Committee on General Welfare

Aminta Kilawan, *Senior Legislative Counsel*

Crystal Pond, *Senior Policy Analyst*

Natalie Omary, *Policy Analyst*

Frank Sarno, *Finance Analyst*



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

**BRIEFING PAPER OF THE HUMAN SERVICES DIVISION**

**Jeffrey Baker, Legislative Director**

**Andrea Vazquez, Deputy Director, Human Services**

**COMMITTEE ON GENERAL WELFARE**

**Hon. Stephen Levin, Chair**

**October 29, 2020**

**INTRODUCTION NO. 1339-A:** By Council Members Ayala, Gibson, Lander, Richards, the Public Advocate (Mr. Williams), Chin, Powers, Reynoso, Cornegy, Rivera, Rosenthal, Kallos, Adams, Rose and Menchaca

**TITLE:** A Local Law to amend the administrative code of the city of New York, in relation to providing information about lawful source of income discrimination to applicants for the city fighting homelessness and eviction prevention supplement program

**ADMINISTRATIVE CODE:** Adds a new section 21-141.1 to the Administrative Code

**INTRODUCTION NO. 2080-A:** By Council Members Levin, Kallos, Adams, Yeger, Rosenthal, Chin, Menchaca and Ayala

**TITLE:** A Local Law to amend the administrative code of the city of New York, in relation to online access to rental assistance program application status

**ADMINISTRATIVE CODE:** Adds a new section 21-144 to the Administrative Code

1. **Introduction**

 On October 29, 2020, the Committee on General Welfare, chaired by Council Member Stephen Levin, held a hearing on Proposed Int. No. 1339-A, sponsored by Council Members Ayala and Gibson and Proposed Int. No. 2080-A, sponsored by Council Member Levin. The Committee previously held a hearing on September 15, 2020, jointly with the Committee on Civil and Human Rights, chaired by Council Member Mathieu Eugene, on the City’s rental assistance program and source of income discrimination as well as legislation including Int. 1339, and Int. 2080. At the hearing, those who testified included representatives from the New York City Department of Social Services (DSS), the New York City Commission on Human Rights (CCHR), shelter providers, advocacy organizations, community organizations, and members of the public. At the vote on October 29, 2020, the Committee voted 8 in favor, 0 opposed and 0 abstentions on Proposed Int. 1339-A and Proposed Int. 2080-A.

1. **BACKGROUND[[1]](#footnote-1)**

***CityFHEPS***

In 2004, the Bloomberg Administration introduced a City-funded, time-limited rental subsidy program for individuals and families in the Department of Homeless Services (DHS), called Housing Stability Plus.[[2]](#footnote-2) Housing Stability Plus was a five-year rental subsidy that gradually declined in assistance and included work requirements.[[3]](#footnote-3) Citing that Housing Stability Plus was ineffective due to opaque rules, low subsidies, and lack of access to stable housing, the Bloomberg Administration replaced the program in 2007 with Advantage, a two-year subsidy.[[4]](#footnote-4) The Advantage program initially offered subsidies for people in shelters if they worked 20 hours a week or more and then was expanded to incorporate additional populations.[[5]](#footnote-5) In 2011, the State pulled funding for Advantage, which covered two-thirds of the total cost, and the City subsequently cut the remaining third of the funding.[[6]](#footnote-6) About 8,500 families ended up returning to DHS shelters in the years after the program’s end.[[7]](#footnote-7)

In 2014 and 2015, the de Blasio Administration re-instituted City rental assistance vouchers for homeless households and those at risk of homelessness, including Living in Communities (LINC);[[8]](#footnote-8) City Family Eviction Prevention Supplement and City Family Exit Plan Supplement (CityFEPS) programs;[[9]](#footnote-9) and Special Exit and Prevention Supplement (SEPS)[[10]](#footnote-10) for single adults and adult families.

Having numerous programs with unique criteria confused both landlords and tenants, further exacerbating landlords’ hesitancy to accept City rental subsidies, which had already been compromised with the abrupt end of Advantage.[[11]](#footnote-11) On October 29, 2018, the de Blasio Administration consolidated the LINC, SEPS, and CityFEPS rental assistance programs into the City Fighting Homelessness and Eviction Prevention Supplement (CityFHEPS) program.[[12]](#footnote-12) The consolidation aimed to streamline services for tenants and landlords.[[13]](#footnote-13) CityFHEPS assists households in the community who are at risk of homelessness or are referred by the Administration for Children’s Services (ACS), the Three Quarter Housing (TQH) Task Force, the Department of Youth and Community Development (DYCD), or the Department of Correction (DOC) to avert Human Resources Administration (HRA) or DHS shelter entry.[[14]](#footnote-14) It also helps households who are experiencing street homelessness or residing in a DHS or HRA shelter to obtain permanent housing.[[15]](#footnote-15) All households must meet an income limit—income no greater than 200% of the federal poverty level—and satisfy public assistance requirements.[[16]](#footnote-16) In addition, there are separate eligibility criteria for households at risk of entry to, and currently in, HRA and DHS shelters or experiencing street homelessness.[[17]](#footnote-17) A household that is at risk of entry to an HRA or DHS shelter must be in one of the following groups to qualify for a CityFHEPS voucher to avert shelter entry:

1. Determined by DSS to be at risk of homelessness and include a veteran;
2. Be referred by a CityFHEPS qualifying program—ACS, TQH Task Force, DYCD, or DOC—and DSS determined CityFHEPS was needed to avoid shelter entry; or
3. Be displaced by eviction, foreclosure, or hazardous conditions within the last 12 months and:
	1. Previously was in a DHS shelter;
	2. Has an active Adult Protective Services case or is in a designated community guardianship program;[[18]](#footnote-18) or
	3. Will use CityFHEPS to stay in a rent-controlled apartment.[[19]](#footnote-19)

A household may qualify for a CityFHEPS voucher if the head of household is experiencing street homelessness or resides in a DHS shelter identified for imminent closure.[[20]](#footnote-20) An individual who is experiencing street homelessness must be living on the street or in a place not meant for human habitation.[[21]](#footnote-21) The individual also must have received case management services for at least 90 days from a DHS-contracted outreach provider, a DHS-contracted drop-in center, or transitional housing provider. [[22]](#footnote-22)

A household in a DHS or HRA shelter may also qualify for CityFHEPS if it belongs to either of the following two groups:

1. First, the household must have a qualifying shelter stay, consisting of being: (i) in a DHS shelter for the last 90 days prior to certification with a gap of no more than 10 days; (ii) in a DHS single adult shelter for 90 of the last 365 days; (iii) in an HRA shelter; or (iv) in a DHS shelter and eligible for HRA shelter. Second, the household must: (i) include an individual under age 18 and the combined household has been working 30 hours per week for the last 30 days; (ii) be an adult only household working any number of hours per week for the last 30 days; (iii) include someone who is age 60 or older; or (iv) include someone who is age 18 or older who is either disabled or is exempt from public assistance work requirements due to caring for a family member with a disability.[[23]](#footnote-23)
2. The household is in a DHS or HRA shelter and either: (i) includes a veteran; (ii) has an unexpired LINC certification letter or a SEPS or CITYFEPS shopping letter and would still be eligible for assistance; or (iii) has been referred by ACS, DYCD, the TQH Task Force, or DOC, and DSS determined that CityFHEPS was needed to shorten a shelter stay.[[24]](#footnote-24)

Furthermore, a household may be eligible for a CityFHEPS rental assistance voucher to prevent entry into a City shelter.[[25]](#footnote-25) HRA accepts referrals for CityFHEPS from ACS, DOC, and the TQH Task Force to help those exiting foster care and City jails and those living in three-quarter houses avert shelter entry.[[26]](#footnote-26)

The CityFHEPS rental assistance voucher is a critical tool in helping individuals and families avoid and exit shelter. However, many advocates and homeless shelter providers argue its maximum rent limits are too low and are not tied to the Fair Market Rent (FMR), in contrast to the country’s most successful rental assistance voucher, Section 8.[[27]](#footnote-27) The maximum rent allowed under CityFHEPS for a three- or four-person household, for example, is $1,580 per month,[[28]](#footnote-28) much below the fiscal year 2020 FMR for a two-bedroom apartment in New York City ($1,951 per month).[[29]](#footnote-29) This lower rent limits the supply of affordable apartments available to a voucher holder.

According to an analysis by homeless services provider Women in Need (WIN), raising the monthly voucher limit from $1,580 to $1,951, for example, would open up about 68,000 two-bedroom recently-available apartments.[[30]](#footnote-30) Opening up the universe of apartments that are potentially voucher-eligible means more opportunities to permanently house individuals and families, which could also reduce the length of homelessness or being at risk of homelessness.

On the State level, Senator Liz Krueger and Assembly Member Andrew Hevesi have introduced the Home Stability Support (HSS) program (S.2375/A.1620), a statewide rent supplement for families and individuals who are eligible for public assistance benefits and facing eviction, homelessness, or loss of housing due to domestic violence or hazardous living conditions.[[31]](#footnote-31) HSS would establish a rent supplement that would replace existing supports such as CityFHEPS and would represent 85% of FMR, with the City having the option to make up the difference so the supplement would reflect 100% of the FMR.[[32]](#footnote-32) The City Comptroller has estimated that over a 10-year period, HSS could reduce the City shelter population by 80% for families with children, 60% for adult families, and 40% for single adults.[[33]](#footnote-33) Despite the significant support in the (125 Assembly Members and 35 Senators have signed on as co-sponsors) HSS has not advanced in either house of the state legislature.[[34]](#footnote-34)

According to the Center on Budget and Policy Priorities, one rigorous study following voucher recipients found that housing vouchers can lead to future savings.[[35]](#footnote-35) Vouchers provided to homeless families with children reduce other shelter costs enough to offset nearly the entire cost of the voucher.[[36]](#footnote-36) Rental assistance combined with supportive services for homeless individuals with serious health problems can achieve savings in the health care, corrections, and emergency shelter systems, which may be close to or above the cost of the rental assistance and services.[[37]](#footnote-37)
***Source of Income Discrimination***

In response to reports about discrimination against Section 8 voucher holders, in 2008, the Council enacted a local law adding “lawful source of income” to the New York City Human Rights Law (NYCHRL) as a protected class for prospective tenants, making it illegal to refuse to rent an apartment because someone has a housing assistance voucher.[[38]](#footnote-38) The law prohibits landlords or real estate brokers with a building of six or more units to refuse to rent to current or prospective tenants who use any form of government assistance to pay their rent.[[39]](#footnote-39) It also makes it unlawful for landlords and housing agents to publish any type of advertisements, including online or print, that indicate a refusal to accept these programs.[[40]](#footnote-40) Two City agencies enforce the source of income (SOI) discrimination law: the HRA SOI Unit and the City Commission on Human Rights (CCHR). Both entities conduct education and outreach, and bring enforcement actions on behalf of renters.[[41]](#footnote-41)

The HRA Source of Income Discrimination Unit was created in 2017 and works to prevent and prosecute instances of housing discrimination based on lawful source of income via a multi-pronged approach that includes education and outreach, pre-complaint intervention, investigations, and filing and prosecuting complaints on behalf of the City alleging a pattern or practice of source of income discrimination.[[42]](#footnote-42) In its first full calendar year of operation, the HRA SOI unit received 511 queries through HRA’s InfoLine, including calls from 311.[[43]](#footnote-43) Of those 511 queries, 267 reported discriminatory conduct, but 89 of those reports involved brokers and landlords who were not subject to SOI because the building had less than six units.[[44]](#footnote-44) HRA intervened in many cases to reverse landlord, management companies and co-op board refusals to accept vouchers.[[45]](#footnote-45) HRA has also produced a renter’s guide that discusses SOI rights and trained 3,000 city workers about source of income discrimination.[[46]](#footnote-46)

While the HRA SOI unit makes all efforts to resolve reports of discrimination without the need for litigation, lawsuits have been filed against those not abiding by the NYCHRL. Unlike the CCHR, which is able to pursue actions on behalf of individuals, the HRA SOI Unit only files pattern and practice cases on behalf of the City.[[47]](#footnote-47) In 2018, the Unit filed its first two cases in New York State Supreme Court against landlords who did not accept vouchers.[[48]](#footnote-48) In the first case, *City of New York v. St. Marks Hamilton LLC and Oxford Realty Group LLC*,[[49]](#footnote-49) property management company Oxford Realty told multiple callers seeking housing that vouchers were not accepted at the Seaview Estates rental apartment complex in Staten Island.[[50]](#footnote-50) In the second case, *City of New York v. Everton Campbell, Atlas Realty Associates, Inc.*, DSS initiated an investigation that found advertisements containing discriminatory language for units located in the Bronx being published on multiple real estate websites.[[51]](#footnote-51) In the press release announcing the lawsuits, DSS Commissioner Steve Banks stated, “To any landlord that refuses to rent to New Yorkers receiving public assistance to pay their rent: consider yourselves officially on notice.”[[52]](#footnote-52)

CCHR has handled SOI discrimination complaints since SOI discrimination was outlawed in New York City in 2008. Since then, they have formed a unit specifically tasked with the handling of such complaints.[[53]](#footnote-53) CCHR’s SOI discrimination unit investigates and, if applicable, prosecutes real estate brokers and landlords in New York City who refuse to rent to tenants based on their lawful source of income. According to CCHR, the unit investigated and resolved over 350 cases of SOI discrimination in 2018 and 2019.[[54]](#footnote-54) CCHR’s SOI discrimination unit filed 176 cases of source of income-based discrimination against landlords and brokers in New York City.[[55]](#footnote-55) In addition to receiving complaints, the Commission also uses a method called matched pair testing, where two identical potential tenants apply for the same housing, the only difference between them being that one applicant is using some form of lawful rental assistance in order to pay rent. This is meant to identify discriminatory landlords and brokers. The unit also conducts outreach and education to combat SOI discrimination. Despite increased multilingual educational outreach efforts and campaigns from both CCHR and DSS, there remains a lack of knowledge among those facing SOI discrimination regarding their rights and the available resources to combat such discrimination.[[56]](#footnote-56)

Despite a prohibition against SOI discrimination, it continues to exist as a barrier to permanent housing.[[57]](#footnote-57) In 2019, after consistent organizing efforts from stakeholders and advocates, the State took action to ban SOI discrimination statewide by amending the State Human Rights Law. As opposed to the City SOI law, the State SOI law covers all buildings and units, except for: rental units in two-family homes occupied by the owner; rentals in rooming houses occupied by the owner; rental of all rooms to persons of the same sex; and certain senior housing.[[58]](#footnote-58) The NYCHRL is thus more limited in scope, because it does not cover properties with fewer than six units.

The de Blasio Administration has attempted to encourage the real estate community to accept rental assistance vouchers through administrative changes and financial incentives. Brokers can earn a commission equivalent to 15% of the annual rent and landlords can receive a $3,500 bonus for renting an apartment to a voucher recipient and one month’s rent from the City to hold an apartment while the City conducts inspections to ensure the housing complies with regulations.[[59]](#footnote-59) However, given the prevalence of SOI discrimination reports, there is concern that dialogue around this issue needs to be more frequent and expansive.

***Effects of COVID on Housing Insecurity***

The economic fallout from the Coronavirus pandemic has further strained an already precarious situation for middle- and low-income renters across the United States. Approximately 23% of households in New York State reported that eviction or foreclosure in the next two months was very likely or somewhat likely.[[60]](#footnote-60) In addition, over 700,000 people in the state reported being behind on payments or had little to no confidence that they would be able to make the next one.[[61]](#footnote-61) Between 19 and 23 million Americans are estimated to be at risk of eviction by September 30, 2020, with undocumented people, low-income people, and people of color being the most vulnerable.[[62]](#footnote-62) The Aspen Institute estimated as many as 1.5 million New Yorkers could be at risk of eviction by fall 2020.[[63]](#footnote-63) On March 20, 2020, New York State put a 90-day eviction moratorium in place, protecting housing for hundreds of thousands of New Yorkers.[[64]](#footnote-64) On May 7, 2020, Governor Andrew Cuomo extended the moratorium on evictions to August 20, 2020, and subsequently the New York State Housing Court System announced that residential eviction cases will not be carried out until October 1st.[[65]](#footnote-65) The federal government has issued a rule suspending evictions through December 31, 2020, with a five-pronged test for eligibility including an income cap and substantial loss of income.[[66]](#footnote-66) The agency order from the Centers for Disease Control (CDC) expresses the importance of housing stability in ensuring public health especially during a crisis such as this one due to the higher risk that those experiencing homelessness face in congregate settings and shelters.[[67]](#footnote-67) Nationwide data from the U.S. Census Household Pulse Survey for July 2020 shows that more than 40% of Black and Latinx households had no or only slight confidence they could pay their rent next month compared to 21% of White renters, demonstrating how the pandemic is widening the existing disparities in housing security.[[68]](#footnote-68)

1. **Bill Analysis**

**Int. 1339-A** – A Local Law to amend the administrative code of the city of New York, in relation to providing information about lawful source of income discrimination to applicants for the city fighting homelessness and eviction prevention supplement program

This bill would require the New York City Department of Social Services (DSS) to arrange for the provision of a written notice to CityFHEPS rental assistance program applicants with administration about source of income discrimination at the time an applicant receives a shopping letter from DSS. The notice would provide information about protections under the New York City Human Rights Law related to discrimination on the basis of a person’s lawful source of income. Since introduction, the bill has been amended to require that it would take effect 180 days after it becomes law.

**Int. 2080-A** – A Local Law to amend the administrative code of the city of New York, in relation to online access to rental assistance program application status

This bill would require the Department of Social Services (DSS) to provide more information about its rental assistance program, CityFHEPS, online. Specifically, DSS would be required make the status of an application or renewal request available to applicants and to non-profit providers online.

Since introduction, the bill has been amended to require that DSS execute a contract to make online access available by June 30, 2021. If passed, this bill would take effect immediately.

Int. No. 1339-A

By Council Members Ayala, Gibson, Lander, Richards, the Public Advocate (Mr. Williams), Chin, Powers, Reynoso, Cornegy, Rivera, Rosenthal, Kallos, Adams, Rose and Menchaca

A LOCAL LAW..Title

To amend the administrative code of the city of New York, in relation to providing information about lawful source of income discrimination to applicants for the city fighting homelessness and eviction prevention supplement program

..Body

Be it enacted by the Council as follows:

Section 1. Chapter 1 of title 21 of the administrative code of the city of New York is amended by adding a new section 21-141.1 to read as follows:

§ 21-141.1 Information regarding lawful source of income discrimination. a. Definitions. For purposes of this section, the following terms have the following meanings:

CityFHEPS. The term “CityFHEPS” means the city fighting homelessness and eviction prevention supplement program established pursuant to chapter 10 of title 68 of the rules of the city of New York or any successor program.

Covered entity. The term “covered entity” means the owner, lessor, lessee, sublessee, assignee, or managing agent of, or other person having the right to sell, rent or lease or approve the sale, rental or lease of a housing accommodation, constructed or to be constructed, or an interest therein, or any agent or employee thereof, who is subject to the prohibition on discrimination based on lawful source of discrimination pursuant to subdivision 5 of section 8-107.

Lawful source of income. The term “lawful source of income” has the meaning as set forth in section 8-102.

 Shopping letter. The term “shopping letter” means a letter issued by the department to assist a household in its housing search that identifies the household as potentially eligible for CityFHEPS and lists the maximum rent.

b. The department shall provide written notice regarding the protections of section 8-107 related to lawful source of income at the time that a CityFHEPS applicant receives a shopping letter. Such notice shall be developed by the New York city commission on human rights pursuant to paragraph p of subdivision 5 of section 8-107 in consultation with the department.

§ 2. Subdivision 5 of section 8-107 of the administrative code of the city of New York is amended by adding a new paragraph (p) to read as follows:

(p) For purposes of this paragraph, the term “CityFHEPS” means the city fighting homelessness and eviction prevention supplement program established pursuant to chapter 10 of title 68 of the rules of the city of New York or any successor program. The commission shall develop and disseminate a written notice of protections of this subdivision related to lawful source of income. The notice shall be made available to the department of social services for use in accordance with section 21-141.1. The notice shall include, at a minimum, the following information:

 1. Examples of different forms of lawful source of income;

 2. A description of covered entities required not to discriminate on the basis of lawful sources of income;

 3. Examples of actions that may indicate discrimination based on lawful source of income in violation of title 8, such as refusing to accept lawful source of income for rent payment, publishing any type of advertisement that indicates a refusal to accept any lawful source of income, and refusing or delaying repairs because a person uses any lawful source of income for rent payment, publishing any type of advertisement that indicates a refusal to accept any lawful source of income, and any additional actions landlords or brokers use to unlawfully discriminate against a person on the basis of their using any lawful source of income;

4. A statement that it is illegal for covered entities to refuse to accept a CityFHEPS subsidy for payment of rent or a security deposit voucher in buildings subject to the prohibition on discrimination on the basis of lawful source of income pursuant to section 8-107;

5. A statement that it is illegal for covered entities to request additional payments for rent, a security deposit or broker’s fee because an individual receives rental assistance;

 6. A statement that it is illegal for covered entities to publish any type of advertisement that indicates a refusal to accept rental assistance;

 7. A statement that it is illegal for landlords to refuse or delay making repairs to an individual’s unit because such individual pays rent with a CityFHEPS subsidy;

 8. A statement that an individual has the right to be free from discriminatory, harassing or threatening behavior or comments based on such individual’s receipt of or application for CityFHEPS;

9. Directions on how to contact the commission, the department of social services’ source of income discrimination unit, the state division of human rights and the office of the state attorney general;

10. A description of potential remedies available at the commission if a covered entity is found to have engaged in discrimination based on lawful source of income; and

11. Any other information deemed appropriate by the commissioner and the commission in consultation with the department of social services.

§ 3. This local law takes effect 180 days after it becomes law.

MHL/ACK

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Int. No. 2080-A

By Council Members Levin, Kallos, Adams, Yeger, Rosenthal, Chin, Menchaca and Ayala

A LOCAL LAW

..Title

To amend the administrative code of the city of New York, in relation to online access to rental assistance program application status

..Body

Be it enacted by the Council as follows:

Section 1. Chapter 1 of title 21 of the administrative code of the city of New York is amended by adding a new section 21-144 to read as follows:

§ 21-144 Online access to rental assistance application status. a. Definitions. For purposes of this section, the following terms have the following meanings.

Provider. The term “provider” means a community-based organization under contract or similar agreement with the department or the department of homeless services for assisting an individual with their rental assistance application or renewal request.

Rental assistance. The term "rental assistance" means financial assistance provided by the department for the purpose of paying a recipient's rent on an ongoing basis and includes but is not limited to the public assistance shelter allowance provided by the department as established by section 131-a of the social services law, section 159 of the social services law, section 349 of the social services law, or any codes, rules and regulations, as well as subsidies provided through the rental assistance program established in chapters 9 and 10 of title 68 of the rules of the city of New York, and any successor program to the foregoing programs.

b. Online access. No later than June 30, 2021, the commissioner or his or her designee shall execute a contract that will provide for the status of a rental assistance application or renewal request to be made available online to the applicant or provider. Such status shall include specific information on where in the process of the rental assistance request an application is, and whether and when any rental assistance payments have been issued.

§ 2. This local law takes effect immediately.

SG/ACK

LS #8043

10/21/2020 10:47pm

1. Portions of this Committee Report are from the NYC Council’s Report “Our Homelessness Crisis:
The Case for Change.” For full report *see*  <https://council.nyc.gov/data/homeless/>. [↑](#footnote-ref-1)
2. Coalition for the Homeless, The Bloomberg Administration’s Flawed Homeless Rental Assistance Plan: A Misguided Plan with Opportunities for Effective Change, (Nov. 2004), available at

<https://www.coalitionforthehomeless.org/wp-content/uploads/2014/06/Briefing-cityrentplan-11-2004.pdf>. [↑](#footnote-ref-2)
3. *Id.* [↑](#footnote-ref-3)
4. Joe Lamport, A New Program to Fight Homelessness, The Gotham Gazette, (May 30, 2007), available at https:// [www.gothamgazette.com/housing/3574-a-new-program-to-fight-homelessness](http://www.gothamgazette.com/housing/3574-a-new-program-to-fight-homelessness). [↑](#footnote-ref-4)
5. *Id.* [↑](#footnote-ref-5)
6. Peter Nasaw and Thomas J. Main, De Blasio and Homelessness: A New Progressive Mayor Wrestles with an Old Social Problem, The Gotham Gazette, (May 1, 2017), available at <http://www.gothamgazette.com/opinion/6902-deblasio-and-homelessness-a-new-progressive-mayor-wrestles-with-an-old-social-problem>. [↑](#footnote-ref-6)
7. Patrick Markee, The Revolving Door Keeps Spinning: New Data Shows that Half of “Advantage” Families Have Returned to the NYC Homeless Shelter System, Coalition for the Homeless, (Dec. 28, 2013), available at <https://www.coalitionforthehomeless.org/wp-content/uploads/2014/06/PolicyBrief-RevolvingDoorKeepsSpinning2013.pdf>. [↑](#footnote-ref-7)
8. R.C.N.Y. Title 68 Chapter 7 LINC Programs [↑](#footnote-ref-8)
9. R.C.N.Y. Title 68 Chapter 8 CITYFEPS Programs; SEPS Program [↑](#footnote-ref-9)
10. *Id.* [↑](#footnote-ref-10)
11. NYC Dept. of Homeless Services, Press Release, City Proposes Single Unified Rental Assistance Program to Streamline and Simplify Rehousing Process, (July 18, 2018), available at

<https://www1.nyc.gov/site/dhs/about/press-releases/unified-rental-assistance-press-release.page>. [↑](#footnote-ref-11)
12. Joe Anuta, Launch Date Set for Consolidated Rent-Voucher Program, Crain’s, (Oct. 2, 2018), available at <https://www.crainsnewyork.com/real-estate/launch-date-set-consolidated-rent-voucher-program>. [↑](#footnote-ref-12)
13. NYC Human Resources Administration, Rental Assistance, CityFHEPS, available at <https://www1.nyc.gov/site/hra/help/cityfheps.page>. [↑](#footnote-ref-13)
14. R.C.N.Y. Title 68 Chapter 10-03. [↑](#footnote-ref-14)
15. R.C.N.Y. Title 68 § 10-01 (e). [↑](#footnote-ref-15)
16. A household must meet the following requirements with respect to public assistance. The household must apply for any assistance, if it is currently not in receipt of such. In addition, all household members who are eligible for public assistance must be in receipt of it and in compliance with public assistance requirements; R.C.N.Y. Title 68 Chapter 10 City FHEPS [↑](#footnote-ref-16)
17. R.C.N.Y. Title 68 Chapter 10 City FHEPS [↑](#footnote-ref-17)
18. The Adult Protective Services program provides services for physically and/or mentally impaired adults ages 18 and older, and Community Guardian programs consist of court-appointed legal guardians who manage these adults’ domestic and financial affairs. NYC Human Resources Administration, Adult Protective Services, available at <https://www1.nyc.gov/site/hra/help/adult-protective-services.page>. [↑](#footnote-ref-18)
19. NYC Department of Social Services, CityFHEPS Frequently Asked Questions For Clients in the Community, (Sept. 18, 2019), available at <https://www1.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/dss-7r-e.pdf>. [↑](#footnote-ref-19)
20. R.C.N.Y. Title 68 § 10-04(a)(8). [↑](#footnote-ref-20)
21. R.C.N.Y. Title 68 § 10-01(mm). [↑](#footnote-ref-21)
22. *Id.* [↑](#footnote-ref-22)
23. NYC Department of Social Services, CityFHEPS Frequently Asked Questions For Clients in the Community, (Sept. 18, 2019), available at <https://www1.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/dss-7r-e.pdf>. [↑](#footnote-ref-23)
24. R.C.N.Y. Title 68 § 10-04 [↑](#footnote-ref-24)
25. NYC Department of Social Services, CityFHEPS Frequently Asked Questions For Clients in the Community, (Sept. 18, 2019), available at <https://www1.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/dss-7r-e.pdf>. [↑](#footnote-ref-25)
26. R.C.N.Y. Title 68 § 10-01(e). [↑](#footnote-ref-26)
27. Supportive Housing Network of NY, HUD Section 8 Tenant-Based (a.k.a Housing Choice Vouchers), available at <https://shnny.org/fundingguide/section-8-tenant-based-a.k.a.-housing-choice-vouchers/> (last visited Jan. 10, 2020). [↑](#footnote-ref-27)
28. Meeting with stakeholder on Dec. 26, 2019. [↑](#footnote-ref-28)
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