



## HOMELESS SERVICES UNITED

307 W. 38TH STREET, 3RD FLOOR  
NEW YORK, NY 10018  
T 212-367-1589  
www.HSUnited.org

### Homeless Services United's Written Testimony submitted to the NYC Council Committees on General Welfare and Civil and Human Rights Joint Hearing on September 15<sup>th</sup> 2020

My name is Eric Lee and I'm the director of policy and planning at Homeless Services United. Homeless Services United (HSU) is a coalition representing mission-driven, homeless service providers in New York City. HSU advocates for expansion of affordable housing and prevention services and for immediate access to safe, decent, emergency and transitional housing, outreach and drop-in services for homeless New Yorkers. Thank you Chair Levin and Chair Eugene and members of both committees for holding this hearing and allowing us to testify today.

As New York City braces for the ending of the eviction moratorium and thousands of New Yorkers fall behind in their rent and edge closer towards housing instability, we must do everything possible to enable households to be able to access housing vouchers in a timely and consistent manner to ensure that they do not fall through the cracks trying to get assistance which they are entitled to. Every housing court case is a ticking clock, and just like legal counsel, assistance is only effective if it's rendered quickly enough to resolve the crisis. We thank the General Welfare and Civil and Human Rights Committee members for their leadership and foresight to address challenges that households face in attaining and preserving their homes.

#### **Raise Housing vouchers rent levels to keep up with fair market values**

**Homeless Services United strongly supports Int. 146-2018, which would implement annual increases for City housing voucher rent levels, in accordance with HPD's Fair Market Rent Levels.** The root causes of homelessness are lack of affordable housing and inadequate wages. As New York and its residents grapple with record unemployment and partial or total loss of household income, voucher eligibility must not be overly proscriptive for those that need assistance, and rent levels must align with enough of the housing market to be an effective resource. Pre-COVID, families and individuals with CityFHEPS and FHEPS "shopping letters" were often unable to find apartments in a timely manner given the voucher amounts are set below Fair Market Rent (FMR). Households sat in shelter upwards of a year searching for an apartment cheap enough to use the voucher. Even though apartment vacancies have increased in recent months, affordable apartments are always in high demand. Voucher holders will continue to be hard-pressed to locate a viable apartment, as they compete with stably housed New Yorkers looking to downsize to more affordable apartments during the economic downturn.

HomeBase providers are already seeing households that never would have needed their services before-tenants with previously higher incomes living in higher rent apartments who are now unable to make rent. Unable to qualify for a voucher if their apartment rents are too high, these tenants would lack future ability to pay, an HRA requirement for one-shot deals to pay arrears. Legal providers may be able to temporarily stay the eviction, but if the tenant cannot find a way make rent on their own, they will eventually be evicted. **If vouchers do not better reflect the true cost of housing in New York, not just the cheapest, many more households will be evicted in the coming months, and we will see a new wave of families entering shelter.**



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By raising CityFHEPS to Fair Market Rent, it will also help families and individuals currently residing in shelter to more quickly move back into permanent housing. The Single Adult shelter system continues to reach historic highs, with 17,841 individuals as of Sept 10<sup>th</sup>. 2020<sup>1</sup>, and without ample and timely permanent housing options including robust vouchers, and reinvesting in new affordable housing and supportive housing projects, it will continue to grow.

### **Expand CityFHEPS eligibility to keep more individuals stably housed**

**We urge the Council to also consider expanding eligibility for CityFHEPS in the community to serve more individuals.** Under the current rules, a single adult must either be a veteran, receiving Adult Protective Services (APS), reside in a rent controlled apartment, referred by “qualifying program”, or have been in a DHS shelter previously. **Many individuals at risk of eviction who have never been homeless before do not qualify for a CityFHEPS voucher**, and to mandate that they fully destabilize their housing, enter shelter (or remain on the streets) and on DHS caseload for 90 days to become eligible for a voucher is overly prescriptive, especially given the current rent crisis. **Housing is healthcare and we must do everything we can to protect the health of all New Yorkers and ensure they receive vital assistance as quickly as possible.**

### **Track NYC Housing Vouchers to ensure program accessibility and stability**

**Homeless Services United also supports Int. 1020-2018**, as reporting of the FHEPS program voucher holders is critical to understanding to what degree families are able to access assistance and maintain it in a timely manner, and help identify bottlenecks and challenges to further improve the process and user experience.

With the City’s shift from in-person meetings at HRA Centers to virtual assistance through the ACCESSHRA application, there is no way for tenants to actively request a FHEPS application or indicate a problem with their on-going FHEPS voucher, such as the need for a modification or restoration. While the process on HRA’s “backend” to try to flag and identify appropriate situations, **without a way for tenants to proactively request this assistance from the City, it is unclear how many new households have gained FHEPS, and continue to maintain it.**

In order to ensure the data from this new report is as helpful as possible, **we recommend that all data should be parsed both by zip codes and by HRA Center catchment area.** Zip codes would help inform the work of HomeBase providers who track cases in the same way, and likewise, by tracking data respective to each HRA Center’s catchment, it would help the City to identify and address specific challenges and deficiencies specific to particular sites. In terms of reporting frequency, we recommend monthly, rather than quarterly reports, to better identify on-going challenges in a timelier manner.

Since Oct. 2019, when FHEPS applications were transitioned from CBOs to HRA Centers, the application process became split into 2 steps for a number of households. If a household only needs FHEPS, HRA Center could submit an application themselves. However, if there are major complications, including additional rental arrears above the FHEPS maximum, incorrect rent amounts, apartment needs repairs,

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<sup>1</sup> <https://www1.nyc.gov/assets/dhs/downloads/pdf/dailyreport.pdf>



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or landlord mediation, HRA would make a “but for” referral (the family would be FHEPS eligible *but for* these reasons) to HomeBase to resolve these issues before referring the family back to the Center to submit an application. The previous “paid” FHEPS CBOs reported that at least 85% of cases had at least 2 major complications, and 40% had at least 3.

In practice (prior to COVID-19), HomeBase providers saw families inappropriately referred by HRA for issues which HRA Centers should have addressed directly, such as FHEPS restorations (when a voucher “fell off” and needs to be re-added to a household’s case) and modifications (when there is a change in income levels, household composition, etc., which would change the client’s portion of the rent). **Every time someone in need is referred to another agency for assistance, there is another chance that they do not make it there and ultimately fall through the cracks.** And to refer someone inappropriately adds frustration to the client, wastes their time, and might convince them to give up.

**To try to discern how many families may not be getting the help that they need, we recommend tracking** in addition to the total number of active and new FHEPS cases by City, zip code, and HRA Center, **the number of new cases that were submitted by HRA *without* needing HomeBase assistance, and the number of HRA referrals to HomeBase to address FHEPS related concerns.**

To ensure that the Council has as full a picture of how New Yorkers are utilizing vouchers, we recommend the Council **broaden reporting requirements** for other city-subsidized rental assistance in **section 21-323 b. 2. to include not just rental assistance programs for homeless Individuals and Families, but to also at risk of homelessness and eviction, disaggregated by in-community versus from shelter or street.** Families unable to apply for FHEPS may eventually be approved for CityFHEPS, and having both in-community enrollment figures side by side may indicate to what degree this may be occurring.

**For Preconsidered T2020-6576**, requiring DSS to report the status of CityFHEPS applications and renewal requests for applicants and voucher holders, it is a good first step towards adding transparency, and **HSU would welcome the opportunity to assist Chair Levin in further identifying bottlenecks in the process and how to help solve for them.**

### **Protect rights and services to help vulnerable populations attain housing**

HSU also supports efforts to ensure fair housing laws and principals are upheld and that all persons seeking housing are aware of their rights. We welcome the chance to continue to work with the Council on achieving these goals. We also support homeless families and individuals having meaningful access to domestic violence services. While we don’t believe all DHS shelter programs can specialize in this work, our colleagues in the domestic violence services community offer excellent programs to which DHS clients have access. We support efforts to ensure that any individual in need of domestic violence support services knows how to access it and are eager to partner with the our DV Coalition colleagues, the NYC Council, HRA, ENDGBDV and DHS on implementing suggestions on process improvements to achieve this that were surfaced during meetings of the Domestic Violence Taskforce’s Subcommittee on Housing and Economic Justice which our executive director co-chaired.



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Thank you to Chair Levin and Chair Eugene and members of General Welfare and Civil and Human Rights Committees for your leadership and recognizing the immediate need to strengthen housing equity and access within New York City. As the economic downturn continues to be felt across the City with widespread evictions continuing to loom, we must do everything possible to stabilize housing. Through timely provision of coordinated services between government and community based partners, and the robust rental assistance programs to help families and individuals who can no longer afford rent, we can avert a new homelessness crisis. Thank you for the opportunity to testify.