous dedication and hard work of DHS staff and that of our nonprofit shelter providers who work each day to ensure that men and women in our adult shelter system are afforded the assistance they need to overcome their housing crisis and return to the community as quickly as possible. Through our eligibility process for single adults, we strive to preserve a costly yet critical benefit while helping those with available housing options or sufficient financial resources remain in the community.

It is clear that individuals at-risk of becoming homeless are best served in the community. It is incumbent upon us to assist those seeking shelter services to avoid entering the shelter system. We accomplish this through collaborative efforts with our preventive service providers and other nonprofit partners who offer an impressive array of community-based services. As you all know, over 15 years ago, under Commissioners Joan Malin and Gordon Campbell, and with support from the State, DHS implemented a family eligibility process. That process has evolved over the years and the strength and integrity of our determinations on the families' side is affirmed through State fair hearings where during FY2011, 98 percent of our decisions were upheld. As I will explain shortly, our eligibility process for single adults is modeled, in very large part, on the eligibility process at PATH, our family intake center.

THE NEED FOR A SINGLE ELIGIBILITY PROCESS

Over the past three decades, the City transformed its shelter system for single adults to one that is recognized as the most comprehensive and sophisticated in the nation. Today, the City is proud to offer a variety of shelter programs for specific populations, including the employed or employable, individuals with mental illness and those who are battling alcoholism or addiction. As public servants, we have an obligation to monitor and respond to systematic changes, whether that be through a change in the services we provide or, in this case, implementation of an eligibility process to help us distinguish between those individuals who have alternatives to shelter and those who do not.

Recently, we've observed two notable shifts in the single adult populations we serve. Only five years ago, one-third of the adult shelter population reported having lived on the street prior to shelter entry. Today, less than 15 percent of those seeking shelter report a history of street homelessness. In fact, nearly 60 percent of men currently seeking shelter were living with family or friends before they arrived at intake. For this reason, we believe that through implementation of an eligibility process, we can identify applicants who can safely return to available housing resources in the community.

State regulations provide guidance on the proper interpretation of these regulations. State Administrative Directive 94 ADM-20 states in pertinent part:

As a general rule, **individuals and families** must be responsible for making their own housing arrangements. Districts have a limited ability to provide housing and are neither expected nor obligated to provide temporary housing assistance unless it is clearly demonstrated that the person requesting assistance is faced with an immediate need for housing, has made reasonable efforts to secure housing and cannot access any other housing even on a temporary basis.

DHS will use an eligibility process to determine whether single adult applicants have available housing options or the financial resources to independently secure their own housing. This procedure not only is modeled on the integrated approach for families with children, but also employs the extensive checks and balances of that process to ensure that applicants who are in fact homeless receive shelter. Those found ineligible are linked to resources and supports to enable them to maintain housing stability in their home communities. In moving forward with this new assessment process, we remain committed to the principle that every applicant merits individualized attention and unique consideration.

Under the single adult eligibility process, specialists will interview applicants in person and in great detail to elicit, among other things, the reasons why the applicant seeks shelter and inquire where they lived in the past year. Eligibility specialists will conduct a thorough review of an applicant's eligibility for shelter and render a written eligibility recommendation based on the full understanding of each applicant's circumstances. We will also continue to provide diversion assistance to applicants at our adult intake centers. Staff from the Human Resources Administration (HRA) will be available on-site to help applicants access other City services. Specialized staff will also be available at intake centers to help ineligible individuals return to the community by offering a variety of services and linkages to meet their needs, including family mediation, housing advice, employment referrals and benefits advocacy.

Given our decades of experience working with mentally ill shelter clients, we recognize that there will be applicants who, because of impairment are unable to participate in the application and investigation process. Thus, if applicants report or exhibit signs of impairment, the eligibility specialist will immediately refer them to a licensed social worker. The social worker will interview such applicants to determine whether they have an impairment that renders them unable to participate in the application or investigation process. If the applicant needs assistance,

the social worker will consult with a supervisor to determine if the applicant needs immediate medical attention, has an alternative housing option or is eligible for shelter. DHS staff will investigate whether the applicant has housing options by conducting interviews with the applicant and relevant third parties such as primary tenants with whom the applicant lived prior to seeking shelter.

Our eligibility procedure has multiple safeguards to ensure the accuracy of our determinations. I have already talked about one of the most significant safeguards — assessments conducted by licensed social workers. In addition, eligibility specialists will prepare a written recommendation regarding each applicant's eligibility for shelter, which is subject to their supervisor's review and final approval. All applicants found ineligible will have the right to an agency conference before a DHS attorney who will have the authority to reverse the determination or request further investigation and evaluation. At the conference, the applicant can also provide new information or documentation which will be reviewed. All applicants will have the right to challenge the denial of their application at a State fair hearing. They also have the option to bring an advocate of their choosing to the agency conference and/or hearing to support their effort. The written notice that all applicants receive informing them of the agency's eligibility determination includes the phone numbers of the Urban Justice Center and the Coalition for the Homeless and instructions on how to request an agency conference and/or fair hearing. Applicants will also have the option of discussing their case with DHS' Office of Client Advocacy whose staff can provide crisis counseling, mediation services and assistance in navigating the eligibility process.

CONCLUSION

DHS has made tremendous strides in providing shelter to individuals in need while also significantly reducing the number of New Yorkers living on the street. We have no interest in undermining this success or creating unnecessary barriers to shelter for eligible applicants. Our eligibility process is designed with the special needs of our clients in mind and is equipped with the necessary safeguards to ensure that those in need of shelter receive it.

I'm now happy to take your questions.

Testimony of
Coalition for the Homeless
and
The Legal Aid Society
on

**Proposed Shelter Eligibility Rules for
Homeless Single Adults**

Presented before

The New York City Council
Committee on General Welfare

Patrick Markee, Senior Policy Analyst
Coalition for the Homeless

Judith Goldiner, Attorney-in-Charge, Law Reform Unit – Civil Practice
The Legal Aid Society

November 9, 2011

Coalition for the Homeless and the Legal Aid Society welcome this opportunity to testify before the New York City Council regarding the enormous dangers of the City's proposed new shelter eligibility rules for homeless single adults.

About the Coalition and The Legal Aid Society

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

The Coalition operates 12 direct-services programs that offer vital services to homeless, at-risk, and low-income New Yorkers, and demonstrate effective, long-term solutions. These programs include supportive housing for families and individuals living with AIDS, job-training for homeless and formerly-homeless women, rental assistance which provides rent subsidies and support services to help working homeless individuals rent private-market apartments, 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 distributes 900 nutritious meals each night to street homeless and hungry New Yorkers. Finally, our Crisis Intervention Department assists more than 1,000 homeless and at-risk households each month with eviction prevention assistance, client advocacy, referrals for shelter and emergency food programs, and assistance with public benefits.

The Coalition also represents homeless men and women as plaintiffs in Callahan v. Carey and Eldredge v. Koch. In 1981 the City and State entered into a consent decree in Callahan in which it was agreed that, "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 monitor of municipal shelters for homeless adults.

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

The Legal Aid Society has performed this role in City, State and federal courts since 1876. It does so by capitalizing on the diverse expertise, experience, and capabilities of 900 of the brightest legal minds. These 900 Legal Aid Society lawyers work with 600 social workers, investigators, paralegals and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in 25 locations in New York City, the Society provides

comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel.

The Society'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 the Society'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, the Society's law reform representation for clients benefits some 2 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 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 with children.

Proposed New Shelter Eligibility Rules for Homeless Single Adults in New York City

Amidst all-time record homelessness, high unemployment, the ongoing and increasingly acute affordable housing shortage, and the lingering effects of the economic crisis, the Department of Homeless Services offers nothing in the way of solutions to address New York City's historic homelessness crisis.

Instead, the Department proposes to implement new shelter eligibility rules that are in violation of the consent decree in the landmark case Callahan v. Carey and that will have the effect of denying emergency shelter to some of the most vulnerable New Yorkers.

To make matters worse, the Department plans to implement this radical and unlawful restriction on access to shelter only days before Thanksgiving and as the winter cold approaches — thus putting homeless adults who would inevitably be denied shelter under the new rules at enormous risk of injury or death on the streets.

We want to thank the City Council for convening this hearing on such a short notice, given the emergency nature of the Department's precipitous action. The Department announced its plan to upend 30 years of homeless policy last Thursday night, without giving any notice to the City Council or the public and in violation of the New York City Charter, which was adopted by a direct vote of the people of New York City and requires a period of notice to the public and interested parties, who might have offered comments on the dangers this rule change presents.

The Department made no attempt whatsoever to solicit input from Councilmembers, community organizations, or individuals who have such a high stake in how the City treats homeless individuals. Had there been ample time, we have no doubt that they too would be here to raise

their voices, insights and critical appraisals of the plans announced less than one week ago. The Department's failure to follow the notice and comment provisions of the law cuts to the heart of participatory democracy in New York City: whether the Executive Branch has unbridled authority to make such dramatic changes in local rules that will harm thousands of New Yorkers without regard to lawful procedures.

There is no question that the Department's proposed shelter eligibility rules will sharply restrict access to shelter for homeless men and women, particularly people living with mental illness and other disabilities. And there is no question that the new rules will result in more homeless New Yorkers sleeping on the streets, in the subway system, and in other public spaces. We urge the City immediately to withdraw the rules, and failing that, we urge the New York City Council to take every step to halt the implementation of the rules.

Background on Callahan v. Carey and the Legal Right to Shelter

When modern homelessness first emerged in the late 1970s, thousands of homeless New Yorkers were forced to fend for themselves on the streets, and many died or suffered terrible injuries. In 1979 co-founders of the Coalition for the Homeless brought a class action lawsuit in New York State Supreme Court against the City and State called Callahan v. Carey, arguing that a constitutional right to shelter existed in New York. In particular, the lawsuit pointed to Article XVII of the New York State Constitution – an amendment which was enacted in the midst of the Great Depression – which declares that "the aid, care and support of the needy are public concerns and shall be provided by the state and by such of its subdivisions...."

The lawsuit was brought on behalf of all homeless men in New York City. The lead plaintiff in the lawsuit, Robert Callahan, was a homeless man suffering from chronic alcoholism who lived on the streets in the Bowery section of Manhattan.

On December 5, 1979, the New York State Supreme Court ordered the City and State to provide shelter for homeless men in a landmark decision that cited Article XVII of the New York State Constitution.

In August 1981, after nearly two years of intensive negotiations between the plaintiffs and the government defendants, Callahan v. Carey was settled as a consent decree (please see copy attached to this testimony). By entering into the decree, the City and State agreed to provide shelter and board to all homeless men who met the need standard for public assistance or who were homeless "by reason of physical, mental, or social dysfunction."

Thus the decree established a right to shelter for all homeless men in New York City, and also detailed the minimum standards which the City and State must maintain in shelters, including basic health and safety standards. In addition, Coalition for the Homeless was appointed monitor of shelters for homeless adults. (A companion lawsuit, Eldredge v. Koch, extended the right to shelter to homeless single women, who are now protected by the consent decree.)

One tragic footnote to the history of the litigation is the fate of Robert Callahan himself. The autumn before the consent decree bearing his name was signed, Mr. Callahan died on Manhattan's Lower East Side while sleeping rough on the streets. Thus Robert Callahan himself was one of the last homeless victims of an era with no legal right to shelter.

DHS' Proposed New Eligibility Rules Violate the Callahan v. Carey Consent Decree

Over three decades, the Callahan v. Carey consent decree has formed the bedrock of New York City's approach to homelessness, and has literally saved the lives of countless homeless New Yorkers. Unlike in other cities, where homeless people are routinely turned away from emergency shelter due to bureaucratic barriers or insufficient capacity, in New York City homeless adults by and large have been able to secure shelter from the elements thanks to the legacy of Robert Callahan.

Now the Department of Homeless Services seeks to undermine one of the fundamental protections of New York's longstanding legal right to shelter.

The first paragraph of the 1981 consent decree in Callahan v. Carey states:

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 [i.e., public assistance] established in New York State; or (b) the man by reason of physical, mental or social dysfunction is in need of temporary shelter.

The Department's proposed new shelter eligibility procedure for homeless single adults (see copy attached to this testimony) fails to comply with this core provision of the consent decree. Under the proposed eligibility rules, homeless adults with mental, physical, or social dysfunction can and would be denied emergency shelter in multiple ways.

For instance, under the new eligibility rules the Department can and would deem a homeless person "ineligible" for shelter:

- Even when a family member with whom the homeless person lived in the past states verbally and in writing that the person can no longer live in their home;
- Even when an outreach worker or police officer escorts the homeless person to an intake shelter but the Department claims the person has "not cooperated" with an eligibility investigation;
- Even when the homeless person is unable to provide a complete one-year "housing history";
- Even when the homeless person attempts to document his or her one-year housing history, but the family or friend with whom s/he resided refuses to cooperate with the Department's eligibility investigation;
- Even when the homeless person, who may suffer from a mental or physical impairment, fails to undergo an evaluation for such an impairment;
- Even when the Department claims that the homeless person's other "housing option" is another person's public housing apartment (or some other subsidized housing) and the homeless person's residency jeopardizes the primary tenant's subsidized housing;

- Even when DHS investigators have never visited an alleged “housing option” to see if it is actually available and/or suitable to meet the needs of the homeless person;
- Even when the homeless person is unable to produce documentation of their income or past housing history;
- Even when DHS makes a mistake in determining the homeless person’s eligibility for shelter but the homeless person cannot re-apply for shelter because s/he cannot produce “new evidence”; and
- Even when the “housing option” identified by DHS is unsafe but the homeless person has allegedly failed to provide evidence of the safety hazards.

The proposed eligibility rules are flawed and dangerous enough on their face, but even more when one considers that the population that would be affected – homeless single men and women – is characterized by very high incidence of mental illness and other serious health problems. Indeed, numerous research studies – including some commissioned by the City itself – have found high rates of serious and persistent mental illness, addiction disorders, HIV infection, and other serious health problems among homeless adults residing both in shelters and on the streets. In addition, a large percentage of homeless women have been victims of domestic violence.

Thank you for the opportunity to share this testimony. And, as always, we look forward to working with the Committee and the City Council in the coming months and years on efforts to reduce New York City’s homeless population and help homeless children and adults.

Submitted by,

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coalition
for the
homeless

The Callahan Consent Decree

Establishing a Legal Right to Shelter for Homeless Individuals in New York City

Following is the complete text of the 1981 consent decree in Callahan v. Carey, the class action litigation brought by Coalition for the Homeless that established a legal right to shelter for homeless individuals in New York City. The Callahan litigation was filed in 1979 on behalf of homeless men in New York City, and argued that a right to shelter for the homeless existed under the New York State Constitution. The right to shelter was extended to homeless women by Eldredge v. Koch (1983), also brought by Coalition for the Homeless, and to homeless families with children by the McCain /Boston cases, brought by the Legal Aid Society.

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF NEW YORK

ROBERT CALLAHAN, CLAYTON W. FOX,
THOMAS DAMIAN ROIG, JAMES HAYES,
JAMES SPELLMAN and PAULE E. TOOLE,
on their own behalves and on behalf
of all others similarly situated,

Plaintiffs,

-against-

HUGH L. CAREY, as Governor of the State
of New York, BABARA BLUM, as Commissioner
of the New York State Department of Social
Service, EDWARD I. KOCH, as Mayor of the
City of New York, JAMES A. KRAUSKOPF, as
Commissioner of the New York City Human
Resources Administration, and CALVIN REID,
as Director of the Shelter Care Center
for Men,

Defendants.

Index No.
42582/79

FINAL
JUDGMENT
BY CONSENT

Plaintiffs Robert Callahan, Clayton Fox and Thomas Roig, having brought this action on October 2, 1979 challenging the sufficiency and quality of shelter for homeless men in New York City, and plaintiffs Callahan, Fox, Roig, James Hayes, James Spellman and Paul Toole, having filed their Amended Complaint on March 31, 1980, and

defendants Hugh L. Carey, as Governor of the State of New York, and Barbara Blum, as Commissioner of the State of New York Department of Social Services (the "State defendants"), having filed their Amended Answer on January 19, 1981 therein denying the material allegations of the Amended Complaint, and defendants Edward Koch, as Mayor of the City of New York, Stanley Brezenoff, as Administrator of the New York City Human Resources Administration, and Calvin Reid, as director of the Shelter Care Center for Men (the "Men's Shelter") (the "City defendants"), having filed their Amended Answer on January 19, 1981 therein denying the material allegations of the Amended Complaint, and Plaintiffs and defendants by their respective attorneys, having consented to the entry of this Final Judgment without any final adjudication of any issue of fact or law herein and without this Final Judgment constituting any evidence or admission by any party hereto with respect to any such issue:

NOW, therefore, without final adjudication of any issue of fact or law herein and without this Final Judgment constituting any evidence or admission by any party hereto with respect to any issue, and upon consent of all parties, it is hereby

ORDERED, ADJUDGED and DECREED as follows:

Provision of Shelter

1. 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.

Shelter Standards

2. The City defendants shall provide shelter at facilities operated in accordance with the standards set forth in this paragraph as soon as practicable and not later than September 1, 1981. The term "shelter facility" refers to the Keener Building, Camp LaGuardia, the Men's Shelter and any other facility used by the City defendants to shelter homeless men. This paragraph does not apply to the Bowery lodging houses (Palace, Kenton, Union, Sunshine, Delevan and Stevenson) presently used by the City defendants to shelter homeless men (the "hotels"); if the City defendants choose to shelter homeless men in any additional Bowery lodging house, they will advise counsel for the plaintiffs and a good faith effort shall be made by plaintiffs and the City defendants to agree to operating standards for such facilities.

(a) Each resident shall receive a bed of a minimum of 30 inches in width, substantially constructed, in good repair and equipped with clean springs.

(b) Each bed shall be equipped with both a clean, comfortable, well-constructed mattress standard in size for the bed and a clean, comfortable pillow of average size.

(c) Each resident shall receive two clean sheets, a clean blanket, a clean pillow case, a clean towel, soap and toilet tissue. A complete change of bed linens and towels will be made for each new resident and at least once a week and more often as needed on an individual basis.

(d) Each resident shall receive a lockable storage unit.

(e) Laundry services shall be available to each resident not less than twice a week.

(f) A staff attendant to resident ratio of at least 2 per cent shall be maintained in each shelter facility at all times.

(g) A staff attendant trained in first aid shall be on duty in each shelter facility at all times.

(h) A minimum of ten hours per week of group recreation shall be available for each resident at each shelter facility.

(i) Residents shall be permitted to leave and to return to shelter facilities at reasonable hours and without hindrance.

(j) Residents of shelter facilities shall be provided transportation (public or private) to enable them to return to the site where they applied for shelter.

(k) Residents of shelter facilities shall be permitted to leave the facility by 7:00 a.m. if they so desire.

(l) Residents shall be permitted to receive and send mail and other correspondence without interception or interference.

(m) The City defendants shall make a good faith effort to provide pay telephones for use by the residents at each shelter facility. The City defendants shall bear any reasonable cost for the installation and maintenance of such telephones.

3. The capacity of shelter facilities shall be determined as follows:

(a) The capacity of newly constructed shelter facilities shall comply with the standards set forth in Appendix A, except in cases of emergency need as defined in Appendix B.

(b) The City defendants shall disclose to plaintiffs' counsel any plan to convert an existing structure to a shelter facility and the intended capacity for the facility at least 30 days in advance of the implementation or execution of any such conversion plan. A reasonable capacity for each such facility shall be established. The standards set forth in Appendix A shall be used as guidelines in determining whether the planned capacity of the City defendants is reasonable.

(c) Effective December 31, 1981, the capacity of the Keener Building shall not exceed _____ except in cases of emergency need as defined in Appendix B, in which case the maximum number of men who may be sheltered in the Keener Building is _____. Between the date of entry of this judgment and December 31, 1981, the capacity of the Keener Building shall not exceed_____.

(d) The capacity of Camp LaGuardia shall comply - by construction of new dormitory buildings - with the standards set forth in Appendix A, except in cases of emergency need as defined in Appendix B, as soon as practicable and not later than December 31, 1982, except that the individual rooms in the "Main Building" may be used as sleeping rooms for one person each. The construction start of such new dormitory buildings shall occur no later than March 1, 1982.

Bowery Lodging Houses

4. Hotels presently used by the City defendants shall meet the following standards at the time of entry of this judgment and the City defendants shall maintain such standards thereafter:

(a) Each resident shall receive a bed, a clean mattress, two clean sheets, one clean blanket, one clean pillow and one clean pillow case. A complete change of bed linens (sheets and pillow case) shall be made for each new resident and at least once a week and more often as needed on an individual basis.

(b) Each resident shall be supplied with a clean towel, soap and toilet issue. A clean towel shall be provided to each new resident and towels shall be changed at least once a week and more often as needed on an individual basis.

(c) There shall be two trained security guards in the Palace Hotel between the hours of 8:00 p.m. and 4:00 a.m. and one trained security guard between the hours of 4:00 p.m. and 8:00 p.m., and 4:00 a.m. to 8:00 a.m. There shall be one trained security guard in the Kenton Hotel between the hours of 4:00 p.m. and 8:00 a.m. These security guards shall file with the City defendants incident reports on any incidents of violence or attempted violence occurring in the hotels.

(d) Showers shall be available at the Men's Shelter beginning at 7 a.m. and signs advising hotel residents of that fact shall be posted at the front desk in each hotel and at the door of each bathroom in each hotel. Persons showering at the Men's Shelter shall be provided adequate supervision (including safeguarding of personal property), a clean towel, soap and, if requested, a delousing agent.

(e) A lockable storage unit of adequate size to store personal property shall be available either at the Men's Shelter or at the hotels for each man sheltered by the City defendants at hotels.

(f) Heat shall be maintained in accordance with New York City guidelines for rental residences.

(g) Cleanliness shall be maintained throughout the hotels at all times.

Intake Centers

5. The City defendants shall accept applications for shelter at the Men's Shelter, 8 East Third Street, New York, New York and at 529 Eighth Avenue, New York, New York (the "central intake center"). Applications for shelter shall be accepted at all times at the Men's Shelter, and applications for shelter shall be accepted at 529 Eighth Avenue between the hours of 5:00 p.m. and 1:00 a.m., seven days per week. The City defendants shall provide direct transportation to shelter pursuant to paragraph 1, supra. The 529 Eighth Avenue intake center, shall be opened as a central intake center not later than September 1, 1981.

6. The City defendants shall operate additional satellite intake centers on a 24-hour basis Monday through Friday at the following locations:

(a) Harlem Hospital Center, 506 Lenox Avenue, New York, New York;

(b) King County Hospital Center, 451 Clarkson Avenue, Brooklyn, New York;

(c) Lincoln Hospital, 234 East 149th Street, Bronx, New York; and

(d) Queens Hospital Center, 82-69 164th Street, Jamaica, New York.

Men seeking shelter at the satellite intake centers shall be provided adequate fare for public transportation and clear written directions to either (i) a shelter facility, or (ii) a central intake center - according to the preference of the person seeking shelter. The City defendants shall provide direct transportation from the satellite intake centers to a shelter facility to all men who appear so physically or mentally disabled that they are unable to reach a shelter facility by public transportation. Satellite intake centers shall be opened not later than September 1, 1981. It is understood that the above satellite intake centers shall be operated in conjunction with borough crisis centers. In the event that the borough crisis center program is terminated, the City defendants may, in their discretion, reduce the hours of operation of the satellite intake centers to between 5 p.m. and 1 a.m.

7. The City defendants shall accept applications for shelter at shelter facilities providing that such applicants have applied for and have been found eligible for shelter by the City defendants within six months of the time of application at a shelter facility. Shelter facilities shall also provide shelter for one night to any person who has not previously applied for shelter who seeks shelter at a shelter facility after 8:00 p.m.

Community Participation

8. Each shelter facility, central intake center and satellite intake center, shall utilize the services of available community members to the maximum reasonable extent. These persons are not City employees or volunteers in a City sponsored program within the meaning of section 50(k) of the General Municipal Law and such persons shall execute statements to this effect.

Information

9. The City defendants shall provide applicants for shelter with clear written information concerning other public assistance benefits to which they may be entitled at the time applicants apply for shelter.

Compliance Monitoring

10. Defendant Krauskopf shall appoint qualified employees with no administrative responsibility for providing shelter to monitor defendants' shelter care program for men with respect to compliance with this decree.. These employees shall visit each shelter facility, central intake center, satellite intake center and hotel at least twice a month and will submit to defendant Krauskopf a written report at least twice a month describing compliance or lack thereof with each provision of the decree. These reports shall be made available to plaintiffs' counsel upon reasonable notice.

11. Plaintiffs' representatives shall have full access to all shelter facilities, central intake centers and satellite intake centers, and plaintiffs' counsel shall be provided access to any records relevant to the enforcement and monitoring of this decree.

12. Defendant Krauskopf shall deliver by hand each day to plaintiffs' counsel a statement listing:

- (a) The number of men who applied for shelter at each central intake center and at each satellite intake center;
- (b) The number of men who were provided shelter at each shelter facility or hotel;
- (c) The number of men who were denied shelter at each shelter facility, central intake center and satellite intake center and the reason for each such denial;
- (d) The number of men who were accepted for shelter at each central intake center and satellite intake center who did not reach a shelter facility; and
- (e) The number of men who were provided direct transportation from each satellite intake center to a shelter facility.

13. It is the intention of defendant Krauskopf to conduct daily inspections of the Palace Hotel and to deliver reports of such inspections each day to plaintiffs. It is also the intention of defendant Krauskopf to conduct inspections of the other hotels used by defendants to shelter homeless men not less than three times per week and to deliver reports of such inspections not less than three times a week to plaintiffs' counsel. A sample of the inspection report form to be used is attached hereto as Exhibit C.

No Waivers

14. Nothing in this judgment permits any person, not-for-profit corporation, charitable organization, or governmental entity or subdivision to operate a shelter, as defined in New York Code of Rules and Regulations, Title 18, § 485.2(C), in violation of the requirements of the New York Social Services Law, Title 18, of the New York Code of Rules and Regulations, or any other applicable law.

15. Nothing in this judgment should operate or be construed as res judicata or collateral estoppel so as to foreclose any signatory party from any claim or defense in any subsequent administrative or judicial proceeding.

16. Nothing in this judgment shall be deemed to authorize or to prevent the operation by the New York City Human Resources Administration of the Keener Building on Wards Island as a shelter or shelter facility after October 15, 1981, except in accord with a valid contract or agreement among the New York State Department of Social Services, the New York State Office of Mental Health and the New York City Human Resources Agency and with an operating certificate issued by the New York State Department of Social Services.

17. The Commissioner of the New York State Department of Social Services agrees to reimburse the New York City Human Resources Agency for the operation of a shelter facility or shelter facilities referred to in this judgment pursuant to New York Social Services Law 153, except if such shelter facility fails to comply with the requirements for shelters contained in the New York Social Services Law or the New York Code of Rules and Regulations, Title 18; provided that nothing in this judgment can or does obligate the Legislature of the State of New York to appropriate funds.

18. Nothing in this judgment shall prevent, limit or otherwise interfere with the authority of the Commissioner of the New York State Department of Social Services to enforce and carry out her

duties under the New York Social Services Law, Title 18, of the New York Code of Rules and Regulations, or any other applicable law.

Continuing Jurisdiction

19. Jurisdiction is retained by this Court for the purpose of enabling any of the parties to this Final Judgment to apply to this Court at any time for such further orders and directions as may be necessary or appropriate for the construction, modification, or termination of this entire judgment or of any applicable provisions thereof, for the enforcement of compliance therewith, and for the punishment of violations thereof.

New York, New York
August 1981

Appendix A

Space Requirements for Shelters for Adults

(1) Every facility shall have space for dining and leisure activities.

(2) Sleeping areas shall not be considered as dining or leisure areas.

(3) Space provided for dining shall be:

(i) at least 120 square feet in facilities with a certified bed capacity of less than 10 beds;

(ii) at least 12 square feet for each additional certified bed.

(4) Space provided for leisure areas shall be:

(i) at least 120 square feet in facilities with a certified bed capacity of less than 10 beds.

(ii) at least 12 square feet per bed in facilities with a certified bed capacity of 10 or more beds

(5) When not in use, dining space may be used, with written approval from the New York State Department of Social Services ("Department"), as leisure space.

(6) An operator may request Department approval of a waiver to reduce the square footage requirements for dining and leisure space. A waiver shall be granted only upon demonstration by the operator that the food service and the program needs of residents can be met.

(7) Baths and Toilet Facilities

There shall be a minimum of one toilet and one lavatory for each six residents and a minimum of one tub or shower for each ten residents.

(8) Sleeping Rooms

(i) In single occupancy sleeping rooms, a minimum of 80 square feet per resident shall be provided;

(ii) In sleeping rooms for two or more residents, a minimum of 60 square feet per resident shall be provided;

(iii) A minimum of 3 feet, which is included in the per resident minima, shall be maintained between beds and for aisles;

(iv) Partitions separating sleeping areas from other areas shall be ceiling high and smoke tight;

(v) All bedrooms shall be:

(a) above grade level;

(b) adequately lighted;

(c) adequately ventilated;

(vi) light and ventilation for bedrooms shall be by means of windows in an outside wall;

(vii) bedrooms shall open directly into exit corridors;

(viii) bedrooms may not be used as a passageway, corridor or access to other bedrooms.

(9) Adequate storage space for cleaning supplies and equipment shall be provided.

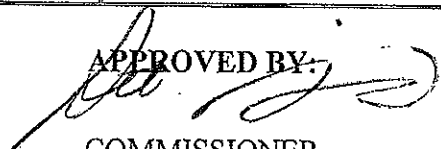
Appendix B

Short term emergency shelter may be provided to a number of persons in excess of the capacity of the facility provided that all of the following conditions are met:

- (1) Snow emergencies, excessive cold or other similar circumstances create an emergency need for additional shelter space;
- (2) The operator is able to meet the food and shelter needs of all persons in residence;
- (3) The facility remains in compliance with applicable local building, fire protection and health and sanitation codes;
- (4) The operator advises plaintiffs' counsel of the maximum number of persons to be cared for during an emergency situation in any facility as soon as possible after an emergency situation develops;
- (5) The operator provides shelter to additional persons no more than 30 days in any calendar year; and
- (6) The operator maintains records which document adherence to these conditions.

NEW YORK CITY DEPARTMENT OF HOMELESS SERVICES

PROCEDURE NO. 12-400

SUBJECT: SINGLE ADULTS ELIGIBILITY PROCEDURE	APPLICABLE TO: SINGLE ADULT INTAKE FACILITIES	EFFECTIVE DATE: November 14, 2011
ADMINISTERED BY: ADULT SERVICES DIVISION		APPROVED BY:  COMMISSIONER

I. PURPOSE

This Procedure sets forth the standards by which DHS Single Adult Intake facilities ("DHS") will determine whether individuals who apply for Temporary Housing Assistance ("THA") are eligible for temporary emergency shelter pursuant to the *Callahan* Consent Decree and New York State Social Services Regulation 18 N.Y.C.R.R. Section 352.35 ("Regulation"), 94 ADM-20, 96 ADM-20, and 05 ADM-07.

This Procedure is consistent with the purposes underlying the Regulation as further delineated in 94 ADM-20; namely, that:

- shelter is a costly yet critical benefit, the supply of which is not unlimited; therefore, social services districts, such as New York City, must ensure that THA is being provided only to persons who have no other available housing or the means to secure other housing; and
- the applicant has responsibilities to cooperate with the assessment conducted by the City and to use available resources and/or seek necessary assistance to avoid homelessness wherever possible; therefore, each applicant must clearly demonstrate that s/he is faced with an immediate need for THA, has made reasonable efforts to secure housing and cannot access any other housing even on a temporary basis.

To implement the Regulation's purposes and to execute the City's responsibilities as delineated in the *Callahan* Consent Decree, DHS will utilize this Procedure to determine whether an applicant for THA is an eligible homeless person. This determination will be based on an assessment of whether the applicant has a viable housing option where s/he can live even on a temporary basis and/or whether s/he possesses sufficient financial resources to secure such housing. (See Section III, below). This Procedure also sets forth the requirements with which applicants for shelter must comply in order to receive THA. (See Section II, below)

II. INVESTIGATION OF ELIGIBILITY

In order to determine each applicant's eligibility for THA, DHS will investigate whether the applicant has other available housing or the means to obtain other housing.

A. DHS Obligations

DHS will base its eligibility determination on the totality of the applicant's circumstances, with an analysis of each applicant's situation in accordance with all relevant factors, including those enumerated in Section III, below.

DHS will conduct a thorough review of the applicant's situation and available housing resources including conducting a face-to-face interview with the applicant; in-person or telephone interviews with third parties who may be sources of housing for the applicant; review of relevant documents and information; and, field investigations when necessary.

NYS Office of Temporary and Disability Assistance 94 ADM-20 at pages 22 to 22.1, as amended on December 27, 1996, states as follows:

As a general rule, individuals and families must be responsible for making their own housing arrangements. Districts have a limited ability to provide housing and are neither expected nor obligated to provide temporary housing assistance unless it is clearly demonstrated that the person requesting assistance is faced with an immediate need for housing, has made reasonable efforts to secure housing and cannot access any other housing even on a temporary basis.

Each district must provide temporary housing assistance only to persons who can establish that they are without housing at the time assistance is requested and have sought and cannot access any other housing even on a temporary basis. Persons who resided in their own or shared housing immediately prior to requesting temporary housing are presumed to not be in immediate need of assistance except in cases where a fire, flood or other sudden emergency has rendered the previous housing uninhabitable. Such persons must establish that they cannot return to their prior housing.

DHS will document its eligibility determination and the findings on which it is based in the applicant's case record, and provide the applicant with written notice of the Agency's findings that documents the reason(s) for the agency's determination.

If an applicant is not able to complete the application/investigation process due to mental or physical impairment or if the DHS staff person interviewing the applicant has reason to believe the applicant may be suffering from mental or physical impairment that is impairing his/her ability to participate in the application/investigation process, a licensed social worker will assess

the applicant to determine if the applicant is able to cooperate with the process. This assessment can occur at any time during the application and investigation process. If no licensed social worker is on site at the time of the application and an applicant with verified or suspected mental or physical impairment is experiencing difficulty complying with or completing the application process, his/her immediate need for shelter will be met until the assessment can occur. Should the applicant's condition prevent him/her from being able to complete the application and investigation process, licensed staff will work with the applicant to determine whether s/he has a viable housing option. If this is the case and the applicant is found ineligible for THA, DHS staff will, when necessary, arrange transportation to the housing option and arrange support services, as needed.

B. Applicant Obligations

As detailed in 94 ADM-20 and 96 ADM-20, all applicants for THA are required to cooperate with DHS' eligibility process by providing all information and documentation necessary to determine the applicant's eligibility for THA. If the applicant is unable to produce required documentation, s/he must explain the reason. Without a valid reason, failure to produce documentation constitutes a failure to cooperate. Where the applicant needs assistance in obtaining information or documentation relevant to the verification of eligibility, DHS will assist the applicant to obtain such information and documentation.

NYS Office of Temporary and Disability Assistance 94 ADM-20 at page 22.1, as amended on December 27, 1996, goes on to state what the obligations of the applicant are when applying for THA:

All applicants must demonstrate by clear, convincing and credible evidence that they have actively sought and are unable to access any other temporary or permanent housing, including housing in which they had previously resided and temporary accommodations provided by friends or relatives.

When an applicant has left shared housing, factors such as the duration of the stay, nature of the relationship of the applicant and the primary tenant, conditions in the household and the credibility of the applicant and the primary tenant all must be considered, and a determination of eligibility made based upon the totality of the circumstances.

A primary tenant's claim, oral or written, that the family can no longer reside in the shared housing is not, by itself, sufficient to establish that the housing is no longer available.

All applicants must cooperate in completing an assessment of their need for THA by, among other things, providing information regarding their prior housing arrangements and financial resources. 96 ADM 20 (pages 4-5) states that "when an individual or family fails to cooperate in

completing the assessment, and the failure is not due to a verified mental or physical incapacity of the individual or family member, the SSD must deny THA.”

III. ELIGIBILITY CRITERIA

DHS will determine whether an applicant is eligible for THA based on the totality of the circumstances underlying each individual’s application for shelter. Depending on the applicant’s stated reasons for seeking shelter, DHS will consider the following factors.

A. Available Housing Option(s)

DHS shall investigate all residences where the individual has resided in the year prior to the date of the application for temporary housing assistance. In addition, based on the totality of the circumstances DHS may consider an address to be viable even if the applicant resided there previous to the year prior to the date of application. In order for DHS to find the individual ineligible because of other available housing, the credible evidence must establish that other housing is available to the individual at one or more specified locations. DHS must provide the individual with a written decision explaining the reasons for its eligibility determination.

An individual cannot elect to be homeless, for eligibility purposes, by not utilizing other resources to obtain housing. DHS may explore a housing resource for availability and propose additional actions, either on the part of the individual or a primary tenant, to make the housing option suitable for the applicant to reside there on a temporary or permanent basis. Examples of such proposed actions include reconfiguring furniture or sleeping arrangements.

A primary tenant’s claim, oral or written, that the applicant can no longer reside in the viable housing option is not, by itself, sufficient to establish that the housing is no longer available (as stated in 94 ADM-20, page 22.1)

Residential treatment, including detoxification services, deemed necessary by a qualified DHS staff person or third party evaluator shall be considered an available housing option, albeit a temporary one, that meets the applicant’s immediate need for housing provided that a bed can be secured.

DHS will investigate whether any of the locations in the applicant’s one-year housing history is an available housing option. The eligibility determination will assess the totality of the applicant’s circumstances, including the factors listed below:

1. Tenancy

If an applicant has tenancy rights at any housing option, that residence will be deemed the viable housing option and the applicant will be found ineligible, provided there is no imminent threat to health or safety. Other situations related to tenancy will be addressed as follows:

- a. Other Housing - If an applicant has a viable housing option in supportive housing, community residence, nursing home, adult home, SRO, or other similar institutional or community living situation but elected to leave for reasons other than imminent threat to health or safety, s/he will be found

ineligible, provided there are no active orders of protection or vacate orders that would prevent his/her return.

- b. Eviction - If an applicant states that s/he cannot return to a viable housing option because s/he was evicted or the primary tenant (PT) was evicted, DHS will investigate this claim by asking the applicant or the PT to provide evidence of the eviction, such as a Marshal's Notice of Eviction. In the case of an impending eviction, DHS will contact the Marshal to ascertain when the eviction will occur. Absent an eviction, the viable housing option is an available housing resource even if only on a temporary basis.

Documentation of prior steps in the eviction process, such as a petition filed in the Housing Part of NYC Civil Court indicating that a proceeding is pending to evict the applicant or PT, is not sufficient to show unavailability of the viable housing option since a court has not yet ruled on the landlord's petition for relief. A summary dispossess notice is also not sufficient to show unavailability since a tenant can cure the purported breach of the lease before an eviction proceeding is effective.

A THA applicant's choice to vacate a housing option voluntarily prior to eviction (e.g., to return their keys) will not necessarily preclude this address from being considered a viable housing option. If the housing is still available, the applicant will be expected to retrieve their previously submitted keys from the landlord and reside at that address until the event of a formal eviction actually occurs.

- c. Non-Lease Tenancy Rights - If an applicant gives as a reason for homelessness that s/he cannot return to a viable housing option because s/he is not on the lease, DHS will assess whether this is a valid occupancy restriction that would render the viable housing option unavailable. Ultimately, the burden is on the applicant to establish that a viable housing option is not available.

2. Overcrowded/Unsafe Conditions

If an applicant gives as a reason for homelessness that s/he cannot return to a viable housing option because it is overcrowded or unsafe, DHS will investigate the claim. DHS will assess information obtained from the applicant as well as the primary tenant or other members of the primary tenant's household (collectively, "PT") about the conditions, the physical layout and the other occupants of the viable housing option.

3. Domestic Violence

DHS will immediately refer applicants who allege they are victims of, or at risk of, domestic violence ("DV") to HRA's No Violence Again ("NoVA") unit where a trained domestic violence

counselor will interview them. If an applicant is referred to NoVA, DHS may meet the applicant's immediate need for shelter (in a borough other than where the alleged abuse occurs) until NoVA renders its determination. DHS will suspend its investigation during the pendency of the NOVA investigation. In the event NoVA precludes a particular housing option, DHS will find the housing option unavailable to the applicant; however, preclusion of a particular housing option does not in and of itself render the applicant eligible for THA unless DHS determines that the applicant has no other available housing or the means to obtain it. If NOVA finds the single adult to be in need of domestic violence services but there is no room in a DV shelter, the applicant will be found eligible for shelter.

4. Health and Safety

If (1) an applicant gives as a reason for homelessness that s/he cannot return to a housing option because returning there would pose an immediate and significant threat to the health or safety of the applicant; or (2) the PT states that the applicant's return to the housing option poses such a threat to the PT's health or safety, DHS will investigate such claims by referring the applicant to an appropriate medical or social services professional for evaluation to determine whether the applicant or PT has an impairment that would render the housing option unavailable to the applicant.

B. Financial Resources

DHS will conduct an investigation of each applicant's financial resources to determine whether the applicant has financial resources sufficient to obtain other housing. The purpose of this section of the Procedure is to comply with 96 ADM-20, which directs local social service districts to "ensure that THA is being provided only to persons who have no other available housing *or the means to secure other housing*" (96 ADM-20, page 2, emphasis added.) An applicant for THA who has significant income or assets, even if s/he finds him/herself without a place to live, will be expected to use the income and/or assets to secure temporary housing while searching for a more permanent housing situation.

1. Income

DHS will apply the appropriate income and resource guidelines to determine eligibility for safety net assistance, including emergency safety net assistance. Applicants who are ineligible for safety net assistance due to income may be deemed ineligible for temporary housing assistance.

2. Assets

Any single adult applicant with on-hand assets in excess of \$2,000 must utilize his/her resources to reduce or eliminate his/her need for emergency shelter. On hand assets include, but are not limited to, cash, checking accounts, savings accounts, and certificates of deposits. This standard conforms to the long-standing asset test used by the New York City Human Resources Administration (HRA) to determine eligibility for cash assistance for single adults in the community.

When assessing assets, applicants must produce bank statements or other documentary evidence of available assets.

DHS will seek to verify the information produced by the applicant or find unreported assets through a review of HRA databases, Worker Connect, and other available data sources, including but not limited to Lexis/Nexis.

3. Financial Resources Determination

If an applicant's income or assets exceeds one or both of the eligibility thresholds described above, the applicant may be found ineligible for THA and served with a 4002 Notice of Action ("4002 Notice") denying his/her application for THA. However, in the event that an applicant's income or assets is not immediately available at the time of the application but will become available in the near future, DHS shall meet the applicant's immediate need for shelter while conducting an investigation and ensuring that the resources in fact become available.

IV. APPLICATION AND ELIGIBILITY DETERMINATION PROCESS

A. Diversion and Bridging Efforts

Prior to or concurrent with the application process, DHS will provide applicants with preventive services designed to assist the applicant to return to the community and therefore avoid the need for THA. Applicants will be referred to diversion staff from HRA and/or other on or off-site diversion and prevention services that are appropriate for the applicant's situation. The diversion services are aimed to assist applicants in exploring options other than shelter and availing themselves of opportunities to remain housed in the community.

B. Application

Applicants will complete a Temporary Housing Application (THA) and an Intake or Eligibility Determination Questionnaire (EDQ) that collects a one year housing history. This application will also contain a release that the applicant must sign authorizing DHS to disclose and collect medical and other personal information in conducting its eligibility investigation. As per 96 ADM-20 at page 4, applicants:

must cooperate in securing requested documentation for such things as income, resources, unavailability of alternate housing, and physical or mental incapacity, collateral sources of documentation if necessary, etc. to enable [DHS] to determine eligibility for [shelter].

If [the applicant] is unable to produce required documentation, they must be able to explain the reason. Where the applicant needs assistance in obtaining information or documentation relevant to the verification of eligibility, [DHS] will attempt to assist the applicant to obtain such documentation.

Applicants who do not comply with the application process will be found ineligible based on non-cooperation, unless the reason for non-cooperation is mental or physical impairment as assessed by a qualified mental health or medical professional.

C. Investigation

DHS eligibility staff will conduct telephone interviews with relevant contacts for each residence listed on the one-year housing history in order to verify the dates and conditions of the applicant's stay.

Field investigations will be conducted at DHS's discretion. DHS may choose to conduct a field investigation when an applicant makes an allegation of overcrowded or unsafe conditions that cannot be verified over the phone or through collateral sources.

For the purpose of an eligibility determination, potential housing options will not be limited to the information that is reported in the one-year housing history. Information that is obtained via the investigation may also reveal a viable housing option for an applicant (e.g., a house owned by the applicant where the applicant has not lived for more than one year.)

D. Eligibility Recommendation

Based on these Adult Eligibility Guidelines and the totality of the circumstances surrounding the application, DHS Eligibility Specialists will make an eligibility recommendation to the Supervisor. The possible eligibility recommendations are as follows:

1. Eligible – the applicant is in need of THA.
2. Ineligible – the applicant is not in need of THA or has been non-cooperative.
3. Investigation incomplete/Meet the applicant's immediate need for THA while completing the investigation – the investigation is still underway and the applicant's immediate need for THA will be met until a determination can be made.

E. Supervisory Review and Approval

In all cases, a DHS supervisor must review the findings of the investigation and approve the recommended determination. Where DHS staff is unsure as to what determination should be made, they should consult with a supervisor or, if a supervisor is unavailable, a member of the DHS Office of Legal Affairs. All supervisory approvals must be indicated by a dated signature and be retained in the case record.

F. Written Notice of Determination

DHS must provide all applicants with notification of DHS' determination. Notification must be provided in the form of a 4002 Notice, which will include a description of the applicant's appeal rights. For denials of THA, the 4002 Notice will include a reason for DHS' determination, a statement of the applicant's right to an agency conference pursuant to Section V below, and a description of the applicant's appeal rights.

G. Non-Cooperation Due to Mental or Physical Impairment

DHS will follow the guidance of 96 ADM-20 (page 4) in addressing applicants who claim or appear to have mental or physical impairment:

Where physical or mental incapacity is claimed, or suspected by the SSD, it may require the applicant to participate in an evaluation to determine if a physical or mental impairment is present.

Lack of cooperation is grounds under 96 ADM-20 (pages 4-5) to determine an applicant ineligible:

When an individual or family fails to cooperate in completing the assessment, and the failure is not due to a verified mental or physical incapacity of the individual or family member, the SSD must deny THA.

To implement this directive, DHS will include in the eligibility staffing pattern licensed social workers who will be available when an applicant claims to have a mental or physical impairment or when an eligibility specialist suspects that an applicant has such an impairment. The role of the licensed social worker will be to assess the applicant and render a determination whether the applicant is able to cooperate in the investigation.

If the assessment results in a determination that the applicant is capable of cooperating and completing the investigation, the investigation will resume as quickly as possible.

If, on the other hand, the licensed social worker finds that the applicant has a mental or physical impairment that prevents the applicant from cooperating with the investigation or using his/her available income or assets, the licensed social worker will make a determination whether the applicant needs to be referred immediately for medical services or whether they are able to be safely served in the shelter system. Applicants who need immediate medical intervention will be referred to an appropriate provider. Applicants who are deemed unable to cooperate with the investigation but can be served safely in the shelter system will be referred back to the eligibility specialist and the applicant's immediate need for shelter will be met until the investigation can be completed.

If an applicant's condition prevents him/her from being able to complete the application and investigation process *and* s/he has a viable housing option, DHS staff will work with the applicant to return him/her to the housing option, provided it is a safe and suitable option. In this instance, DHS will, where necessary, arrange transportation to the housing option and refer the applicant to support services as needed.

DHS will arrange for licensed social workers to be available during periods when large numbers of applicants are entering intake. If no mental health staff is on site at the time of the application and an applicant with claimed or suspected mental or physical impairment is experiencing difficulty cooperating or completing the application process, his/her immediate need for shelter will be met until the assessment can occur.

V. AGENCY CONFERENCE REGARDING DENIALS OF THA

DHS staff shall inform on the 4002 Notice all applicants determined ineligible for THA that they are entitled to a DHS conference. During the conference, a DHS official who was not directly involved in making the original eligibility determination will (i) review the determination made

by DHS staff; (ii) permit the applicant to present any new information or documentation relevant to the determination; and (iii) accept any documents submitted by the applicant. After the conference, DHS shall uphold the prior determination, render a new and different decision, or meet the applicant's need for temporary shelter while DHS investigates new information provided by the applicant during the conference.

VI. FAIR HEARINGS

On the 4002 Notice, DHS shall inform all applicants for THA that they have a right to request a State Fair Hearing before an administrative law judge to appeal DHS' decision. Applicants who request a Fair Hearing will not be granted THA while the hearing is pending.

VII. RE-APPLICANT PROCEDURE

DHS will use the guidance of 05-ADM-07 to address the issue of re-applications for THA made within a 90-day time period. When assessing any re-applicant's immediate need for THA, DHS will consider threats to the health and safety of the re-applicant, the sufficiency of available information concerning the re-applicant's eligibility for THA, and the possibility that material changes(s) may have taken place since the time of the previous application.

A. Action to Be Taken by DHS

If a current applicant has previously applied for THA within the past 90 days and been found ineligible because of an available housing resource, DHS will meet this re-applicant's immediate need for THA when:

1. The re-applicant asserts new facts establishing that the re-applicant is a victim of domestic violence and the alleged perpetrator of the violence lives in the same residence where the re-applicant lived immediately prior to submitting the application or is aware of the re-applicant's current address and presents a clear and ongoing threat to the re-applicant; or,
2. The re-applicant asserts new facts establishing that the re-applicant or the PT has been evicted from the residence where the re-applicant lived immediately prior to submitting the application.

B. Supervisory Review and Approval

A DHS Supervisor must review the assessment and approve the determination of whether the applicant has an immediate need for shelter. Where DHS staff is unsure as to what determination should be made, they should consult with a supervisor or, if a supervisor is unavailable, a member of the DHS Office of Legal Affairs.

C. Written Notice of Determination

DHS must provide all re-applicants with notification of its determination. Notification must be provided in the form of a 4002 Notice, which will include a reason for the determination.

D. Eligibility Investigation for Re-Applicants

DHS will investigate the re-applicant's assertions during the course of its eligibility investigation pursuant to the processes described in this Procedure.

For The Record

Testimony for General Welfare Committee Hearing on "New Homeless Shelter Eligibility Policy"

November 9, 2011

Megan Crowe-Rothstein, LMSW
Director of Social Work, Mental Health Project
Urban Justice Center
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646.602.5665

My name is Megan Crowe-Rothstein and I am the Director of Social Work at the Urban Justice Center's Mental Health Project. We work with low-income and poor people with mental health issues to try to stop the cycle of homelessness, incarceration, and hospitalization by advocating for access to treatment, benefits, and housing. We believe that not only should every person have the right to stable and safe housing, but that stable and safe housing is essential to a person's mental health stability and well-being. We believe that people with psychiatric disabilities should be housed in supportive housing with services that meet their needs. However, because the City lacks sufficient supportive housing for people with mental illness, the Department of Homeless Services' emergency and temporary shelter system is often, and increasingly so, the last option before an individual is forced to sleep on the street. People who face psychiatric disorders are at significant risk of decompensating when they are forced to live on the street, sleep in subways, or return to a home that is not a safe environment.

We vehemently oppose the proposed new eligibility procedures for single adults entering into DHS shelters. The family shelter system's use of similar procedures has had disastrous effects on parents and children. Focusing on people with mental illness, years of experience shows us that this very process of determining eligibility discriminatorily and grossly mistreats people whose lives are already overwhelmed with their mental health symptoms and poverty. It is completely illogical and unfair to put the burden on an individual who is homeless and has a mental illness to *prove* his or her eligibility for last-resort shelter. While the issued procedure (No. 12-400) states that special accommodations will be made for people with mental illness, the terms are vague and it appears that, perhaps through a slightly longer process, ultimately people with mental illness will still be forced to prove their eligibility. Screening one's ability to "cooperate with the investigation" at the time of entering the shelter will not address people whose symptoms of mental illness leading up to entering the shelter makes it impossible to prove eligibility. We know that parents with mental illness are kicked out of family shelters when unable to produce documentation and forced to return to very unsafe living conditions, sometimes even in homes where there is an order of protection prohibiting contact and yet preferable to living on the street.

While it is inhumane to cut services for the most in need and oppressed members of our community in the name of saving the City money, I want to emphasize that this will surely cost the City much in the long-term. The vast majority of people who enter the shelter system have literally nowhere else to sleep, and yet some will be unable to meet the burden placed on them by DHS to prove their eligibility for shelter. This change in procedure will result in more people with mental illness being hospitalized in psychiatric units because the stress of being homeless is extremely destabilizing. For instance, a woman we serve will undoubtedly end up in a psychiatric Emergency Room if she is found ineligible for shelter, as she will not be able to cope with her depression on the street. Others will be arrested and held in City jails for petty, perhaps only quality-of-life crimes, often related to their mental illness and poverty. Another client with schizophrenia was arrested for sleeping in a hospital waiting room because he had nowhere else to stay. The City is well aware that people with mental illness are disproportionately represented in the criminal justice system and currently make up roughly a third of the population in City jails - the number will only grow if more people are turned away from shelter. From a purely economic standpoint, "housing" people in hospitals or jails is much more expensive than in shelters, or, for that matter, in permanent housing! From a humanitarian standpoint, turning people away from the shelter system is unconscionable, and it should not take people sleeping on the streets, returning to unsafe housing, becoming hospitalized or incarcerated to prove the absurdity of this policy.



moving victims of violence from crisis to confidence

Testimony of

**Michael Polenberg
Vice President, Government Affairs
Safe Horizon, Inc.**

Oversight: New Homeless Shelter Eligibility Process for Single Adults

**General Welfare Committee
Hon. Annabel Palma, Chair**

New York City Council

November 9, 2011

Thank you, Chairwoman Palma and members of the Committee, for the opportunity to testify before you today on the new homeless shelter eligibility process for single adults. My name is Michael Polenber, and I am the Vice President for Government Affairs for Safe Horizon, the nation's leading victim assistance organization and New York City's largest provider of services to victims of crime and abuse, their families and communities. Safe Horizon creates hope and opportunities for hundreds of thousands of New Yorkers each year whose lives are touched by violence.

We are very concerned that the City's Department of Homeless Services (DHS) proposal to enact tough new eligibility requirements for single adults applying for shelter will have a deleterious impact on victims of violence and abuse. In particular, we are worried about victims of domestic violence and homeless youth. Individuals from both populations at times turn to the DHS shelter system when no other options (HRA-funded domestic violence shelter, DYCD-funded youth shelter) are available. The new eligibility requirements may very well preclude victims of violence and abuse from entering the DHS shelter system, leaving victims to fend for themselves and possibly encounter additional abuse on the streets or even to return to their batterer. We strongly urge DHS to reconsider this proposal.

Victims of Domestic Violence

Safe Horizon operates three 24-hour hotlines for victims of domestic violence, rape and sexual assault, and other crimes. Counselors provide crisis counseling, safety planning, assistance with finding shelter, referrals to Safe Horizon programs or other organizations, advocacy with the police, and other crucial services.

Safe Horizon is also New York City's largest provider of domestic violence residences for battered women and men, with more than 700 beds available throughout the five boroughs. Safe Horizon operates both emergency shelters for crisis situations and transitional housing where families may stay for several months in order to plan for a future free from violence. The shelters offer comprehensive services including counseling, housing assistance, life skills and parenting courses as well as childcare and medical aid.

From operating both of these systems, we know that roughly 37% percent of the nearly 150,000 annual calls to our 24-hour domestic violence hotline are from single adults looking for beds in domestic violence shelters. We also know that the configuration of domestic violence shelters is overwhelmingly designed for families, with only a few scattered beds available at any given time for single adults. It is not unusual, then, for Safe Horizon and other service providers to refer single adults to the DHS system until a bed opens up in domestic violence shelter.

The eligibility procedure to be implemented by DHS notes that persons for apply for shelter in the single adult shelter system and who identify as victims of domestic violence will be referred to HRA's "No Violence Again" (NoVA) Unit, where the individual will be able to speak to a "trained domestic violence counselor." But unlike the PATH central intake center for homeless families where a NoVA unit is on-site, the single adult intake shelters do not have on-site NoVA units. Will a woman who applies for shelter in the Brooklyn intake shelter in East New York and who identifies as a victim of domestic violence be told to apply instead at the PATH office halfway across the city in the Bronx? Will clients be transported to the PATH

office, or be expected to make their own way? Can the NoVA unit accommodate a large increase in demand for services? Can we be absolutely certain that no action will be taken by DHS staff to verify one's homelessness until a screening by a domestic violence counselor takes place? The procedure is silent on this issue, which is of great concern.

We are also concerned about the eligibility for shelter for single adults who time out of their stay in domestic violence shelters. Victims of domestic violence can reside in HRA-contracted domestic violence shelters for 90 days, with the possibility of a 45-day extension. Extensions beyond 135 days are rare – for single adults, they are all but impossible. In an analysis of the first nine months of 2011, one of our colleagues found that 32% of the 1,100 households in the sample entered DHS shelters after timing out of the HRA system. For single adults, the percentage entering DHS shelters was 25%.

Unless there has been a new incident of domestic violence, one cannot re-enter the DV shelter system. So what will DHS tell these individuals? Will calls be made to their last residence, where the batterer likely lives, risking an escalation of domestic violence? Will that apartment be considered a “viable housing option” if the batterer says she can return? Again, the procedure is unclear on this point.

Runaway and Homeless Youth

Since 1984, Safe Horizon has provided services and emergency shelter to runaway and homeless youth, the great majority of whom have experienced abuse in their lives. Our clients are typically survivors of family violence and childhood trauma at home or foster care

placements, and returning to these former residences is rarely an option. With strong support from the City Council, Safe Horizon operates a 24-bed overnight shelter program in Harlem, drop-in centers in Harlem and the Lower East Side, and an overnight street outreach program across all five boroughs.

Many of the young people we see are old enough to enter the DHS shelter system, but for a host of reasons would prefer to access the youth shelters funded by DYCD and the City Council. But while there are approximately 3,800 homeless young people in New York City on our streets each night, there are just over 200 crisis beds designed to meet the unique needs of this population. On any given night, thousands of youth are forced to scramble for one of those coveted beds. Since most are unable to access any of the youth crisis beds they find alternatives – street homelessness, survival sex work in trade for a place to sleep, abandoned buildings, or the DHS shelter system. Youth are sometimes reluctant to enter the DHS shelter system due to the wide age disparity, the prevalence of insensitive and inappropriate behavior, and the risk of experiencing violence, bullying and homophobia.

For homeless young people, the new eligibility procedure is particularly troubling. Providing a housing history requires the young person to discuss some very difficult issues with DHS staff – the addresses where a bed was offered in exchange for sex or where they were abused by a family member, for example, or in violation of building policy (such as NYCHA or supportive housing) that puts the prime tenant at risk of eviction. Furthermore, young homeless people often suffer from depression, anxiety disorders, post-traumatic stress disorder, suicidal ideation and other mental health issues. Traumas from violence and homelessness can make it

particularly difficult for homeless youth and adults to piece together a coherent and accurate housing history. This is a burden that will push away many youth who are fearful or unable to go through their recent past, or who are fearful of service providers in general. Ultimately, we fear that the new procedure will deter many homeless youth from engaging in services at all and lead them to remain on the streets where the risk of disease, violence and even death remains unacceptably high.

Recommendations

Safe Horizon recommends that DHS revisit this policy in light of the harm it is likely to inflict on victims of domestic violence and on homeless youth. We are heartened by the statements of Chairwoman Palma and Speaker Quinn that “our charge is to find ways to help these people – not to send them into the streets with nowhere to turn for help.” We thank this Committee and the full City Council for holding this hearing and for championing those who would be harmed by this new policy. I would be happy to answer any questions you may have.

Testimony of Karen Jorgensen, Director
Valley Lodge Transitional Shelter
West Side Federation For Senior and Supportive Housing, Inc.

Hearing of the General Welfare Committee of the City Council
November 9, 2011

Re: Proposed new DHS procedures for eligibility of single adults for shelter .

Thank you for the opportunity to testify this afternoon.

My name is Karen Jorgensen and I have been the director of the Valley Lodge Shelter for 23 and a half years. We are part of the New York City shelter system and serve 92 men and women 50 years of age and over who suffer from mental and physical disabilities.

I am shocked that the Department of Homeless Services is instituting an eligibility requirement similar to that in the family system. I have read the new procedures and I am afraid for the safety of our most vulnerable New Yorkers.

Many of the people now at Valley Lodge would have had great difficulty establishing eligibility for shelter if these procedures had been in place when they were admitted.

The procedures say that "Applicants will complete a Temporary Housing Application and an Intake or Eligibility Determination questionnaire that collects a one year housing history. This application will also contain a release that the applicant must sign authorizing DHS to disclose and collect medical and other personal information in documenting its eligibility investigation." . . . Further: "Applicants who do not comply with the application process will be found ineligible based on non-cooperation, unless the reason for non-cooperation is mental or physical impairment as assessed by a qualified mental health or medical professional."

Our first task should be to get people off the street and into safety. A history of "non-cooperation" is often one of the reasons people are homeless in the first place. They do not trust others, they do not want to sign their name to permission forms and they are not going to want to admit to a history of mental illness or prior psychiatric hospitalizations. In fact, people will go out of their way to minimize any history of disability. Assessments by "qualified mental health or medical

professionals” are not a foolproof means of making sure that no one with disabilities will be denied shelter. Many’s the time I have seen mental status evaluations from assessment shelters that specify no psychiatric diagnosis for clients. Then when they arrive at Valley Lodge, serious psychiatric issues come to light. People are often able to “pull it together” in an initial examination, but the true nature of their disabilities reveals itself over time.

I recently interviewed a woman from an assessment shelter who said that she had been evicted from a Housing Authority apartment near Valley Lodge. She had no ID (all of it stolen), she said that her eviction papers were stolen, and she refused to sign a permission form allowing me to talk to the Housing Authority about her case. She stated that she had been spending the night in the subways until eventually entering the shelter system. I am concerned that if the current procedures were implemented, this woman might have been denied shelter for “non-cooperation.”

I am very concerned that these new procedures fail to mention any special provisions for periods of severe weather conditions, known as Code Blue (severe cold) and Code Red (severe hot weather). Will people deemed to be ineligible for shelter be ordered to leave no matter the weather?

There is a difference between placement and diversion. In 2010, the Department of Homeless Services began to implement a much needed addition to the Rules of the City of New York – a chapter entitled “Single Adult Permanent Housing Referral Criteria.” This change would not have occurred without the work of this Committee. Under the new regulation, shelters are denied credit for making placements to substandard facilities, that is facilities found to be on certain lists maintained by the FDNY, Buildings Dept., HPD, and the New York State Department of Health. Many of these now prohibited referral sources were unlicensed residences known as three-quarter houses that had come to the attention of the City and State because of serious health and safety violations. I am afraid that, under these new eligibility procedures, there will be nothing to stop unscrupulous operators from opening new, as yet unknown three-quarter houses and making their availability known to DHS, resulting in people seeking shelter being diverted – not placed – **diverted** to facilities that are substandard. As I have mentioned, the City Council, and in particular the General Welfare Committee, played a major role in getting the rules changed to bar placements to substandard housing. I urge the members of the Committee to be aware of this threat to the progress that has been made.

This proposed change is being put forth as a cost-cutting measure. I am hoping that the Committee has had an opportunity to view the budget for the implementation of these procedures, which would appear to require quite a number of additional investigators and licensed social workers to handle the eligibility examinations.

As a shelter director, I have not been informed officially by DHS about the new eligibility procedure, although the effective date is November 14, 2011, this coming Monday. I have not been told how these new rules will relate to our shelter, which is not an assessment shelter.

In the past, when DHS has implemented new procedures, there have been special mandatory training sessions for staff, as well as explanatory materials. This has certainly been the case for the new CARES computerized information system for the adult and family shelter system. CARES is replacing a system used for over 25 years in adult shelters. Our staff has attended numerous mandatory trainings in preparation for the CARES system. The latest information I have received from DHS is that CARES will be going live in mid-November at intake sites.

The decision to require an eligibility determination for single shelter clients is a momentous one. To inaugurate this change at the same time as the CARES system is being introduced – and as winter approaches – does not make sense. Will the staff of individual assessment shelters be trained to assess eligibility, or will there be a separate PATH-type facility doing the assessment, as in the family system? What kinds of training will be provided to staff before this policy is implemented? Who will be trained? These are all questions that need to be answered.

Karen Jorgensen
Director, Valley Lodge
West Side Federation For Senior and Supportive Housing, Inc.
149 W. 108 St.
New York, NY 10025
Phone: 212-678-0570
Fax: 212-678-0877
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Mr. Seth Diamond-the current Commissioner of the Department of Homeless Services-proposes to implement an administrative decision denying shelter to persons who will now enter the Cities shelter system when that person or persons' can seek shelter from a family member who will provide shelter to that person/persons. Indeed, this very policy is the current policy now employed against families that enter the cities shelter system.

This administrative policy flies in the face of the Callahan agreement which the Department of Homeless Services adopted some time ago, i.e., that those who seek shelter SHALL be provided with that service. This archaic implemented policy undermines as well as attempts too do away with the Callahan agreement thus placing ALL those seeking shelter at risk. Will the many doorways, alleys and other areas, most notably our transportation system (subways) become a place of refuge for those who seek a place to sleep/rest for the night,ect.

In sum, we advocates demand that Mr. Diamond rethink and further abandon the implementation of this absurd policy, and we advocates also demand that the City Counsel impose upon Mr. Diamond via the implementation of a resolution honoring the Callahan agreement, i.e., that shelter shall be provided to all who seek it ,not to deny it.

**THE COUNCIL
THE CITY OF NEW YORK**

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I represent: DATS

Address: _____

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Name: Judith Goldner

Address: _____

I represent: Legal Aid Society

Address: 199 Water St

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I represent: Xavier Mission

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I represent: _____

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Address: 1218 Hoe Ave

I represent: A SHELTER RESIDENT

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Name: William Bond

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I represent: Great Young Adult Center

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Name: TERRY GRACE

Address: 530 E 76th St

I represent: Faith Based Emergency Shelter Network

Address: _____

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Name: Christy PARKIE

Address: 270 E 2nd St

I represent: Homeless Services United

Address: 270 E 2nd St

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Name: PATRICK MARKEE

Address: 129 FULTON ST., NY, NY 10038

I represent: COALITION FOR THE HOMELESS

Address: 5

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Name: MS. KENTALL B. JACKMAN

Address: 2427 MORRIS AVENUE #22L BX NY 10468

I represent: PICTURE THE HOMELESS

Address: 2427 MORRIS AVENUE 2ND FL BX NY 10468

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(PLEASE PRINT)

Name: Megan Crowe-Rothstein

Address: URBAN JUSTICE CENTER NYC

I represent: _____

Address: _____

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(PLEASE PRINT)

Name: Michael Polenberq

Address: SAFE HORIZON

I represent: _____

Address: _____

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(PLEASE PRINT)
Name: Nancy Downing

Address: _____

I represent: Covenant House

Address: _____

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Date: 11/9/11

(PLEASE PRINT)
Name: Karen Jorgensen

Address: Valley Forge - 149 W 108 St. NYC

I represent: Valley Forge - West Side Federation 10025

Address: Valley Forge - West Side Federation
149 W 108 St. NYC 10025

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(PLEASE PRINT)
Name: Andy Lopez

Address: HOMELESS

I represent: SELF & homeless 134445

Address: D

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