



August 21, 2018

RE: Comments on proposed rule amendments to establish **CityFHEPS**

Win commends the Administration for taking action to reform flaws in New York City's rental assistance programs that jeopardized the housing stability of formerly homeless families and children. Since 2016, Win has advocated for the removal of time limits on LINC rental assistance for families in need, as well as for instituting annual increases in assistance to respond to the natural increase in rent. By replacing the City's existing rental assistance programs with one, new program- CityFHEPS- that does not discontinue rental assistance to families in need on the basis of arbitrary time limits and that provides for annual increases indexed to those set forth by the Rent Guidelines Board, the Human Resources Administration has taken an important step toward preventing homelessness for thousands of New York City families and children.

Win also applauds the Administration for extending CityFHEPS eligibility to include New Yorkers at a high risk for homelessness. Win has advocated for reforms to LINC that would allow young families aging out of foster care to access rental assistance without requiring them to spend time in homeless shelter. CityFHEPS provisions will allow just that, so that young families can avoid homelessness and still access needed assistance.

Notwithstanding this important progress, one flaw persists: the rental assistance amount remains too low. Win frontline staff have identified this as the biggest barrier families face in using their rental assistance to find an appropriate apartment that would allow them to move out of shelter. Win urges the Administration to establish City FHEPS at an assistance amount that reflects the reality of housing costs in New York City. Unless the assistance amount is increased, the program will not enable homeless families to compete in the real estate market.

Win is committed to continued collaboration with the Administration and City agencies to advance a rental assistance program that supports the housing stability of our lowest-income families and provides homeless families a needed tool for achieving permanent housing.

About Win

Since its founding in 1983 to provide shelter for two homeless women and their children, Win has grown into a city wide model serving homeless families with children. On any given night, nearly 2,700 families with more than 5,000 children go to bed in a Win homeless shelter or supportive housing site. Win currently operates ten Tier II shelters located throughout four boroughs and supportive housing in Manhattan, Brooklyn, and the Bronx. All Win sites and services hold to its mission to transform the lives of NYC homeless families with children by providing safe housing, critical services, and the ground-breaking programs families need to succeed— so families can regain their independence and their children can look forward to a brighter future.