



Breaking the Cycle of Homelessness
for Women and their Children

**Testimony of Women in Need (WIN) on Oversight: The CityFHEPS Rental Assistance Program
before the General Welfare Committee of the New York City Council
January 18th, 2023**

Good afternoon, Chair Ayala, and members of the General Welfare Committee. My name is Dr. Henry Love, and I am the Vice President of Policy and Planning at Win Inc. Currently, Win is the nation's largest provider of shelter and services to families with children experiencing homelessness. We operate 14 shelters and nearly 600 supportive housing units across the five boroughs. Currently, more than 6,600 people call Win "home" every night, including 3,600 children — in total, we house over 14 percent of homeless families with children in New York City. Thank you for the opportunity to testify today. I am here in support of the legislation and resolution being heard today to reform the CityFHEPS voucher program and to urge the City to act on a variety of administrative issues that are preventing eligible families from using the voucher to move out of shelter and into permanent housing. When vouchers are accessed and utilized, they have the potential to stabilize low-income households struggling to pay rent and to provide those in shelter with a path to permanent housing. In the last year, our trained program staff worked to move just over 840 families out of shelter and into permanent homes. Rental assistance programs like CityFHEPS have been key to this success, and we thank the City Council for their contributions in turning this voucher into an essential tool in preventing and ending homelessness. Responding to calls from families experiencing homelessness and organizations like Win, the City Council passed the groundbreaking Intro. No. 146, which increased the value of CityFHEPS vouchers and expanded access to thousands of apartments that were previously out of reach. In the five months after the voucher amounts increased, Win's CityFHEPS placements were 79 percent higher compared to the months immediately before, and 40 percent higher compared to the previous year. We are further encouraged by and in support of the pre-considered bills and resolution being heard today.

Foremost, we are delighted to support a bill that would end the 90-day rule, the arbitrary and antiquated criterion that families must reside in shelter for 90 days before becoming eligible to apply for a CityFHEPS rental assistance voucher. This legislation, being introduced by Chair Ayala, Councilmembers Sanchez, Bottcher, Won, Hanif, and Public Advocate Williams, can prevent families from experiencing unnecessary trauma associated with prolonged homelessness and save the City thousands of dollars a month.¹ *The current wait period imposed by the 90-day rule is costing the City more than \$10,500 per family.* This requirement is unduly imposing homelessness on families ready to move out, and the system is buckling under the strain. Across Win's family shelters, there is a 1 percent vacancy rate. Addressing this paternalistic rule is paramount as the City grapples with an ever-growing influx of immigrants, many of whom are wrongly ineligible for any form of rental assistance. With the growing migrant crisis, it is even more critical to pass this legislation and move CityFHEPS-eligible families out of the system.

It is also critical that all families in shelter have the resources they need to move out into homes of their own. Currently, most migrant families are blocked from using any rental

¹Ella Ceron, "NYC Mayor Urged to Abolish 90-Day Shelter Rule Amid Migrant Influx," *Bloomberg* November 20, 2022 <https://www.bloomberg.com/news/articles/2022-09-20/new-york-mayor-eric-adams-is-pressured-to-abolishhomeless-shelter-rule?leadSource=verify%20wall>



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assistance due to their immigration status. That is why we support the intent of the resolution from Councilmembers Sanchez and Hanif, which calls on the state legislature to enact legislation that would provide NYC with the authority to expand CityFHEPS to all New Yorkers, regardless of their immigration status. Migrant families and children, the majority of whom are under the age of 5, come to New York City to seek shelter and refuge after experiencing unthinkable hardships. In a recent survey and interview series we did with our migrant families, we heard stories of starvation, violence, and persecution. Unfortunately, these accounts resemble countless other stories, and people continue to flee their homes by the thousands to save their lives and find a better future for their children. While New York City shelters have welcomed more than 26,000 individuals from the most recent influx of migrants, we anticipate that even more will arrive in the coming year, and years following; as this has become our new normal. This is not accounting for the thousands of immigrant families who were already in shelters, unable to move out with rental assistance and becoming long-term stayers, sometimes remaining in shelter for over five years. Presently, these vulnerable families and children are ineligible for rental assistance vouchers, a denial that is exacerbating the capacity crisis and trapping migrant families in transitional housing shelters. Although we agree that the State can and must do more, we believe that the City has the authority to act unilaterally and should expand CityFHEPS eligibility to migrant families regardless of their immigration status.

To further counter the capacity crisis, the City should pass the bill under pre-consideration that would remove the employment requirement for CityFHEPS eligibility and change the income limit from 200 percent of the federal poverty line to 50 percent of Area Median Income (AMI). Work should not be a precondition for housing and eliminating this requirement will significantly expand the number of people in shelter eligible for vouchers, creating an exit path for more people and alleviating pressure on the system. Further, eliminating the work requirement will undoubtedly improve the experience of homeless parents, who have the added challenge of living in shelter and complying with the various rules and regulations imposed there, while balancing a job with other responsibilities such as childcare and education. Imposing an income limit on the program makes sense, but the current limit of 200 percent of the federal poverty line is too low. Changing the standard to 50 percent of AMI sets a more reasonable income standard in the extremely expensive New York City market. However, we would like to see the language amended slightly to “households earning up to 50 percent AMI shall be eligible for rental assistance” to ensure that income limits are not set lower than the 50 percent AMI point. Additionally, the bill under pre-consideration that would expand the criteria of CityFHEPS eligibility to include families at risk of becoming homeless would help keep families in their homes, preventing them from entering shelter in the first place. Becoming homeless is a trauma, and the City can and should save families that trauma by extending the assistance they need to stay in their homes permanently through CityFHEPS.

We thank City Council for proposing these reforms and hope to see all the legislation being heard swiftly passed. Nevertheless, there are other outstanding changes that must be made to make the voucher work better for New Yorkers experiencing homelessness. The Department of Social Services (DSS) has the power to eliminate persistent administrative problems with the housing process, making CityFHEPS an easier option for both potential tenants and landlords — and we urge it to do so. At Win, clients and staff frequently voice that administrative challenges are among the biggest roadblocks to utilizing rental assistance, even after the increase in the



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value of CityFHEPS. As such, based on the experiences of Win staff working to help families find housing and leave shelter, we have identified administrative roadblocks in the CityFHEPS process and are offering common-sense solutions here for DSS to implement.

At Win we are on the frontlines and understand that the CityFHEPS voucher is a complicated and work-intensive program to operate, but current delays can cause an eligible family to remain in shelter for many additional weeks, if not months. Therefore, we suggest widespread investment in the voucher program and additional modernization efforts. Win strongly encourages DSS to decrease its staff to review applications for CityFHEPS. Especially with the recently announced reforms and an expected increase in eligible families, DSS should hire additional employees and invest in its current rental assistance voucher teams. To improve communication and reduce redundancies, DSS should also assign each application to a single staff member, who is accountable for overseeing the application from start to finish. Currently, packages are reviewed by different DSS staff, which often leads to packages being flagged with a single error and returned. To avoid a lengthy back and forth, DSS should link each application to a single, accountable staff member and have them review the package in its entirety.

Additionally, throughout the entire process, there should be more transparency for tenants, landlords, and social services staff. DSS should create a client and provider-facing portal that clearly indicates where an application is in the process and allows applicants to upload missing or corrected documents in real time, rather than forcing them to start the approval process anew every time there is a small error or omission. For one family that worked with a Win Housing Coordinator, the apartment preclearance package was rejected because the landlord's name on the deed and on the lease did not match due to a typo. Therefore, the Housing Coordinator had to redo all the work she had done and resubmit the preclearance package, delaying the family's move out by about two weeks. "It may not seem like a lot of time," she told us, "But for a family living in shelter, and often times also dealing with mental health issues, it is." Additionally, these delays can cost the City an estimated \$1,628. Instead, a central online portal for shelter staff, clients, and landlords to submit documents could relieve this bureaucratic bottleneck. Perhaps, the ACCESS HRA website and free mobile app could host this online CityFHEPS portal. Currently, shelter staff who are assisting CityFHEPS applicants are often forced to file new paperwork and send multiple emails each time there is an issue with an application, but an online platform to resubmit this work and communicate with staff would lead to a faster voucher review process and a decreased workload all around. Finally, to ensure families and landlords have the support they need, the CityFHEPS customer service line should be expanded to assist both landlords and families with the voucher. As it now stands, landlords frequently become frustrated with the lack of ability to communicate with DSS about vouchers. Instead, setting up a phone line for landlords could improve confidence in the CityFHEPS program and deter source of income discrimination.

Within the rules and exemptions of CityFHEPS, Win also urges the Administration to eliminate the Utility Allowance Deduction and the Rent Reasonableness Standard. The policy of deducting the utility allowance from the overall CityFHEPS amount decreases the value of the subsidy, often leading applicants to narrowly miss out on apartments. In the current housing market, every dollar matters, which is why we are calling on DSS to stop requiring that a portion of CityFHEPS funds be used on utilities. Instead, Win believes the utility policy should be that tenants can rent units that cost the total voucher amount, regardless of whether utilities are



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included. This change would be akin to the Section 8 program rules and push the City closer to parity with this program. Likewise, with the Rent Reasonableness Standard, despite an apartment's rent being at or below a family's voucher amount, a family can still lose out on housing because the City does not believe the rent is "reasonable" compared to other equivalent apartments in the area. This policy creates a separate and confusing standard for rent amounts, which are often lower than the maximum rents allowed under the voucher. We are calling for the rent reasonableness requirement to be eliminated, as it causes significant and unnecessary harm to voucher holders by shrinking the pool of apartments available to them.

Once a CityFHEPS application passes review and a family is finally ready to move into their home with the voucher, further delays can occur because of the City's reliance on outdated systems for rental payments. Although DSS has indicated that it should take about seven days for rental assistance checks to be delivered to landlords, it often takes much longer. A major source of this delay is the requirement that payments must be made by physical checks, even though electronic transfer is a technology that landlords use regularly and have come to expect from tenants in 2023. We therefore urge the City Council to pass and enact Intro 704. The legislation, introduced by Councilmember Abreu, provides a commonsense solution to this problem by amending the City's administrative code to require that the Human Resources Administration (HRA) provide landlords the option to accept rental assistance payments via an electronic transfer. Without this change, the current paper check process causes extensive and unnecessary delays as well as logistical hardships for DSS and shelter providers whose staff are already stretched thin. For families at risk of being evicted and becoming homeless, these holdups can cost them their home and force them into shelter. For those already in shelter, families and children can be forced to stay in their shelter for weeks longer than necessary because of this archaic paper check payment process.

Finally, as the City seeks to modernize the CityFHEPS voucher and make the move-out process more efficient, we would like to see reform that ultimately reduces the CityFHEPS application turnaround time to a maximum of 30 days, including the preclearance, inspection, packet preparation, packet approval, and issuance of payments. As it stands, there is no set standard for how long it should take to complete an application from start to finish. Instead, the City should put in place the aforementioned recommendations and increase staffing to be able to adhere to a strict 30-day turnaround time.

Every additional day in shelter deprives a family of time they could be spending in their own home, and CityFHEPS delays have very real repercussions for homeless families and their children. Holdups in the housing process can result in unnecessary trauma for families and excessive expenses for the City. In the past fiscal year, families with children in shelter already spent an average of 534 days there before moving out.² While staff at organizations like Win work to provide intentional and trauma-informed care to all clients in shelter, the perilous experience of homelessness has an inherent impact on families and children. The stress of experiencing

² Jeanmarie Evelly, "NYC's Homeless Shelter Population Ballooned in 2022. How Will Leaders Address the Crisis This Year?" *CityLimits* January 17, 2023. https://citylimits.org/2023/01/17/nycs-homeless-shelter-population-ballooned-in-2022-how-will-leaders-address-the-crisis-this-year/?mc_cid=2a90c2ff88&mc_eid=ef2de08f11



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homelessness can cause or exacerbate anxiety, depression, and other mental health issues.³ For children, especially, the impact can be profound. Children experiencing homelessness are more likely to have poor physical and mental health and are at heightened risk for intimate partner violence, addiction, and depression.⁴ Attendance rates for students living in shelter are almost 11 percent lower than their permanently housed peers.⁵ Homelessness also takes a significant toll on the City as a whole. *The average daily cost to house a family in New York City Shelter is \$188, while CityFHEPS vouchers cost just \$72 daily, a savings of \$116 per day or nearly 62 percent.*⁶ For every week that a voucher eligible family remains in shelter as opposed to moving into an apartment with CityFHEPS, it costs the city \$814, equaling \$42,328 a year per family. For New York City, optimizing the CityFHEPS voucher program is both just and economical.

Ultimately, CityFHEPS is a vital tool in the fight to end homelessness in New York, but changes are necessary for it to work as effectively as families living in shelters need it to. Win stands in support of the pre-considered legislation and resolution, and we look forward to the City addressing additional concerns. In many cases, minor administrative changes can have a huge impact on the voucher's overall effectiveness, and we hope you will support the reform we recommend. We have the power, and responsibility, to eliminate these remaining issues and, in doing so, make CityFHEPS New York City's solution to homelessness.

³ "Mental Health," *Ruff Institute of Global Homelessness*. 2017 <https://ighhub.org/understanding-homelessness/causes-intersections/mental-health#:~:text=Homelessness%2C%20in%20turn%2C%20amplifies%20poor,depression%2C%20sleeplessness%20and%20substance%20use>.

⁴ "No Longer Hidden: The Health And Well Being of Homeless High School Students," *Institute for Children, Policy & Homelessness* October 31, 2019. <https://www.icphusa.org/reports/>

⁵ "Still Disconnected: Persistently Low Attendance Rates for Students in Shelter," *Advocates for Children of New York* May 18, 2022. https://www.advocatesforchildren.org/sites/default/files/library/still_disconnected.pdf?pt=1

⁶ Ella Ceron, "NYC Mayor Urged to Abolish 90-Day Shelter Rule Amid Migrant Influx," *Bloomberg* November 20, 2022 <https://www.bloomberg.com/news/articles/2022-09-20/new-york-mayor-eric-adams-is-pressured-to-abolishhomeless-shelter-rule?leadSource=verify%20wall>