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**BRIEFING PAPER OF THE JUSTICE AND HUMAN SERVICES DIVISIONS**

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**Hon. Donovan Richards, Jr., Chair**

**COMMITTEE ON GENERAL WELFARE**

**Hon. Stephen Levin, Chair**

**January 21, 2020**

**Oversight: NYPD Subway Diversion Program**

1. **INTRODUCTION**

 On January 21, 2020, the Committee on Public Safety, chaired by Council Member Donovan Richards, Jr., and the Committee on General Welfare, chaired by Council Member Stephen Levin, will hold a hearing on the NYPD Subway Diversion Program. Among those expected to testify include representatives from the New York City Department of Social Services (DSS), the New York City Police Department (NYPD or the department), community organizations, and members of the public.

1. **THE SUBWAY DIVERSION PROGRAM**

In June 2019, the de Blasio Administration announced a multi-agency pilot program described as offering an alternative pathway into transitional and permanent housing by offering homeless individuals in the subway system services in lieu of summonses.[[1]](#footnote-1) The new initiative, the Subway Diversion Program, targets those who are unsheltered in the subway system and who are observed to be in violation of the City’s Transit Code of Conduct rules, such as not paying the fare, or being “outstretched”. According to the Administration, individuals engaged by the police who are deemed to be in violation will have their summons cleared provided they complete an assessment with an outreach team and receive a referral to shelter or services. Those who opt for a referral to services are escorted by the NYPD to one of four Manhattan district offices run by provider Bowery Residents’ Committee (BRC) to complete an assessment. Once completed, the individual is to give their summons to the BRC outreach team and, in coordination with the MTA and the NYPD, will work to clear it.[[2]](#footnote-2) Once the assessment of eligibility for services is complete, the individual may receive a referral for placement at an appropriate setting such as shelter intake, a Safe Haven or Drop-In services.[[3]](#footnote-3) It is unclear at what point the summons is cleared and whether that is contingent upon accepting the referral that BRC makes. Therefore, the person may simply return to the subway system.

In August 2019, the Administration announced the expansion of the pilot program to all five boroughs as well as the launch of an interagency Joint Crisis Coordination Center.[[4]](#footnote-4) The Joint Crisis Coordination Center consists of the New York City Department of Health and Hygiene, Health and Hospitals, as well as HOME-STAT outreach teams and Transit Police to develop “targeted interventions” for those who are unsheltered in the subway system.[[5]](#footnote-5) The program expansion also adds joint canvassing efforts where Transit Police officers will accompany outreach workers, whereas the previous practice consisted largely of HOME-STAT teams focusing on high activity stations and the NYPD focusing primarily on engaging individuals on subway cars.[[6]](#footnote-6) The Joint Crisis Coordination Center will also employ system-wide live Transit Bureau CCTV feeds to monitor and inform the deployment of NYPD and outreach teams throughout the system in real time.[[7]](#footnote-7) The use of live CCTV monitoring in this way is a new practice, according to the NYPD, historically using live subway feeds for major events and using feeds for review following a crime.[[8]](#footnote-8) This will be the first time there is a 24/7 monitoring of the subway at a centralized site like the Joint Crisis Coordination Center and while NYPD declines to say which stations are being monitored, cameras will be added in areas where there is need.[[9]](#footnote-9) As of October 2019, there were approximately 120 incidents responded to since the launch of the coordination center that were deemed “quality of life” issues, such as waking up sleeping passengers on a subway platform.[[10]](#footnote-10)

1. **THE STREET HOMELESS POPULATION**

The U.S. Department of Housing and Urban Development (HUD) defines unsheltered individuals as those “having a primary nighttime location [that] is a public or private place not designated for, or ordinarily used as, a regular sleeping accommodation … such as the streets, vehicles or parks.”[[11]](#footnote-11) The HUD-mandated Homeless Outreach Population Estimate Count (the “HOPE Count”) identified 3,588 unsheltered individuals in New York City in 2019. Of those unsheltered individuals, 2,178 were on the subways.[[12]](#footnote-12) Individuals experiencing street homelessness are typically single adult males.[[13]](#footnote-13) A high percentage are over the age of 50 years .[[14]](#footnote-14) They have higher rates of physical health issues in part due to their age and also due to exposure to the harshness of living on the streets without access to routine medical care.[[15]](#footnote-15) Unsheltered individuals also have higher rates of mental and behavioral health issues and substance use disorders.[[16]](#footnote-16) In Fiscal Year (FY) 2019, the leading causes of death among unsheltered individuals in New York City were drug-related causes (29%) followed by heart disease (16%), alcohol misuse/dependence (9%), accidents (7%), and cancer (4%).[[17]](#footnote-17)

A subset of individuals experiencing street homelessness who have been unsheltered for an extended period are sometimes referred to as the chronically homeless. The City defines the chronically homeless as those who have lived on the street or subway for nine months of the past two years.[[18]](#footnote-18) Chronic street homeless individuals have more entrenched needs, as their physical and mental health conditions are complicated by of the length of time they have been living on the streets[[19]](#footnote-19) without access to routine medical, mental health, and dental care.[[20]](#footnote-20) They also often mistrust others and public institutions because of repeated attempts to navigate street homelessness and the complicated government services systems.[[21]](#footnote-21) Accordingly, they are often less responsive to traditional outreach efforts, such as offers of a warm meal or a night in shelter,[[22]](#footnote-22) and street outreach workers must repeatedly engage them to develop a rapport, bond, and trust.[[23]](#footnote-23)

Individuals living on the streets often report that they are more likely to enter a safe haven than a traditional shelter.[[24]](#footnote-24) A safe haven is a facility operated by the New York City Department of Homeless Services (DHS) or a DHS-contracted organization that provides low-threshold, harm-reduction transitional housing to chronic street homeless individuals to reduce barriers to coming inside from the streets.[[25]](#footnote-25) The housing is considered low-threshold because it is less restrictive to enter[[26]](#footnote-26) and does not require individuals to participate in treatment programs.[[27]](#footnote-27) Currently, there are 18 safe havens in the City.[[28]](#footnote-28) On January 6, 2020, 1,067 individuals were utilizing a safe haven bed.[[29]](#footnote-29) The de Blasio Administration announced in December 2019 plans to open an additional 1,000 safe haven beds, bringing the total of safe haven and stabilization beds to approximately 2,800.[[30]](#footnote-30)

1. **LEGAL AUTHORITY TO DETAIN INDIVIDUALS**

The authority of police officers or other government officials to arrest or detain individuals is specifically limited by state law and the U.S. Constitution’s prohibition against unreasonable searches and seizures. In New York State, the authority to arrest, with or without a warrant is governed by the Criminal Procedure Law (“CPL”).[[31]](#footnote-31)

Most commonly, police officers are authorized to arrest an individual without a warrant when the officer has probable cause to believe the individual committed an offense[[32]](#footnote-32), which can range from a felony, misdemeanor, or violation enumerated under the Penal Law, to a traffic offense defined under the vehicle and traffic law, or to other offenses defined in other substantive areas of state or local law that create criminal penalties.[[33]](#footnote-33)

While common for most felonies and certain misdemeanors, an arrest does not necessarily require the officer to detain the individual for the purpose of immediately bringing the individual before a criminal court judge. For example, the CPL provides for the issuance of Desk Appearance Tickets (“DAT”), whereby the individual is taken into custody but released from the precinct and ordered to appear on a future date in court to face formal charges.[[34]](#footnote-34) The CPL also allows officers to file criminal charges through the use of a criminal court summons, which, like a DAT, instructs the individual to appear in court to answer charges on a future date. The main legal difference between a DAT and a summons is that the summons is in and of itself a legally valid charging document. In terms of the court process, that distinction is minimal: with respect to both forms of issuing process, the individual is required to appear in criminal court on a certain date and failure to appear will result in an arrest warrant. Warrants resulting from summonses has been a significant and persistent problem in New York City: as of February 2019 there were over 750,000 active summons warrants, which is 64% of all active warrants.[[35]](#footnote-35)

Whether the individual is directed to appear in court by a DAT, a summons or an officer with handcuffs, the penalties and consequences of a criminal prosecution are the same, depending on the charge. However, the practical difference as implemented by the NYPD is significant in the context of the Subway Diversion Program. Penal law offenses require an officer to fingerprint an individual, which in turn requires transportation to a police precinct even if the individual is ultimately deemed eligible for a Desk Appearance Ticket. In contrast, an officer who observes an individual committing a state law violation, or local misdemeanor, such as the ones subject to the Subway Diversion Program, is not required to do so: the officer may issue the summons on the spot, and there is no legal need to transport the individual to the precinct.

Outside of the context of criminal activity, New York State law grants legal authority to detain individuals in narrowly defined circumstances. Article 9 of the Mental Hygiene Law governs hospitalizations of the mentally ill, including involuntary admissions and mandated outpatient treatment based on what is commonly known as Kendra’s Law. A police officer may take into custody any person who appears to be mentally ill and is conducting himself or herself in a manner which is likely to result in serious harm to the person or others, and remove the person to a hospital, or detain the person in a safe place and notify the appropriate medical authorities who can determine whether the individual should be involuntarily committed.[[36]](#footnote-36) Police officers may also detain individuals who have failed to comply with Assisted Outpatient Treatment that has been specifically ordered by a Judge pursuant to Kendra’s Law.[[37]](#footnote-37)

In either scenario, state law requires a medical professional and/or a Judge to determine that an individual is in need of mandated treatment, which could include civil commitment or outpatient treatment. In contrast, the Subway Diversion program neither requires a judicial or clinical evaluation to determine service needs, nor does it require officers to apply any legal standard in order to evaluate need.

Police officers may also issue civil summonses when the conduct amounts to a civil rather than criminal offense. These summonses direct individuals to appear at the Office of Administrative Trials and Hearings (OATH), where the proceedings may result in a civil fine, but not in a criminal conviction or jail penalty.

 According to the Administration press release when the program was announced, the summonses that are being issued in connection with this program are based on violations of the New York City Transit Code of Conduct rules.[[38]](#footnote-38) Those rules may be enforced as either civil or criminal penalties.[[39]](#footnote-39)

1. **RECENT TRENDS IN LOW LEVEL ENFORCEMENT**

In recent years, the City has taken steps to reduce the harms and collateral consequences of the criminal justice system. In 2016, the New York City Council passed the Criminal Justice Reform Act (CJRA), which sought to create proportional penalties for some low-level, non-violent offenses including public consumption of alcohol, public urination, littering, unreasonable noise, and some NYC Park Rules offenses.[[40]](#footnote-40) CJRA created new policies that provided police officers with the option of issuing a civil summons in lieu of a criminal summons.[[41]](#footnote-41) While CJRA creates a presumption that civil summonses should be issued, there are exclusionary criteria, such as having an open warrant, that allow officers to issue a criminal summons.[[42]](#footnote-42) Civil Summonses are adjudicated by OATH. OATH allows respondents of summons to contest the charges by phone or online, to perform community service instead of paying a fine, and has extended evening and weekend hours.[[43]](#footnote-43)

As a result of the CJRA, there continues to be a decline in the issuance of criminal summons for the applicable offenses. According to Data Collaborative for Justice (formerly Misdemeanor Justice Project at John Jay College of Criminal Justice), in the first year after implementation 89% of summons issued for the CJRA offenses were civil. Unlike criminal summons, civil summons do not result in a permanent criminal record nor is a warrant issued if a person does not appear in court.[[44]](#footnote-44)

1. **ADVOCATE RESPONSE TO THE SUBWAY DIVERSION PROGRAM**

Shortly after the start of the Subway Diversion Program, homeless advocates expressed concern with the program. The Coalition for the Homeless released a statement saying in part, “The NYPD’s misguided new policy will only serve to further criminalize homeless New Yorkers through useless summonses.”[[45]](#footnote-45) The New York Civil Liberties Union[[46]](#footnote-46) and Police Reform Organizing Project[[47]](#footnote-47) expressed similar concerns of the City using law enforcement for a problem that calls for social services, as well as affordable and supportive housing.

Some advocates expressed concern about the surveillance of those who appear homeless through the Joint Crisis Coordination Center. Christine Quinn, president of WIN, stated, “The use of surveillance cameras in fighting hate crimes can be very effective…But the command center for homelessness is further attempting to criminalize poverty. Homeless people are not criminals.”[[48]](#footnote-48) The Coalition for the Homeless also conveyed similar concerns, stating that targeting a specific population through surveillance is problematic and would not accomplish the goal of establishing trust among a service-resistant population.[[49]](#footnote-49)

The process for creating the Diversion Program has also faced scrutiny. An attorney with the Legal Aid Society’s Homeless Rights Project stated that starting the diversion process with a summons is counterproductive to establishing the trust needed to encourage those who are unsheltered to accept services and called the program “coercive.”[[50]](#footnote-50) Catherine Trapani from Homeless Services United expressed a similar sentiment, stating that officers threatening to issue a summons unless a person talks to an outreach worker “are not setting that outreach worker up for success.”[[51]](#footnote-51) A group of anonymous homeless outreach workers stated in a *Gothamist* opinion article that the program means “more harassment and forced relocation for people sleeping on subways.”[[52]](#footnote-52) They went on to say, “Asking homeless people to move from whatever warm nook on the street or train they’ve found without providing them with housing wastes everyone’s time.”[[53]](#footnote-53)

The Subway Diversion Program offers more outreach, but not more service options, which can be problematic if those who are experiencing homelessness have chosen to avoid the shelter system. The Coalition for the Homeless’ stated, “People avoid services and shelters for a variety of legitimate reasons, the most important being the shortage of safe, welcoming shelter beds and permanent and supportive housing.[[54]](#footnote-54) The 30th Street Men’s Intake Center in particular has a reputation for being violent and unwelcoming, and this is the only intake center for single men in the city.[[55]](#footnote-55) The news outlet *The City* conducted its own outreach to New Yorkers experiencing street homelessness and were told “in interview after interview” that “they’d rather take their chances on trains or sidewalks” than enter the shelter system. [[56]](#footnote-56) While the recent announcement by the de Blasio Administration that an additional 1,000 safe haven beds will be opened has been viewed as a positive step in the right direction, some expressed concern about the feasibility in getting these beds up and running considering delays in previous safe haven beds that were promised in the fall of 2015.[[57]](#footnote-57) While the safe havens are being sited and developed, those who encounter the Subway Diversion Program are not being offered any new sheltering options.

1. **ISSUES AND CONCERNS**

The Committees seek to understand the goals of the Subway Diversion Program and the ways in which the implementation of the program has the potential to achieve those goals. One concern that must be addressed is whether the issuance of criminal or civil summonses is an appropriate incentive for a population of individuals who by definition lack the resources and tendency to obtaining services can be expected to appear for scheduled court dates and pay fines in order to avoid arrest warrants and civil judgments that further drive them into poverty. According to the Data Collaborative for Justice, the warrant rate for summonses that would ultimately diverted to OATH under CJRA was approximately 50% city wide. That rate can only be expected to be higher for the street homeless population.

In addition, the Committees would like to learn how NYPD and DHS evaluate the effectiveness of the program, whether more unsheltered people are receiving services, and whether the program is actually resulting in fewer summonses. It is unclear whether the program seeks to screen individuals who would nevertheless have been charged with transit offenses for service needs, or whether officers are being directed to seek out apparently homeless individuals for the purpose of issuing summonses that are then withdrawn if the individual accepts services.

Additionally, the Committees would like to explore the relationship between the new command center and the Subway Diversion Program, specifically whether it could result in targeting of street homeless individuals and more summonses rather than more services.

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5. *Id.* [↑](#footnote-ref-5)
6. *Id.* [↑](#footnote-ref-6)
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8. Gonen, Yoav. “Subway Surveillance Cameras Turned Toward the Homeless,” Oct. 3, 2019, The City, <https://thecity.nyc/2019/10/subway-surveillance-cameras-turned-toward-the-homeless.html> [↑](#footnote-ref-8)
9. *Id.* [↑](#footnote-ref-9)
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11. U.S. Dept. of Housing and Urban Development, The 208 Annual Homeless Assessment Report (AHAR) to Congress, Part 1: Point-In-Time Estimates of Homelessness (December 2018), *available at* <https://files.hudexchange.info/resources/documents/2018-AHAR-Part-1.pdf>. [↑](#footnote-ref-11)
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14. *Id.* [↑](#footnote-ref-14)
15. *Id.* [↑](#footnote-ref-15)
16. *Id.* [↑](#footnote-ref-16)
17. Bureau of Vital Statistics, NYC Dept. of Health and Mental Hygiene, Fourteenth Annual Report on Homeless Deaths, July 1, 2018 – June 30, 2019. [↑](#footnote-ref-17)
18. NYC Mayor’s Office of Operations, NYC HOME-STAT, Stakeholder Research Insights Report, Documenting the Journey from Street to Home, Jan. – May 2016 (Nov. 2017), *available at* <https://www1.nyc.gov/assets/servicedesign/downloads/pdf/NYC-Home-Stat_Insights_Report-2017> (hereinafter NYC HOME-STAT, Documenting the Journey from Street to Home). [↑](#footnote-ref-18)
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20. Health Care for the Homeless Clinicians’ Network, Adapting Your Practice: General Recommendations for the Care of Homeless Patients, 2010 Edition, *available at* <https://nhchc.org/wp-content/uploads/2019/08/GenRecsHomeless2010.pdf>. [↑](#footnote-ref-20)
21. NYC HOME-STAT, Documenting the Journey from Street to Home, *supra* note **Error! Bookmark not defined.**. [↑](#footnote-ref-21)
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26. Turning the Tide, *supra* note **Error! Bookmark not defined.**. [↑](#footnote-ref-26)
27. The National Resource Center on Homelessness and Mental Illness, Developing and Operating Safe Havens, *available at* <https://files.hudexchange.info/resources/documents/SafeHavens.pdf>. [↑](#footnote-ref-27)
28. Data provided by the Mayor’s Office, email correspondence on Dec. 6, 2019. [↑](#footnote-ref-28)
29. DHS Daily Report, Jan. 7, 2020, *available at* <https://www1.nyc.gov/assets/dhs/downloads/pdf/dailyreport.pdf> [↑](#footnote-ref-29)
30. The City of New York, Mayor Bill de Blasio, The Journey Home: An Action Plan to End Long-Term Street Homelessness, (2019), *available at* <https://newyork.cbslocal.com/wp-content/uploads/sites/14578484/2019/12/The-Journey-Home-2019_print_final.pdf> (hereinafter 2019 The Journey Home). [↑](#footnote-ref-30)
31. See CPL Art. 110-150 [↑](#footnote-ref-31)
32. CPL §§140.10-140.15 [↑](#footnote-ref-32)
33. Officers may also briefly detain individuals whom they reasonably suspect of criminal activity but do not have probable cause to arrest. Known as a *Terry*-stop, or Stop Question and Frisk, this practice requires particularized suspicion based on the individual’s conduct as it relates to potential criminal activity. [↑](#footnote-ref-33)
34. CPL §§150.10-150.20 [↑](#footnote-ref-34)
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36. Mental Hygiene Law §9.41 [↑](#footnote-ref-36)
37. Mental Hygiene Law §9.37 [↑](#footnote-ref-37)
38. 21 NYCRR Chapter XXI, §1050.10 [↑](#footnote-ref-38)
39. Public Authorities Law §1204 (5-a) [↑](#footnote-ref-39)
40. The Official Website of the New York City Council “The Criminal Justice Reform Act: One Year Later” June 2017 *available at* <https://council.nyc.gov/the-criminal-justice-reform-act-one-year-later/> [↑](#footnote-ref-40)
41. *Id.*  [↑](#footnote-ref-41)
42. Individuals can receive a criminal summons if they a) have an open warrant, b) individual has three or more unanswered civil summonses in the last 8 years, c) the individual has two or more felony arrests in the past two years d) the individual is on parole or probation e) the issuing officer articulating a legitimate law enforcement reason to issue a criminal summons f) the CJRA eligible summons is being co-issued with a summons for another charge that requires an appearance in criminal court [↑](#footnote-ref-42)
43. *Supra* note 1 [↑](#footnote-ref-43)
44. *Id.*  [↑](#footnote-ref-44)
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49. *Id.* [↑](#footnote-ref-49)
50. ‘Smoke and Mirrors’ *supra* note **Error! Bookmark not defined.** [↑](#footnote-ref-50)
51. Ahmed Jallow, “A Walk With Mayor de Blasio’s Street Homelessness Outreach Workers,” CityLimits, Jan. 2, 2020, <https://citylimits.org/2020/01/02/a-walk-with-mayor-de-blasios-street-homelessness-outreach-workers/> [↑](#footnote-ref-51)
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53. *Id.* [↑](#footnote-ref-53)
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57. Yoav Gonen, “de Blasio Turns Corner to Put Street Homeless on Fast Track to Homes,” The City, Dec. 17, 2019

<https://thecity.nyc/2019/12/de-blasio-turns-corner-to-move-street-homeless-into-homes.html> [↑](#footnote-ref-57)