



**Testimony of Assistant Commissioner Samara Karasyk  
Outreach and Enrollment Efforts for the Rent Freeze Program  
& Introduction 798**

**New York City Council  
Committees on Finance and Aging**

**December 9, 2015**

Good afternoon Chairs Ferreras-Copeland and Chin and members of the Committees on Finance and Aging. I am Samara Karasyk, Assistant Commissioner for External Affairs at the New York City Department of Finance (DOF). I am joined by Pierre Dejean, Assistant Commissioner for Property Exemptions, Bibi Parmar, Director of the Senior Citizen Rent Increase Exemption (SCRIE) and Disabled Rent Increase Exemption (DRIE) programs — collectively known as the Rent Freeze Program — and Caryn Resnick, Deputy Commissioner for External Affairs at the New York City Department for the Aging (DFTA). Thank you for the opportunity to testify today on the many changes we have made to the Rent Freeze Program this past year and to discuss our enhanced public outreach program to increase enrollment.

In December 2014, for the first time, we came out with a report about who is eligible for SCRIE and DRIE. We used extensive data analysis to determine how many people qualify and where they reside by neighborhood. At that time, 61,219 households were enrolled in SCRIE and DRIE. We found that approximately 94,000 additional households might be eligible for the program.

We used the data in the report to determine where to focus our outreach as we amped up our efforts to enroll every eligible tenant into the program. We began an intensive, proactive outreach program to engage tenants who may be eligible for SCRIE and began to try new outreach methods to see how to best engage this population. We began these efforts by rebranding the program to make it easier for potential participants to understand what it is about. We renamed it the “NYC Rent Freeze Program.” Then we launched a targeted marketing campaign with a pilot in Brighton Beach, Brooklyn, last summer. Through close collaboration with DFTA, the Mayor’s Community Affairs Unit (CAU), elected officials, community groups, and senior centers, we embarked on a campaign to enroll every eligible household in the Rent Freeze Program in this neighborhood.

For example, our report showed that one of the top 10 neighborhoods with under-enrollment is Coney Island, Brooklyn. To start the campaign, CAU took our analysis from the report one step further by mapping out where the most eligible households were located in detail within Coney Island. This enabled us to focus our efforts even more. CAU’s mapping showed us that the

majority of the under-enrolled units are located in the Brighton Beach section of the area, and where these units are clustered. So instead of casting a wide net over all of Coney Island, we used our resources more efficiently by reaching out to senior centers, religious organizations and community groups near the targeted units. The Brighton Beach Business Improvement District, Brighton Beach Neighborhood Association, Shorefront YMCA, the Brooklyn Public Library, and others advised us on the best times and places to reach seniors. The neighborhood association, Shorefront Y, Shorefront Jewish Community Center, and JASA - Senior Center at Luna Park, all served as our main referral locations so that we had a place to send people when they needed in-person, local assistance. At least twice a week over a three-month period, we handed out packets with information about the program and applications in English and Russian. We distributed these materials at the Brighton Beach boardwalk and elsewhere throughout the neighborhood, including transit hubs and local businesses near our targeted households. The information we handed out directed people to enrollment events with our community partners or to community centers where a knowledgeable person could help them enroll in the program. We also put up posters throughout the neighborhood, and enlisted the support of dozens of area businesses, who allowed us to post information about the Rent Freeze Program in their windows. Over the summer, we handed out approximately 1,500 information packets and applications and held 40 events with 4,088 attendees in Brighton Beach.

Another aspect of our new outreach approach was to bar-code applications that we gave out at informational and enrollment events so that we could capture the success of various types of events. We have found that it takes at least a few months for people to get these applications to us, so we do not have much data yet on the effectiveness of specific events. However, we have analyzed the zip codes of the applications we have received since June, and 687 of the 13,300 applications we have received in the last 12 months were from the zip codes in the Brighton Beach, Coney Island, Gravesend, and Sheepshead Bay neighborhoods. That accounts for about 5% of all applications received. Compared to a 0.5% average increase in applications citywide, we believe this shows that our pilot outreach campaign has had real impact. We are hoping to see this trend continue as we receive more bar-coded applications from these neighborhoods.

In addition, we tried out various marketing approaches to advertise the program and events in Brighton Beach. We did two targeted mailings to drive people to events and publicize the program. We also made robocalls. We worked with local and ethnic media to advertise the program and our events. We placed ads in the Bensonhurst Bean and Sheepshead Bites. In addition, Commissioner Jiha was interviewed by Gregory Davidzon, whose popular Davidzon Russian radio program is followed by many Russian-speaking households in the Brighton Beach area. We had Rent Freeze ads in bus stations throughout the city for the month of July. We worked with NYC Media to target locations in the top 10 under-enrolled neighborhoods with these ads.

We are using our experiences in Brighton Beach to inform how we are approaching outreach in the other nine neighborhoods of the top 10 under-enrolled areas for the Rent Freeze Program. These neighborhoods are: Stuyvesant Town/Turtle Bay, Kingsbridge Heights/Mosholu, Riverdale, Kingsbridge, Throgs Neck/Co-op City, Upper West Side, Kew Gardens/Woodhaven, Upper East Side, Flushing/Whitestone, and Highbridge/S. Concourse. We just completed a Day of Action in the Highbridge/Grand Concourse section of the Bronx. On November 17<sup>th</sup>, about 50 volunteers, staff from CAU and DOF staff handed out approximately 5,000 information packets about the Rent Freeze Program at targeted bus stops and in buildings with under-enrolled units. The information distributed publicized an enrollment event on November 23<sup>rd</sup>, co-sponsored with Bronxworks at one of their community centers in the neighborhood. The packets, in English and Spanish, were made up of general program information and applications. Earlier in November, we met with a number of community groups and Council Member Vanessa Gibson to discuss how to best approach outreach in the area. Casa New Settlement, Bronxworks, Senators Serrano and Rivera, as well as Council Member Gibson, have been very helpful and supportive of our efforts.

Next, we will focus on the other eight districts on our top 10 neighborhoods where we believe there is under-enrollment in SCRIE. It is important to note that we are continuing to promote the Rent Freeze Program elsewhere throughout the City at the same time we are focusing our efforts on particular neighborhoods in the hope of educating and informing children or caretakers of potential SCRIE recipients. Last summer, Con Edison included an ad for the Rent Freeze

program in their June/July newsletter, which goes to all households that receive their services. We are also partnering with the Community Service Society (CSS) and AARP. AARP sent 10,000 postcards to seniors in target neighborhoods to promote the program and events we have been hosting with CSS this month. In addition, the Mayor's Office of Public Engagement includes Rent Freeze Outreach in their campaign to educate everyone in rent-regulated units about the zero increase on rent for this year. They are working closely with DFTA and DOF to ensure that they can refer seniors to centers if they need further assistance. We have provided Public Engagement with SCRIE applications in numerous languages, and trained their team about the program. We work with the Mayor's Office of Immigrant Affairs, DFTA, the Mayor's Office of Veteran's Affairs, the Mayor's Office for People with Disabilities, and IDNYC to partner on events that attract seniors and people with disabilities. We also work closely with elected officials to plan and participate in enrollment and informational events.

Overall, so far this year, we have held 130 events for the Rent Freeze Program with 12,288 attendees. Also, as of November 30<sup>th</sup>, DFTA has participated in approximately 200 outreach events in 2015, which reached more than 15,300 attendees. DFTA also participated in a citywide integrated benefits pilot program at 14 senior centers this year, in collaboration with Single Stop, the New York City Human Resources Administration, LiveOn NY, and other partners. Through this program, enrollment counselors at the 14 senior center sites provided eligibility screening and facilitated enrollment and recertification for a range of benefits, including SCRIE. As part of outreach for the integrated benefits program, DFTA conducted 31 presentations focusing on SCRIE and other benefits for seniors, which were attended by nearly 1,300 individuals. DFTA also distributed about 450 flyers to senior pedestrians and sent 48,000 mailers to the communities surrounding the 14 senior center integrated benefits sites in English, Spanish and Chinese, which promoted the Rent Freeze Program among other benefits. DFTA and DOF participate on monthly conference calls to coordinate efforts around the Rent Freeze Program.

Since December 2014, we have received 13,300 initial applications, and of the applications that have already had determinations, 67% qualified and have been enrolled. That is an additional 6,093 households that have been enrolled, which accounts for about 6.5% of the 94,000 eligible but not enrolled households in our report.

In addition to increasing awareness of the Rent Freeze programs, we have made numerous operational and structural changes within the agency to make sure that we keep people in the program. The Rent Freeze Program is under new leadership. Director Parmar and Assistant Commissioner Dejean have led their team in a top-to-bottom review of all of the operational processes for the program. We will be making many changes in the coming months. Two of our new tenets at the Department of Finance are transparency and excellent customer service. This translates into us being flexible and helpful when people are having trouble navigating our processes to get them the assistance they need. We do not want to lose people who are already enrolled in the program, and we want to make sure that new applicants can successfully apply if they qualify. We are beginning to change how SCRIE/DRIE applications are processed, and are providing multiple channels for review of SCRIE/DRIE determinations of approval or denial.

We seek to make the initial application process simpler for people to understand as well so that we get completed applications up front, instead of receiving partially completed applications that are in pending status for months because we have not received the necessary income or residency documentation. It is important to us that people who qualify for the Rent Freeze Program get us what we need up front so that we can quickly grant them the benefit. Currently, 42 percent of SCRIE applicants and 76 percent of DRIE applicants submit incomplete applications. We believe part of the reason for that is that the income requirements set out in the law are not at all simple. We are working on an income worksheet that people can complete before submitting their application. The worksheet would inform them up front as to whether their income qualifies them for the program or not. Another improvement underway is that we are working toward a more automated application process. We are examining how the process can be streamlined and how we can better allocate staff across processing areas for all types of exemptions to address high-volume periods in particular areas. For example, employees specializing in renewal applications would learn how to process initial applications so all staff could do processing of both types of applications. We are also working with DFTA and other City agencies in a renewed effort to see if it might be possible to get access to some data streams that would preclude the need for us to ask for certain types of documentation from applicants, such as Social Security information.

On the back-end, we have created many new channels for review when tenants receive a determination from the Department with which they believe is incorrect. We worked with City Council to draft and pass legislation that established an ombudsperson for SCRIE and DRIE. The ombudspersons began in their new roles last August and have already reviewed 200 cases. They participate in all of our policy discussions about the program and inform the changes that we are making. We also have our newly established Office of the Taxpayer Advocate, led by Diana Leyden, who is extremely passionate about making sure that all taxpayers and tenants in the Rent Freeze Program are given an independent review of their cases if they did not get the help that they needed through the normal DOF channels. Like the ombudspersons, the Office of the Taxpayer Advocate works diligently to help people, identifies systemic issues, and proposes policy and legislative solutions as needed.

The Rent Freeze Program is made stronger through the feedback of these new offices. It is also critical that we receive input from the advocates and community organizations that represent participants, potential enrollees, and landlords. For a number of years now, we have held semi-annual meetings with legal advocates for seniors and people with disabilities. These meetings have been very meaningful for us in terms of understanding where our processes need improvement. However, we seek more frequent feedback from advocates, and want to make sure we are capturing input from social services organizations that assist applicants and participants as well. Yesterday, we held a first meeting with a group of advocates that does just that. We look forward to interacting with both of these groups of advocates more frequently and continuing the open and honest dialogue that has begun.

Along with the Mayor's Office for People with Disabilities and the Mayor's Office of Veteran's Affairs, we will be meeting with advocates for people with disabilities next week. Furthermore, we are engaging with landlords for tenants enrolled in the program more closely. We want to help them navigate the program and resolve their issues as they arise as well. Another channel for feedback on the Rent Freeze Program will be Commissioner Jiha's new taskforce on the Rent Freeze Program. He will be hosting quarterly meetings with a group of advocates that represent

tenants and landlords to ensure that we have a meaningful dialogue about the program, can work together on changes, and are able to address any issues that arise.

One example of an issue we are addressing is related to complaints we have received that our renewal process is not working as well as it should. We will be making an extraordinary effort to keep people in the program, and we will be relying on you to help us catch people before they lose this critical benefit. We are going to email each Council Member directly every month the list of constituents in your districts who need to renew their Rent Freeze benefits. We will also be sending these lists to our advocacy and community partners.

We are looking forward to all that we will learn through input from advocates, elected officials and working together to solve problems. But sometimes, we are limited in the policy changes we can make because much of what we do here at DOF is regulated by New York State Law.

Therefore, we have advocated for a number of legislative proposals to improve the Rent Freeze Program, which are crucial in enabling us to have more leniency in its administration and to keep qualified tenants enrolled. This year, we worked with the NY State Legislature on two bills that we believe will improve the program for applicants and participants. These bills both passed and are awaiting the Governor's signature. We are hopeful they will become law by the end of the year. The first bill, A7914 (Cymbrowitz)/S5721(Savino), will allow SCRIE/DRIE beneficiaries enrolled prior to July 2015 to remain in the program if they do not meet the one-third income-to-rent requirement upon renewal as long as they meet all other requirements. This is because until recently, we did not check the one-third income-to-rent requirement at renewal as we did when people initially applied for the program. Because some participants have been enrolled in the program for years, we were concerned that they risked losing the benefit or having to pay a lot more in rent upon renewal once we began checking for the one-third income-to-rent requirement. This legislation protects them from that risk. New applicants will not face any spikes in their rent because we will be checking this requirement each time they renew.

The second bill, A7247-A (Simotas)/S5826-A (Lanza), establishes the ability for a qualifying tenant to take over a benefit when the head of household dies or permanently leaves the household. We refer to this as a benefit takeover. Before this legislation was introduced, the law

did not have any section to deal with benefit takeovers. The bill establishes a benefit takeover process, including at least a six-month time period for a qualified tenant to apply for the program.

We are working on another bill that we hope will pass the NY State Legislature this coming year. A8228 (Cymbrowitz)/S6214 (Golden) has already been introduced in both houses. This bill would allow a participant back into the program at their old frozen rent if they lose the benefit for one lease term because of an increase to their income.

In addition to seeking NY State legislation, in another effort to keep participants from losing their benefit, we have promulgated rules to allow SCRIE/DRIE beneficiaries more than six months to renew their benefit or initiate a benefit takeover if there are extenuating circumstances, such as a head of household being hospitalized. This rule gives someone with extenuating circumstances an additional 18 months from their lease expiration to renew at their old frozen rent. We are also establishing a new process for participants who miss their renewal period because they have a disability covered under the American with Disabilities Act (ADA). If they miss their renewal because of a reason covered by the ADA, we will review their case at any point after the benefit expired, and will reinstate the benefit at the old frozen rent if they can provide us the documentation we need. We originally proposed these rules through a public process in August. We made changes to them based on feedback we received from advocates — both through the formal rulemaking process, and in more informal conversations that we had. We published the final rules on Monday, and they will go into effect in January. We are confident that these new rules will help SCRIE and DRIE participants keep their benefits.

Before closing, I would like to comment on Introduction 798. We worked closely with Council Member Cornegy's Office to address concerns he raised about the confusion many tenants have about the difference between preferential and legal rent. Our collaboration is reflected in this bill. Many participants do not realize they have a preferential rent until they are enrolled in the Rent Freeze Program — this is because the program only allows for us to freeze the rent at the preferential amount if it is for the lifetime of the tenancy. In many cases, the tenant receives preferential rent only for the term of the lease. This bill seeks to clarify preferential versus legal

rent, and under what circumstances DOF will freeze rent at the preferential amount. We support this legislation; however, we are still working with the Law Department and City Council to finalize the language.

Thank you again for the opportunity to testify today. We would be happy to answer any questions you may have at this time.

# NYC Department of Finance

**REPORT ON THE NEW YORK CITY RENT FREEZE PROGRAM:  
Identifying and Enrolling Eligible Households**



## **Statement from Commissioner Jacques Jiha, Ph.D.**

### **Executive Summary**

The Mayor's housing plan, "Housing New York: A Five-Borough, Ten-Year Plan," has called attention to the affordability crisis many New Yorkers face, particularly senior citizens and people with disabilities. According to the New York City Department of City Planning, the population of senior citizens in New York City will increase by 40 percent to more than 1.4 million people between now and 2040. Today, the number of senior citizens in New York City is already close to 1 million. The escalating costs of rent and growing income inequality cause many of the poorest New Yorkers to pay a greater share of their income on housing, which means they have less money for other important needs. As a result, it has become more critical than ever to increase enrollment in the Senior Citizen Rent Increase Exemption (SCRIE) and the Disability Rent Increase Exemption (DRIE) programs, referred to in this report as "the New York City Rent Freeze Program". This important benefit "freezes the rent" of eligible senior citizens and renters with disabilities at the time of enrollment and provides valuable financial assistance to the City's most vulnerable citizens.

Our research indicates that as many as 155,366 households may qualify for these programs. Of this number, 61,319 already receive the benefit, and as many as 94,047 additional City residents that are not enrolled could be eligible. This suggests that the current enrollment rate is approximately 39% of what it could be. The reasons eligible residents are not enrolled are cultural factors, including language barriers; insufficient public communication through government and the media, and a negative perception of receiving government support. This report is the first step in a targeted effort to better identify SCRIE and DRIE candidates and greatly reduce the perceived and actual barriers affecting enrollment.

To identify additional eligible recipients for these programs, we engaged in the extensive and challenging exercise of creating a dataset to determine how many households in New York City potentially qualify for the NYC Rent Freeze Programs. This report relies on data from the United States Census Bureau's New York City Housing and Vacancy Survey to identify the total number of eligible households citywide for SCRIE and DRIE and the neighborhoods with the largest under-enrolled populations.

#### **KEY POINTS:**

- **HISTORY AND ELIGIBILITY:** SCRIE was established by New York State law in 1970 for tenants in rent-controlled and rent-stabilized apartments. In 1976, eligibility was extended to tenants in Mitchell-Lama apartments. DOF began administering the SCRIE program for rent-controlled and rent-stabilized apartments in 2009. The Department of Housing Preservation and Development (HPD) has administered the program for Mitchell-Lama properties since its inception. DRIE was established in New York City in 2005 through an amendment of the SCRIE law. DOF administers DRIE for all qualifying properties. For both of these programs, aside from the requirement to live in rent-controlled, rent-stabilized or Mitchell-Lama apartments, those eligible must have a total household income of less than \$50,000 and pay more than one-third of their total household income towards rent. In May

2014, Mayor Bill de Blasio signed a bill passed by the New York City Council increasing the SCRIE income limit to \$50,000 from \$29,000 after the State Legislature amended the SCRIE law in March 2014. Shortly thereafter, the DRIE Law was also amended by the State to permit the income limit to be increased to \$50,000. In August 2014, the Mayor signed a bill passed by the New York City Council that increased the DRIE income limit to \$50,000. Both laws stipulated the income increase was effective with applications received on or after July 1, 2014.

- **ACTIVE POPULATION:** Of the 61,319 households currently enrolled in both programs, 19,991 are in Manhattan; 16,633 are in Brooklyn; 12,424 are in Queens; 11,836 are in the Bronx; and, 435 are on Staten Island. The average SCRIE participant has been in the program for 9.1 years, has an average household size of 1.4 persons, and is 76.5 years old with a household income of \$16,504. For the DRIE participant, the average time in the program is 4.4 years, with a household size of 1.2 persons. The average age is 58.0 years old and the annual household income averages \$13,516.
- **ELIGIBLE POPULATION ESTIMATES:** We estimate that 94,047 households, or 61% of the eligible population of 155,366, may not be taking advantage of the benefit. Only about 10% of these are newly eligible households due to the recent income limit increase of \$50,000.
- **UNDER-ENROLLED NEIGHBORHOODS:** This report identifies the top 10 City neighborhoods with the highest number of non-participating eligible households for SCRIE. They are: Stuyvesant Town/Turtle Bay, Coney Island, Kingsbridge Heights/Mosholu, Riverdale/Kingsbridge, Throggs Neck/Co-op City, Upper West Side, Kew Gardens/Woodhaven, Upper East Side, Flushing/Whitestone, and Highbridge/S. Concourse.
- **OUTREACH:** Enrollment numbers have remained more or less constant for the last fifteen years. Therefore, there is a need for a better, targeted outreach approach to inform and enroll eligible New Yorkers. Efforts will include a rebranding of materials, to rename the program The New York City Rent Freeze Program for senior citizens and tenants with disabilities. New materials will be available in English and six additional languages. Outreach efforts will leverage the participation of partners including key elected officials, The Mayor's Office for People with Disabilities, non-profit organizations, and houses of worship.

This report highlights neighborhoods where enrollment is the lowest and outlines the enrollment and outreach strategies needed to further our commitment to communities and individuals in need of the most basic support in maintaining a home.



Jacques Jiha, Ph.D.  
Commissioner, NYC Department of Finance

## **I. INTRODUCTION**

In the spring of 2014, New York State amended the law that governs the Senior Citizen Rent Increase Exemption (SCRIE) and the Disability Rent Increase Exemption (DRIE) to increase the qualifying income limits for these programs. This change, along with the Administration's focus on affordable housing, makes it an opportune time for the New York City Department of Finance (DOF) to do a comprehensive analysis to determine how many tenants in New York City could qualify for SCRIE and/or DRIE, and of those, how many are not enrolled.

Since the SCRIE and DRIE programs began, there have been many efforts to increase enrollment, but the location, number, and demographic of non-participating eligible tenants was indiscernible. The objectives of this report are to identify the size of the eligible population and develop an outreach plan to enroll as many eligible candidates as possible. Over the years, the number of applications and recipients has remained relatively stable. Based on available data, we estimate the size of the likely SCRIE eligible population to be 121,729 and the DRIE eligible population to be 33,637, for a total of 155,366. These numbers include the 61,319 households already enrolled in these two programs. According to these estimates, the utilization rate for SCRIE is 43% and for DRIE is 27%, and the overall utilization rate is 39%. Our goal is to increase this utilization rate by ensuring that every eligible household takes part in these valuable programs.

An important component of this analysis is to determine which communities are most in need of outreach for SCRIE and DRIE. DOF's analysis identifies the 10 neighborhoods that would most benefit from increased participation in these important programs: Stuyvesant Town/Turtle Bay, Coney Island, Kingsbridge Heights/Mosholu, Riverdale/Kingsbridge, Throggs Neck/Co-op City, Upper West Side, Kew Gardens/Woodhaven, Upper East Side, Flushing/Whitestone, and Highbridge/S. Concourse. While there have always been outreach efforts for SCRIE and DRIE, it has become clear that it is time for a new, enhanced plan, which targets specific neighborhoods and ethnic communities. This improved outreach program will rely on close partnerships with elected officials, advocacy groups, and community-based organizations.

## **II. OVERVIEW OF SCRIE AND DRIE PROGRAMS**

SCRIE and DRIE were established to protect low-income tenants who reside in rent-regulated units from rent increases. For those who qualify, rent is frozen at the time of application approval, protecting participants from future increases. Participating landlords receive a property tax credit to cover the increase in rent.

### **A. A Brief History of the Programs**

The SCRIE program was established by New York State law in 1970 for tenants residing in rent-controlled and rent-stabilized apartments with the option for municipalities throughout the State to elect whether or not to implement the program. That same year, the New York City Council and the Mayor adopted SCRIE in New York City. In 1976, SCRIE was extended to eligible tenants in certain rental and cooperative apartments in buildings subject to Articles II, IV, V or XI of the New York State Private Housing Finance Law or subject to a federally insured mortgage pursuant to Section 213 of the National Housing Act. This latter category will be referred to as “Mitchell-Lama” apartments.

In the City, the SCRIE program was first administered by the Department of Housing Preservation and Development (HPD). Later, the administration of SCRIE for rent-controlled and rent-stabilized apartments was transferred to the Department for the Aging (DFTA) while the administration of SCRIE for Mitchell-Lama units remained with HPD. On September 18, 2009, through legislation passed by the City Council, DFTA transferred the administration of SCRIE for rent-controlled and rent-stabilized units to the Department of Finance (DOF).

The DRIE program was established in New York State through an amendment of the SCRIE law and applies to tenants residing in rent-controlled, rent-stabilized, and Mitchell-Lama apartments. In October 2005, the New York City Council and the Mayor adopted DRIE in New York City. DOF has administered the DRIE program for all apartment types since its inception.

### **B. SCRIE and DRIE Requirements**

The programs have similar requirements:

- Applicants must rent an apartment that is rent-controlled, rent-stabilized, or is part of a Mitchell-Lama development;
- Applicants must have a total annual household income of \$50,000 or less; and
- Applicants must pay more than one-third of the household's total monthly income for rent.

In addition, for SCRIE, the applicant must be at least 62 years old, while for DRIE, the applicant must be at least 18 years old and receive one of four Federal disability benefits:

- Federal Supplemental Security Income (SSI);
- Federal Social Security Disability Insurance (SSDI);
- U.S. Department of Veteran's Affairs disability pension or compensation (must be military service-related disability pension); or
- Disability-related Medicaid (if the applicant has received either SSI or SSDI in the past).

## **Recent Legislative Changes**

In May 2014, Mayor Bill de Blasio signed a bill passed by the New York City Council increasing the SCRIE income limit to \$50,000 from \$29,000 after the State Legislature amended the SCRIE law in March 2014. Shortly thereafter, the DRIE Law was also amended by the State to permit the income limit to be increased to \$50,000. In August 2014, the Mayor signed a bill passed by the New York City Council that increased the DRIE income limit to \$50,000. Both laws stipulated the income increase was effective with applications received on or after July 1, 2014.

The changes to the income limits not only allowed more tenants to qualify for the programs but also brought parity between the two programs. Prior to the law change, the SCRIE income limit had been \$29,000 per household since 2009; in contrast, the DRIE income limit had been \$20,412 for single-person households and \$29,484 for households with more than two people in residence. In addition, the DRIE income limits were previously tied to cost of living adjustments issued by the Social Security Administration rather than strictly tied to an amount in the city and state laws.

### **C. SCRIE/DRIE Active Participant Demographics**

#### **Citywide SCRIE/DRIE Distribution**

Over 61,000 households are currently enrolled in SCRIE/DRIE. Table 1 and Figure 1 demonstrate that benefit utilization is dispersed throughout most of the City, with some areas more densely utilized than others. Of the approximately 2.1 million renter occupied households throughout the city, about 1.1 million are under a SCRIE/DRIE eligible apartment type. Table 2 highlights the enrollment rate for these households.

Demographics of income and age, as well as eligibility criteria influence the number of participants and explain why concentrations of households receiving the SCRIE/DRIE benefit are clustered in specific areas around the City. Because living in a rent-regulated apartment is a key component of eligibility, any area's potential density is directly related to its number of regulated apartments.

Figure 1: New York City SCRIE & DRIE Household Density  
 Current SCRIE/DRIE Enrolled Units as a Percentage of Renter-Occupied Units by Census Tract  
 Population of 61,319 Enrolled Units and 2,072,784 Rental Units  
 (Rental Household Counts From U.S. Census Bureau, 2008-2012 American Community Survey; Table B25003 by Census Tract)

SCRIE and DRIE enrolled households are located throughout the City. Darker shaded areas indicate that higher rates of rental units are enrolled in the programs.

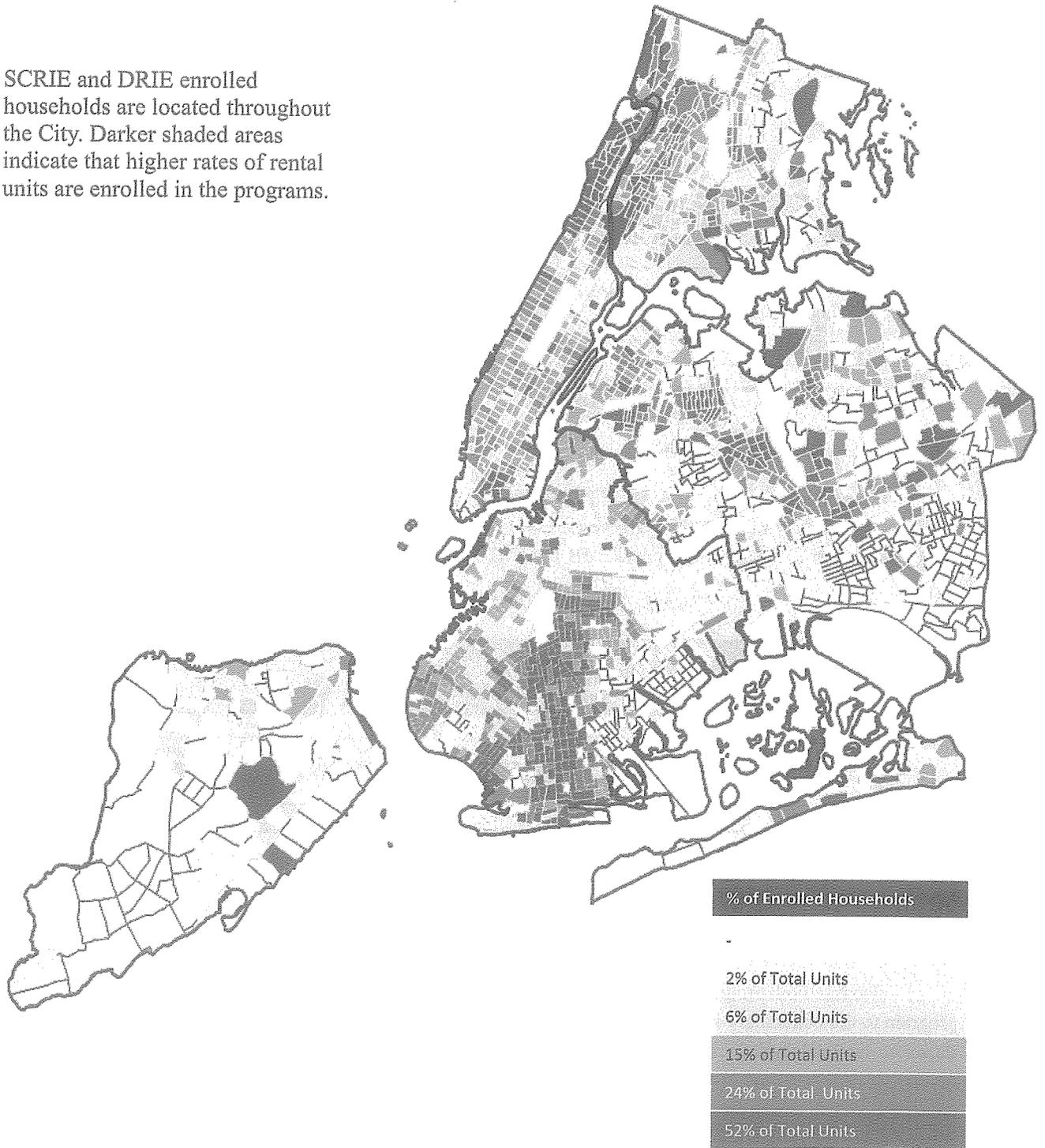


Table 1: Benefit Type by Borough

		Benefit Type		Total
		SCRIE	DRIE	
Borough	Bronx	9,015	2,821	11,836
	Brooklyn	14,582	2,051	16,633
	Manhattan	17,212	2,779	19,991
	Queens	10,995	1,429	12,424
	Staten Island	367	68	435
Total		52,171	9,148	61,319

Table 2: SCRIE/DRIE Program Households (HH) as Percent of Regulated HH\*

		Program HH as Percent of Rent Regulated HH		
		Program Households	# of Rent Regulated HH	% Program Households
Borough	Bronx	11,836	253,686	4.7%
	Brooklyn	16,633	327,599	5.1%
	Manhattan	19,991	304,897	6.6%
	Queens	12,424	201,562	6.2%
	Staten Island	435	8,420	5.2%
Total		61,319	1,096,164	5.6%

\*Regulated Households Displayed are Program Eligible Types (Rent Controlled, Rent Stabilized, and Mitchell Lama Rentals & Co-ops); Counts From NYC Housing and Vacancy Survey 2011

### Active Participant Demographics

Households receiving the SCRIE/DRIE benefit tend to be one-person households and have annual incomes below the prior (\$29,000) income threshold. As demonstrated in Table 3, below, the aggregated benefit indicators are similar for both SCRIE and DRIE participants.

Table 3: SCRIE\* and DRIE Key Program Indicators

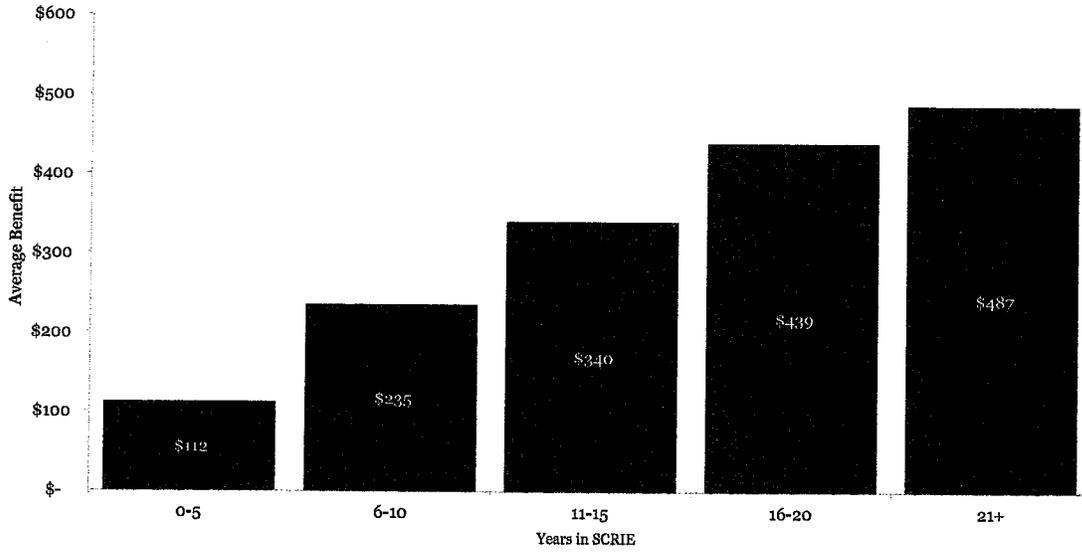
		Years in Program	Household Size	Householder Age	Annual Household Income	Legal Rent	Frozen Rent	Monthly Benefit Amount
SCRIE	Average	9.1	1.4	76.5	\$16,504	\$1,005	\$755	\$250
	Median	8.0	1.0	76.0	\$14,423	\$929	\$690	\$213
DRIE	Average	4.4	1.2	58.0	\$13,516	\$990	\$802	\$189
	Median	5.0	1.0	59.0	\$12,144	\$933	\$753	\$176

\* Detailed information on SCRIE recipients does not include Mitchell Lama

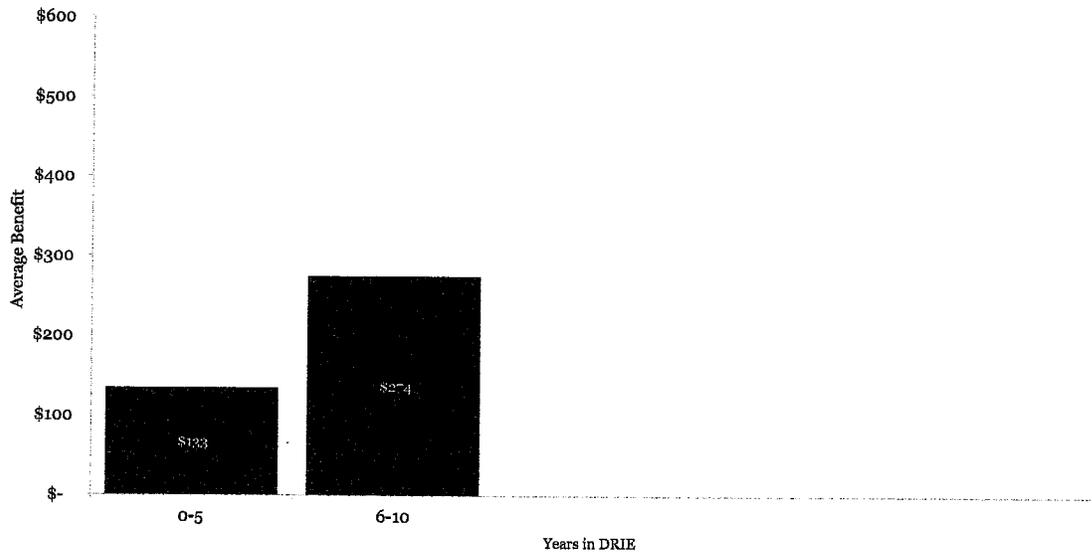
### Time Value of the Benefit

Because both programs effectively “freeze” the rent of the benefit recipient, the value of the program to the beneficiary increases over time. Chart 2 and Chart 3 illustrate the average benefit to the tenant by his/her length of time in the program. Chart 4 and Chart 5 display the growth of the benefit as a percent of total rent paid over time. Average SCRIE benefits are higher because of the program’s longer existence; hence, participants have been enrolled for a longer amount of time. Although DRIE is a newer program, it is expected to follow a similar pattern.

**Chart 2: SCRIE Active Participants  
Average Monthly Benefit Amount\* by Years in Program**

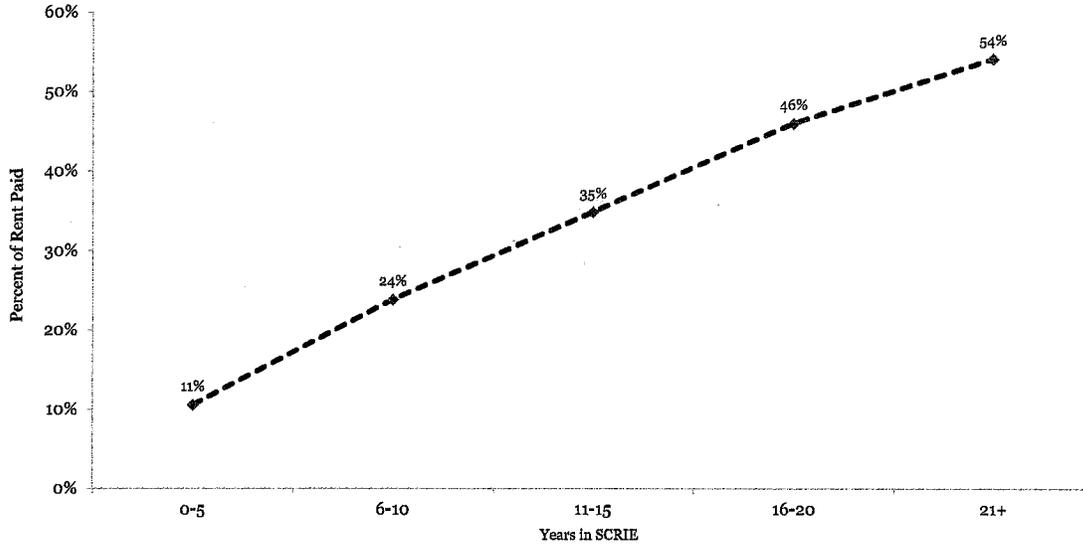


**Chart 3: DRIE Active Participants  
Average Monthly Benefit Amount\* by Years in Program**

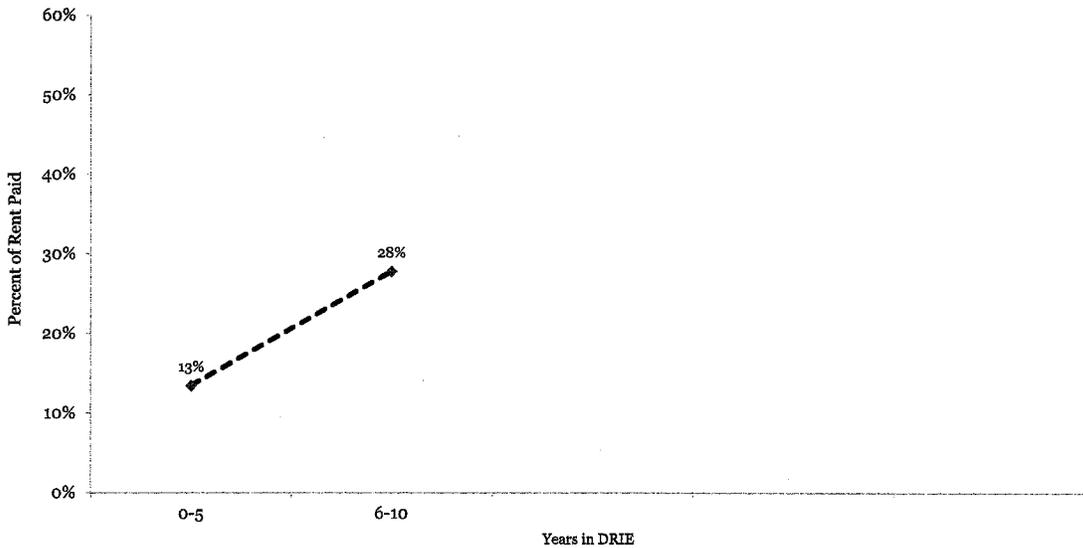


\*Average monthly benefit reflects the average dollar amount a tenant's rent is reduced by the program.

**Chart 4: SCRIE Active Participants  
Average Monthly Benefit Amount as Percentage of Total Rent\*  
by Years in SCRIE**



**Chart 5: DRIE Active Participants  
Average Monthly Benefit Amount as Percentage of Total Rent\*  
by Years in DRIE**



\*Total Rent reflects the portion of a tenants rent reduced by the program (example: Tenants rent = \$1,000; Benefit Amount = \$100; Tenant Pays \$900; Percent of Total Rent = 10.0%)

### **III. METHODOLOGY**

For years, there has been a dearth of information on the actual size of the eligible SCRIE and DRIE universe. We set out to locate an existing dataset that would allow us to determine the exact number of households that qualify for SCRIE or DRIE and, of those, to identify the specific units that do not receive the benefit.

After an extensive search for an existing dataset, including various efforts and conversations with other government agencies such as the New York State Division of Housing & Community Renewal (DHCR), which regulates the majority of the units that qualify for SCRIE and DRIE, it was eventually concluded that there is no one dataset that has individual level data that illustrates whether a household meets the multiple criteria to qualify for the SCRIE or DRIE programs.

#### **Acquiring a Dataset**

DOF then embarked on a project to increase its knowledge of eligible tenants by creating such a dataset. Unfortunately, many of the datasets that could be used to piece together a list of this kind are legally inaccessible. For example, state law prohibits the use of DHCR's rent-regulated housing roster for any outreach related purposes. We were able to use the list of rent-regulated buildings from DHCR for this analysis, but could not utilize unit specific information.

Given the limitations of acquiring new datasets for the study, DOF examined linking publicly accessible datasets with the City's SCRIE and DRIE data in order to identify potentially eligible households. The following includes some of the datasets studied:

- Active DOF SCRIE and DRIE participants per property;
- Active HPD SCRIE (Mitchell-Lama) participants per property;
- City properties with their corresponding census tract for geographical matching;
- Counts of rent-stabilized units in buildings calculated using publically available tax data;
- Demographic information from the U.S. Census Bureau's American Community Survey (ACS); and
- Survey Data from the U.S. Census Bureau's New York City Housing and Vacancy Survey (HVS).

Although the ACS could be used for estimates on Citywide SCRIE/DRIE eligible households, its lack of detailed information on the rent regulation status of New York City apartments meant that it could not work for our purposes. Therefore, DOF decided the best dataset to use for estimates was the HVS. The information on demographics related to potentially eligible populations shown in this report was derived primarily from the 2011 HVS. The U.S. Census Bureau administers this survey every three years. A full download of the Housing and Vacancy Survey Report is available on HPD's website (<http://www.nyc.gov/html/hpd/html/pr/vacancy.shtml>). Likewise, the dataset used for population estimates in this report is available for download on the U.S. Census Bureau's website (<https://www.census.gov/housing/nychvs/data/2011/userinfo2.html>).

DOF consulted with other City agencies (DFTA, Office of Management and Budget (OMB), and HPD) as well as New York City Council economists, who all agreed the HVS was the best data source for DOF to use for its analysis.

### **Key Strengths of the HVS**

The HVS's New York City centric design made it the best resource for a Citywide estimate on SCRIE and DRIE eligible populations. The survey's information on regulated housing types as well as household demographics provided the best mix of criteria to assess eligibility. Additionally, the HVS breaks the City down into sub-boroughs, which can then be matched at the census tract level to other datasets for additional analysis. The HVS's accessibility allows for the methodology used here to be replicated, expanded upon, and tweaked based on user or future outreach needs. Because this dataset is publicly available, it allows for others to duplicate our analysis independently.

### **Limitations of the HVS**

The HVS occupied household and person data files that were used to complete our estimates contain a sample of approximately 16,000 households. While this is a large sample size, when drilling down to criteria as specific as SCRIE/DRIE eligibility at the sub-borough (or neighborhood) level, the numbers become much smaller. The HVS advises that as numbers reduce in size, more caution should be taken with their interpretation. For example, even though two sub-boroughs currently have approximately 350 active SCRIE or DRIE recipients, our analysis predicted that those same two sub-boroughs would have no eligible households.

Of the two programs, the HVS better predicts SCRIE eligibility than DRIE eligibility. The reason for this is that while the HVS survey includes questions that identify a respondent's age, household income, apartment type, and household income to rent ratio, which are the eligibility criteria for SCRIE, the survey does not include a question asking whether a tenant is receiving one of the four Federal disability benefits required to receive DRIE. Therefore, DOF used responses to various income-related questions as a proxy for DRIE eligibility. In addition, there is some anecdotal evidence to support the HVS may overstate the total number of units eligible for SCRIE and DRIE within Mitchell-Lama buildings. Many of the potentially qualifying households in Mitchell-Lama developments are already in receipt of other housing benefits such as the Rent Assistance or Capital Grant Programs, which would deem any SCRIE/DRIE applicant ineligible. It is possible that these non-compatible programs were not flagged by the HVS. Given these limitations, we will closely monitor Mitchell-Lama enrollment rates and outreach efforts in partnership with HPD.

Despite these limitations, combining the HVS with other data from the U.S Census Bureau, DOF, HPD, and other sources provides a strong starting point for establishing the eligible populations for SCRIE and DRIE.

### **Breaking out SCRIE and DRIE by Age**

Given the eligibility criteria overlap between the two programs and our desire to avoid double counting eligible populations for the purposes of this report, we have counted all potentially eligible recipients who were 62 years of age and older as SCRIE eligible. Potentially eligible recipients who were

61 years of age and younger who were thought to meet the additional DRIE disability criteria were classified as DRIE eligible.

### **Estimating SCRIE/DRIE Populations**

The outline below demonstrates the methodology DOF used to project SCRIE/DRIE eligibility using the HVS. The methodology includes a 10% income increase to allow for deductible income sources such as federal, state and local income taxes, as well as Social Security and Medicare taxes. This means that, rather than using \$50,000 as the income threshold, we used \$55,000 to account for allowable deductions that are subtracted from the total household income when calculating SCRIE or DRIE eligibility. The 10% figure is derived from current deductible income averages.

#### **1) SCRIE Eligibility**

To be selected as a potential recipient of SCRIE the following criteria were used:

- a. Householder age of 62 or older;
- b. A total household income of 10% over the maximum income threshold of \$50,000;
- c. A monthly gross rent as a percent of household income greater than one-third;
- d. Household residing in an eligible unit type: rent-stabilized, rent-controlled, Mitchell-Lama rental or Mitchell-Lama coop; and
- e. Household must not have a Federal Section 8 voucher.

#### **2) DRIE Eligibility**

To be selected as a potential recipient of DRIE, households would need to meet requirements b through e from the SCRIE eligibility criteria listed above and have answered additional income questions from the HVS :

- a. Householder age of 61 or younger; and
- b. Householder has "Income From Social Security or Railroad Retirement Payments;"
  - i. This was used as an indicator of SSDI. Reported monthly income for the individual would have to be less than \$1,071 to be flagged.
- c. Householder has "Income from SSI, TANF (Temporary Assistance for Needy Families), Family Assistance, Safety Net, or Other Public Assistance or Public Welfare Payments (including shelter allowance)" and, at the household level reported "Supplemental Security Income (SSI);"
  - i. This was used as an indicator of SSI. Reported monthly income for the individual would have to be less than \$1,528 for single householders and \$2,250 for non-single householders to be flagged.
- d. Householder has "Income From Retirement, Survivor, or Disability Pensions (not including Social Security)."
  - i. This was used as an indicator of Veteran's Affairs disability pension.

## IV. STUDY RESULTS

### **Eligible Population Estimates**

DOF estimates that there are approximately 155,000 households currently eligible for either SCRIE or DRIE Citywide. Of that total, 78% are eligible for SCRIE and 22% for DRIE. Combining these numbers with existing datasets on active SCRIE and DRIE populations allows us to create a profile of what utilization looks like throughout the City. Also, we can see what parts of the City are taking advantage of the SCRIE/DRIE benefit at the neighborhood level.

### **New \$50,000 Income Limit**

The estimates demonstrate the impact of recent legislative changes that increased income thresholds. Both programs increased their potentially eligible populations by an aggregate of approximately 10%. SCRIE went up by 9% and DRIE by 10%. The increased number of eligible tenants resulting from a \$21,000 income limit increase was not as significant as DOF anticipated largely because of the one-third rent-to-income ratio program requirement. The higher the household income, the less likely it is that a tenant will spend that high a portion of her or his income on rent and qualify for the benefit.

### **Prior Income Limits**

Although the new legislation increased the eligible population, the majority of eligible households remain at lower income levels. About 90% of all eligible households have a total household income of \$29,000 or less. The tables below display the total number of eligible households that qualified under the old income threshold and those that qualify based on the new income threshold. These numbers include households that are already enrolled in the programs. The total number of eligible households is 155,366.

Table 4: SCRIE Total Eligible Estimates (Enrolled and Not Enrolled)

SCRIE		Total Income Categories		Total
		<=29,000	>29,000 & <=50,000	
Borough	Bronx	18,783	2,398	21,181
	Brooklyn	32,082	2,988	35,070
	Manhattan	32,833	2,802	35,635
	Queens	26,919	2,129	29,048
	Staten Island	795	-	795
Total		111,412	10,317	121,729

Table 5: DRIE Total Eligible Estimates (Enrolled and Not Enrolled)

DRIE		Total Income Categories		Total
		<=29,000	>29,000 & <=50,000	
Borough	Bronx	8,722	1,677	10,399
	Brooklyn	11,266	370	11,636
	Manhattan	7,248	152	7,400
	Queens	2,917	887	3,804
	Staten Island	398	-	398
Total		30,551	3,086	33,637

Table 6: SCRIE / DRIE Total Eligible Estimates (Enrolled and Not Enrolled)

SCRIE/DRIE Total		Total Income Categories		Total
		<=29,000	>29,000 & <=50,000	
Borough	Bronx	27,505	4,075	31,580
	Brooklyn	43,348	3,358	46,706
	Manhattan	40,081	2,954	43,035
	Queens	29,836	3,016	32,852
	Staten Island	1,193	-	1,193
Total		141,963	13,403	155,366

### Citywide Utilization Rates

When the total eligible SCRIE and DRIE population estimate is compared against the current 61,319 households receiving the benefit, the utilization rate for these programs stands at 39%. As many as 94,047 eligible households, or 61% of all those eligible, are not taking advantage of the benefit. The vast majority of non-participating apartments falls within the original income threshold for both programs and therefore may have been eligible prior to the income threshold increase adopted this year. Table 7 shows the counts of estimated eligible households not enrolled.

Table 7: Eligible Households Not Enrolled by Borough

		Benefit Type		Total
		SCRIE	DRIE	
Borough	Bronx	12,166	7,578	19,744
	Brooklyn	20,488	9,585	30,073
	Manhattan	18,423	4,621	23,044
	Queens	18,053	2,375	20,428
	Staten Island	428	330	758
Total		69,558	24,489	94,047

There is a notable difference when the enrollment rates are broken down by program. Overall, the actual SCRIE enrollment rate is estimated to be at about 43%, while the enrollment rate for DRIE is about 27%. Two reasons may explain the difference: 1) the DRIE program has been in effect for far fewer years; and 2) tenants with disabilities may be more difficult to reach because they are more spread out throughout the City, whereas seniors are more likely to live in particular neighborhoods.

Table 8: Percent Eligible Households Not Enrolled by Borough

		Benefit Type		Total
		SCRIE	DRIE	
Borough	Bronx	57%	73%	63%
	Brooklyn	58%	82%	64%
	Manhattan	52%	62%	54%
	Queens	62%	62%	62%
	Staten Island	54%	83%	64%
Total		57%	73%	61%

### Understanding the Enrollment Numbers

Since enrollment numbers have remained consistent since these programs began, DOF did not anticipate such a high number of potentially eligible households that are not enrolled. With a current enrollment rate of 39%, DOF needs to refocus its outreach efforts to reach every qualifying tenant.

There may be several factors contributing to a low utilization rate:

- Outreach efforts may not have reached certain ethnic populations due to issues of language access and cultural barriers.
- In recent years, these programs have not received much media attention, particularly in the ethnic media, and the names of the programs are not user-friendly for citizens unfamiliar with the programs.
- Some households may not be interested in obtaining benefits from the government because of their perceptions associated with acquiring assistance from such programs, even if they believe they might qualify.

The increase to the SCRIE and DRIE qualifying income threshold provides us with a new opportunity for outreach. In addition, the de Blasio administration is fully committed to ensuring that as many qualifying households as possible enroll in the programs.

## **V. OUTREACH PLAN**

Although DOF has made an effort to provide substantial outreach to increase SCRIE and DRIE enrollment in the past, our data analysis shows that there are many eligible households that are not benefiting from these valuable programs. Therefore, we must approach outreach in a different way to yield greater results. In addition, the population that qualifies for SCRIE is very different than that of DRIE. Seniors tend to live in particular neighborhoods, whereas people with disabilities are spread out throughout New York City. Therefore, it is crucial that the outreach to seniors and people with disabilities be split into two separate efforts.

Another key aspect to our outreach plan for both programs is our partnership with the City Council and other elected officials. We are eager to build on existing relationships with elected officials to sponsor events and distribute information regarding these programs. Council Members' relationships within communities will help access eligible households that we might not be able to reach otherwise. In addition, Council Members can help educate organizations regarding these programs so that they can provide proactive outreach and have the capability to enroll tenants into these programs themselves. We will also count on the help and support of elected officials when legislation is needed to further our outreach agenda for these programs.

### **Outreach for SCRIE**

We will work with all of our partner agencies to distribute newly developed SCRIE palm-sized information cards and posters to the senior citizens they serve in their facilities, at their events, and to their public-facing vendors. The following are among our collaboration partners:

- DFTA
- Human Resources Administration
- Parks & Recreation
- Department of Health and Mental Hygiene
- Health and Hospitals Corporation
- Mayor's Office for Immigrant Affairs
- New York City Public Libraries
- Mayor's Community Affairs Unit

### **Targeting Neighborhoods for SCRIE**

One of the keys to enrolling new SCRIE households is targeting specific neighborhoods, where data demonstrates there is a high volume of potential tenants based on the program's criteria. We are using demographic information from the census and the HVS to determine where outreach materials can be tailored to specific areas or neighborhoods. This analytical approach to outreach tells us where to focus greater resources. The following charts outline the various outreach criteria by displaying the top ten

neighborhoods where SCRIE is most under-utilized. The full table for each chart is contained in the appendices that appear at the end of this report.

We will focus our SCRIE outreach efforts first on the 10 neighborhoods that have the highest number of eligible households. These are displayed in Chart 7. The Top 10 districts are the neighborhoods with the highest percentage of under-enrolled eligible households. However, we excluded districts from this chart if there are fewer than 1,500 under-enrolled units. All rates of utilization by neighborhood are displayed in Appendix 1 at the end of this report. We will provide outreach in areas that are not shown in Chart 7 as well, but will saturate the 10 neighborhoods in the charts below with outreach efforts. We will use them to gauge its effectiveness in reaching people, and will cater the written materials to the language needs based on their demographics.

### **Outreach Initiatives**

In recent months, with the change to the income threshold, our outreach team has participated in more SCRIE-focused events than ever before. In 2013, our outreach team of four people attended approximately 130 outreach events. Of those, approximately 30 events were focused on seniors. In 2014, we will hold more than 170 outreach events. Of these, approximately 70 are focused on seniors. Regardless of whether the event targets seniors, property owners, or small business owners, our outreach staff responds to the needs of the attendees. For example, we often distribute information regarding DRIE at SCRIE events, or respond to questions about property tax exemptions if a homeowner comes to an event that is focused on tenants.

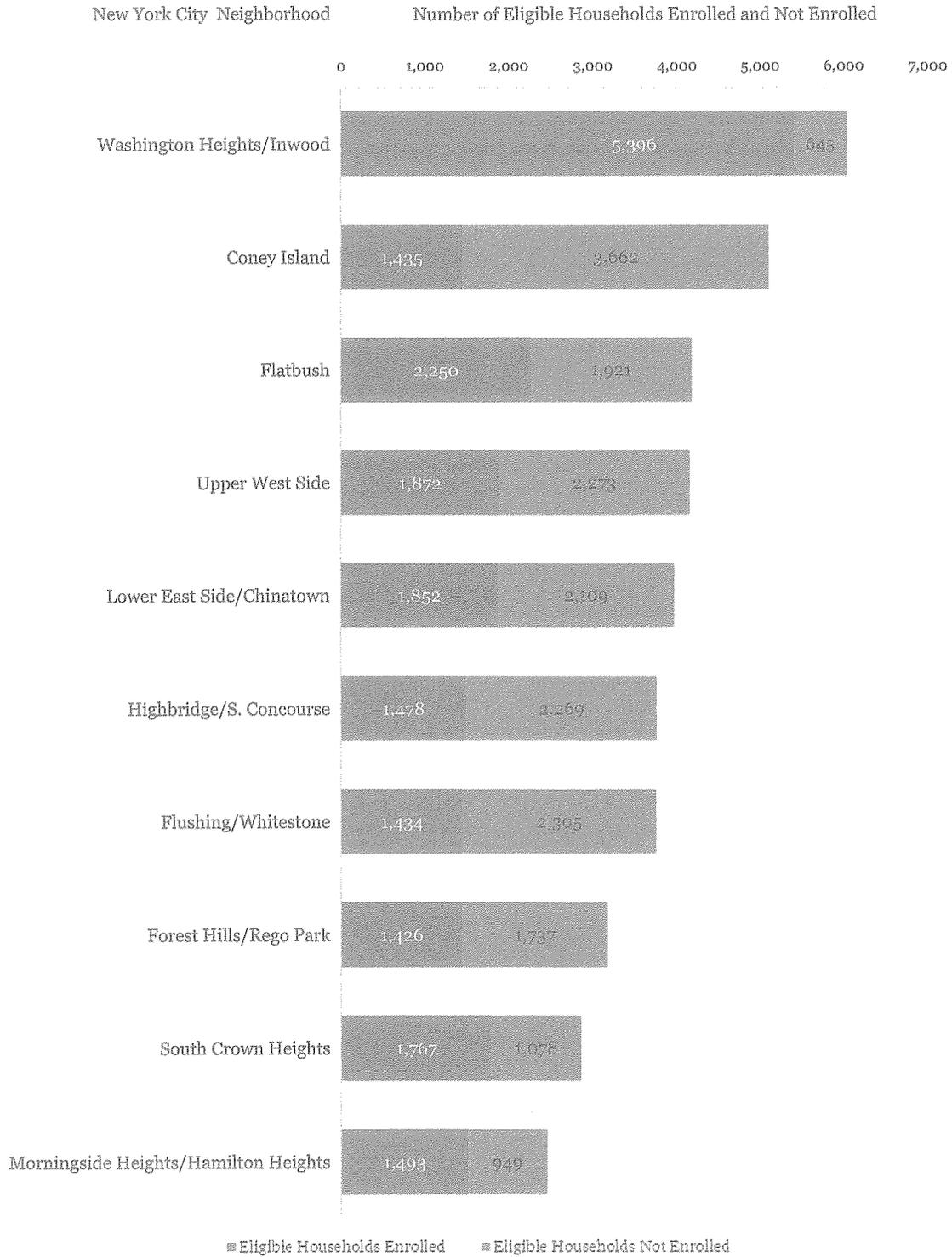
Regardless of current outreach efforts, the number of non-participating but potentially eligible households tells us that not enough people are being reached. Therefore, we will be seeking new partners for outreach, in addition to enhancing the existing relationships with elected officials, other City agencies, senior centers, advocacy groups, and community organizations. We will also develop a train-the-trainer video to teach these partners how to assist people in enrolling for SCRIE and DRIE, leveraging our own efforts by relying on partners throughout the City to help spread the word about SCRIE. In addition, since many of the potentially eligible households may not be interested in visiting a senior center, City agency, or an event focused on senior housing issues, we will seek to reach them in different ways.

Starting with the top 10 neighborhoods listed in the following charts, we will employ the following outreach tools:

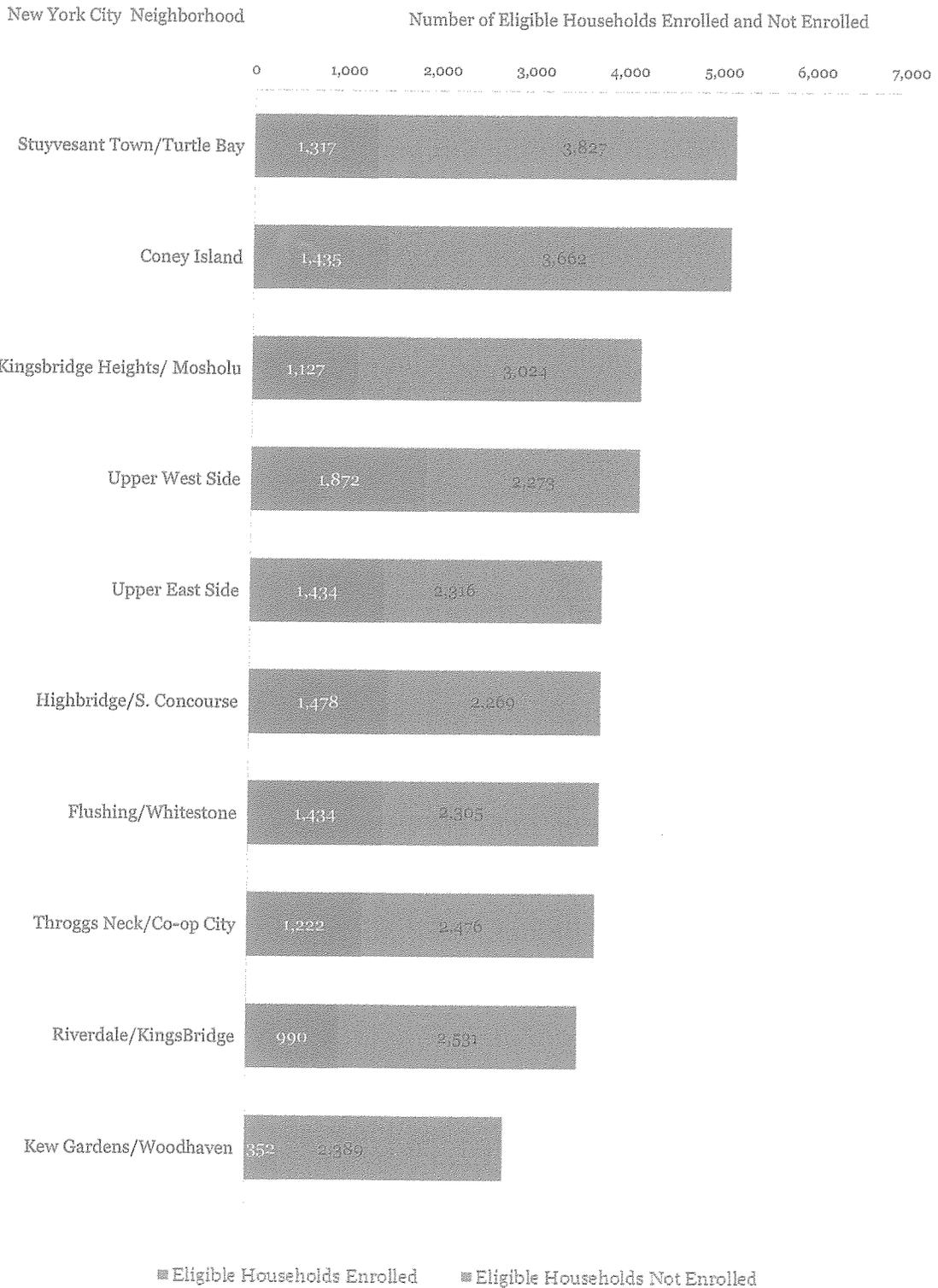
- **New SCRIE outreach materials including flyers, posters, and guides.** These will be translated into six languages (Bengali, Chinese, Haitian Creole, Korean, Russian, and Spanish), and more translations will be done upon request. The new materials feature eye-catching design and rebrand the programs as the “NYC Rent Freeze Program.” We held four separate focus groups to ensure that the new materials will be well-received and effective in attracting interest;
- **Website and Social Media:** We are rebuilding the NYC Rent Freeze Program section of our website to make the information about SCRIE and DRIE easier to understand. The new design and social media outreach should also draw the attention of the children and caretakers of seniors, in the case that under-enrolled but qualified tenants do not see the materials themselves;

- **Events:** Outreach staff will hold SCRIE enrollment and information events, in partnership with elected officials and key community partners. SCRIE information and materials will also be provided at relevant events hosted by other agencies or partners;
- **Community Partnerships:**
  - Work extensively with a wide array of community partners who can expand our outreach to their members, constituents, communities, and/or visitors. Work with them on distributing newsletter materials, outreach events, flyers for distribution, and posters for display.
  - Work with key partners to train their staff or leaders to directly assist their members with enrollment. Develop a “train-the-trainer” video, posted to our website, that will offer step by step instructions in how to assist citizens in filling out the SCRIE application and host semi-annual train the trainer events either hosted through teleconference, or in person.
  - Outreach will focus on houses of worship; immigrant, community and tenant organizations; and service and health providers for seniors; which will be reached by working with the Mayor’s CAU, MOIA, and DFTA;
- **Ethnic media:** We will work with ethnic publications and radio shows broadcast in the languages most commonly spoken by the under-enrolled but eligible populations to feature stories about SCRIE;
- **Legislation:** We are drafting State legislation that would mandate that landlords of rent-regulated apartments include information about both SCRIE and DRIE in new and renewal leases; and,
- **Phone and Mailing:** We are working with the Mayor’s Office to send a mailing to all potentially eligible households. We will also make calls to each of these households for which phone numbers are available to give them information about these programs.

**Chart 6: Top 10 City Neighborhoods with the Highest Number of Enrolled SCRIE Eligible Households**



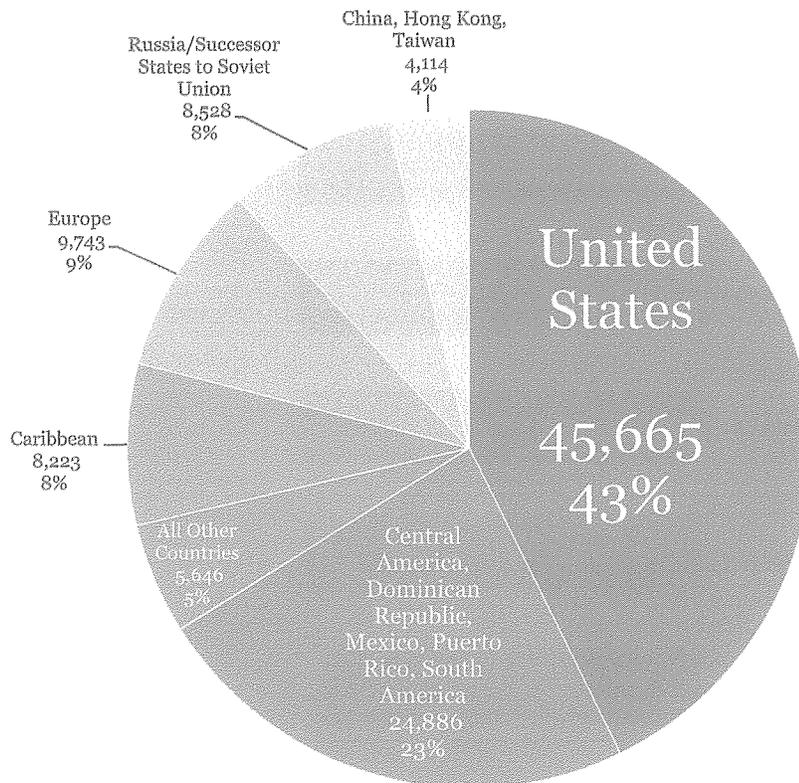
**Chart 7: Top 10 Under Enrolled City Neighborhoods**



**Customizing the Outreach Effort Using Community Specific Demographics:**

A key component of our outreach strategy is utilizing demographic data to tailor outreach efforts to meet community needs. Using U.S Census information, DOF’s outreach campaign will go beyond the sub-borough level and take a more micro view of neighborhoods at the census tract, block group, or block level. Chart 8 presents a macro view of the HVS eligible population by reported place of birth. Chart 9 takes a more micro view of the non-U.S. born eligible population broken out by neighborhood. By more closely examining the data, differences can be seen across the City’s neighborhoods including the likely languages spoken.

**Chart 8: SCRIE Eligible Households  
Householders that Reported a Place of Birth:  
(NYC Housing and Vacancy Survey 2011)**



**Chart 9: Top 10 SCRIE Target Neighborhoods**  
**SCRIE Eligible Households Non-U.S. Born Reported by Neighborhood**  
 (NYC Housing and Vacancy Survey 2011)

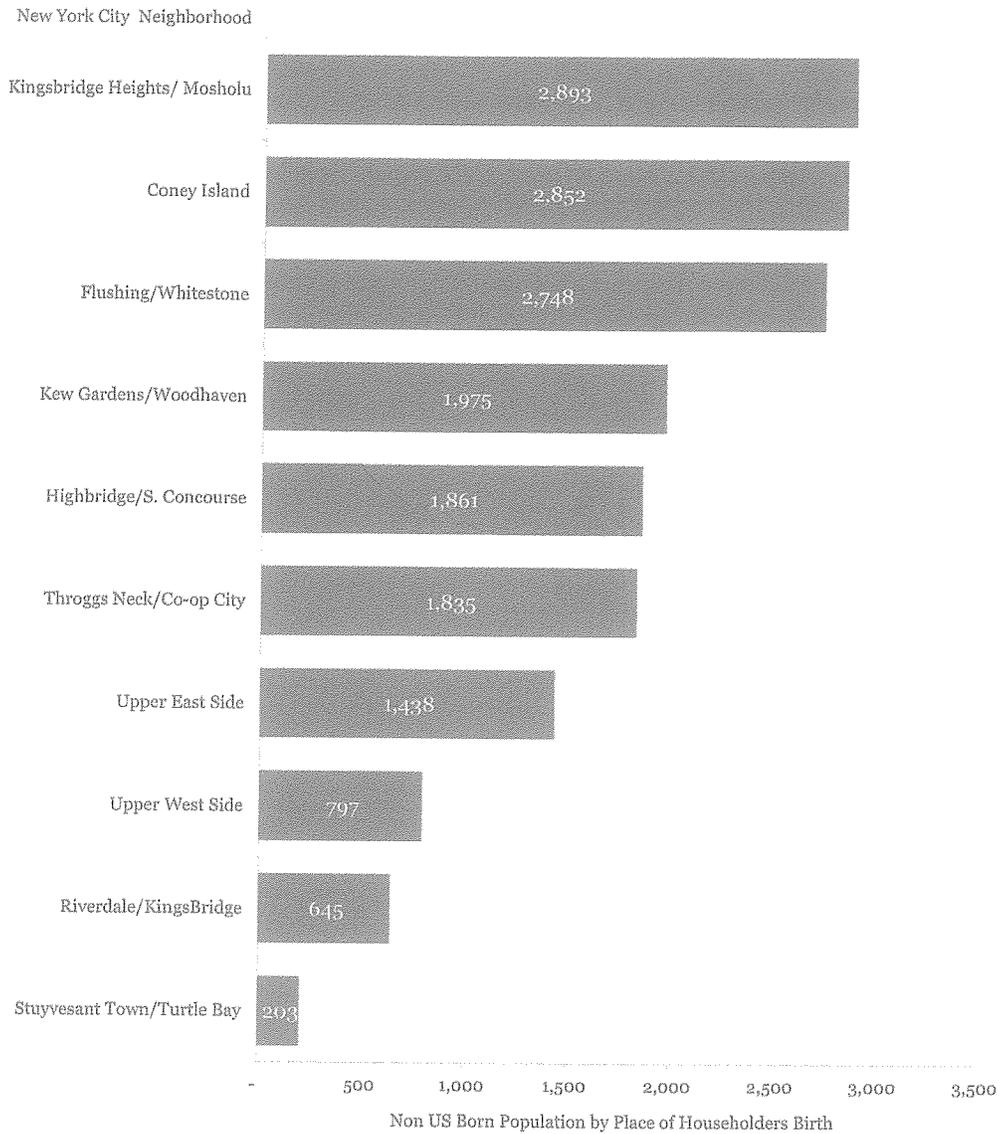
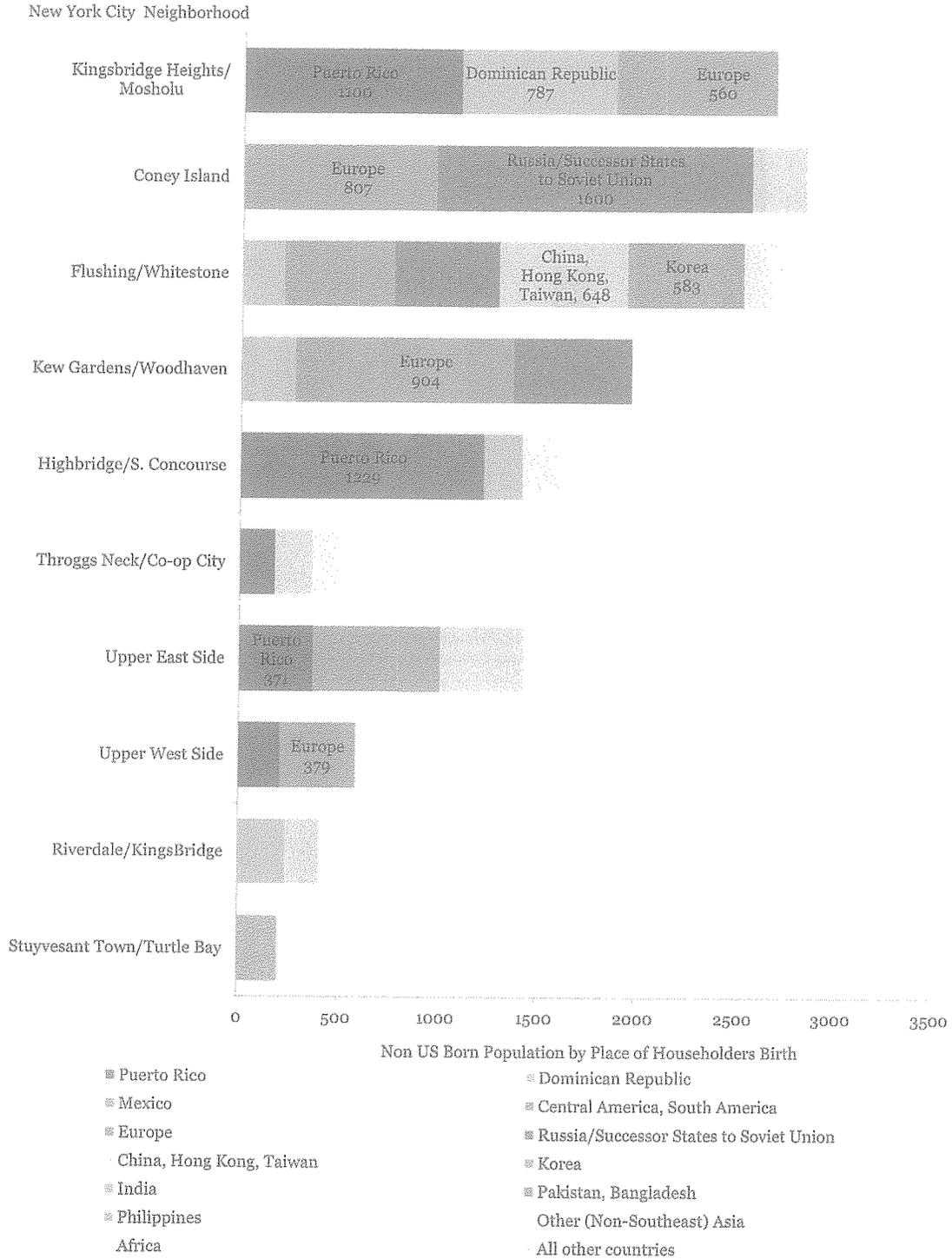
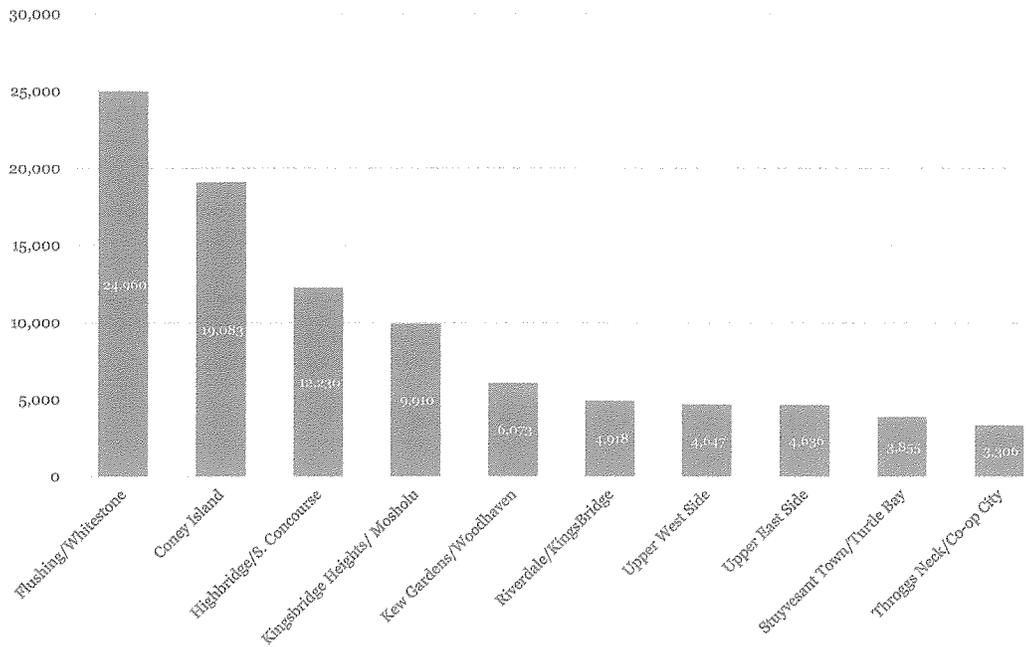


Chart 8 displays data on countries of origin for all SCRIE eligible households, and Chart 10 breaks down country of origin for the ten target neighborhoods for outreach. Chart 11 and 12 demonstrate the number of limited English speaking households by neighborhood as well as the percentage of different language categories spoken. Using this information, DOF is able to identify which neighborhoods most require language specialists, what types of languages they should speak and by examining micro data, where language specialists should be placed. This demographic information indicates that other than English, the top most spoken languages among eligible households are likely to be: Spanish, Russian, Chinese, and Korean. However, DOF closely tracks interpretation requests at all of its Business Centers and in the SCRIE/DRIE Walk-in Center to help determine language needs. In addition, DOF analyzes language needs through outreach events and requests for translation or interpretation. Currently, DOF translates all SCRIE and DRIE outreach materials, including the comprehensive guide to the program, into six languages: Bengali, Chinese, Haitian Creole, Korean, Russian, and Spanish. DOF will translate into other languages as needed.

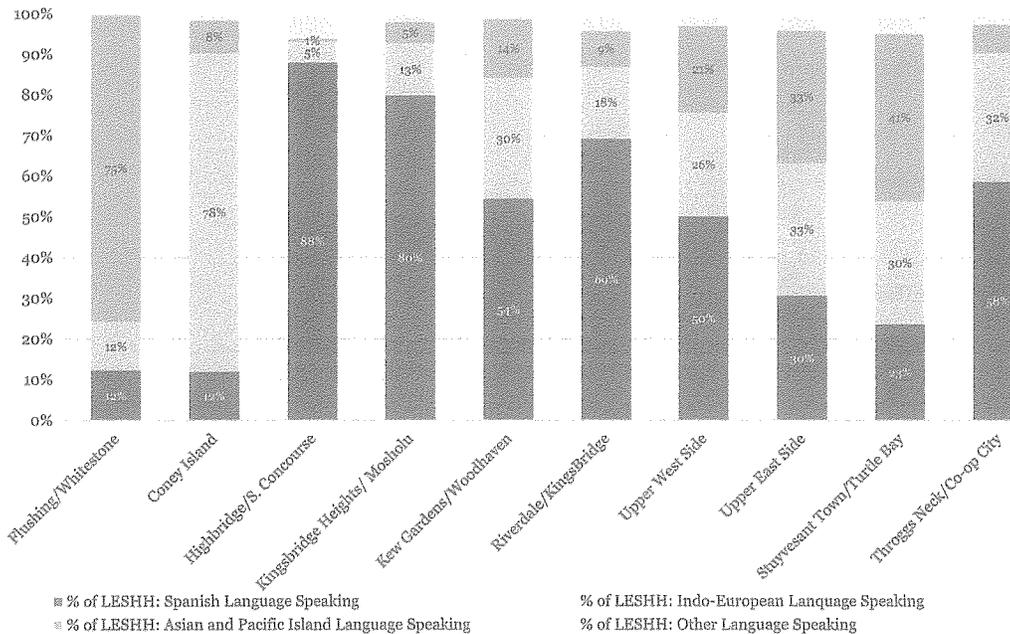
**Chart 10: Top 10 SCRIE Target Neighborhoods**  
**SCRIE Eligible Households Non-U.S. Born Reported Place of Householder's Birth**  
 (NYC Housing and Vacancy Survey 2011)



**Chart 11: Top 10 SCRIE Target Neighborhoods  
Number of Limited English Speaking Households (LESHH)\***  
(Source: U.S. Census Bureau, 2008-2012 American Community Survey; Table B16002 by Sub Borough)



**Chart 12: Top 10 SCRIE Target Neighborhoods  
Language Spoken In Limited English Speaking Households (LESHH)\***  
(Source: U.S. Census Bureau, 2008-2012 American Community Survey; Table B16002 by Sub-Borough)



\*(LESHH: No one in household 14 years old or older speaks English only or speaks English "very well")

## **Outreach for DRIE**

It is important to look at the potential DRIE population separately from the potential SCRIE population and cater outreach efforts differently. Unlike SCRIE, it is not appropriate to target specific neighborhoods for DRIE outreach because tenants with disabilities are spread widely throughout New York City. Although we will focus our efforts on districts with higher density of rent-regulated apartments, for DRIE it is important to have a more general approach to reach people with disabilities directly, both through organizations that work with this population as well as service providers. DOF is working closely with the Mayor's Office for People with Disabilities (MOPD) to enhance DRIE outreach efforts.

## **Outreach Initiatives**

DOF has not focused on outreach for DRIE as much as it has for SCRIE in the past. It is clear that we need to foster strong working relationships with new partners to help reach this population. With MOPD as our partner, we will employ these tools for DRIE outreach:

- Coordinate with Access-A-Ride to message about DRIE;
- Work with other City agencies to distribute information about DRIE to their mailing lists – particularly the Health and Hospitals Corporation, Department of Health and Mental Hygiene, New York City Housing Authority (targeting their waiting list), and the CUNY system;
- Work with local private universities and private hospitals to distribute DRIE flyers and display DRIE posters;
- Work with various organizations, service providers, and service coordination agencies that work with people with disabilities such as the Visiting Nurse Association, Independent Living Centers, Independent Care Services, Concepts of Independence, and Wheels of Progress;
- Media campaign to feature stories about DRIE in publications that cater to people with disabilities such as AARP, Able Newspaper, the MS Society, and the United Spinal Association (New Mobility Magazine);
- Informational video on the screens in handicap accessible New York City taxis;
- The same train-the-trainer video for SCRIE that gives step-by-step instructions on how to fill out the SCRIE/DRIE applications; and
- Semi-annual train-the-trainer sessions either in person or via teleconference to help organizations sign people up for DRIE.

## VI. CONCLUSION

We are confident that this report and our new outreach plan will go a long way in attracting and enrolling new participants in the New York City Rent Freeze Programs. Our goal is enroll every qualified household into these programs. However, it is important to emphasize that the outreach and recruitment efforts will be taking place over several years, as non-participants will not sign up all at once. There are cultural, language, and geographic barriers that must be overcome to enroll every eligible household in this program. SCRIE and DRIE face the same barriers of enrollment that other governmental social services programs face when attracting new households – especially the perception of some applicants towards accepting government benefits and the fact that applicants must provide documentation with their applications and complete applications in full.

We will be relying on partners in government and non-governmental organizations to achieve our ambitious goal. Some of the people who qualify for these programs may face mobility issues, or have difficulty understanding the application forms and compiling the required documentation. People must be reached where they are located and in the languages they understand. We have the networks in place to do so. Furthermore, once awareness regarding these programs is increased, we will be relying on these same networks to assist people with applications. Together, we will collectively aid them in procuring all necessary documentation such as tax forms or other documents that prove income and residency. Lastly, we will be pushing for State and City legislation to require that landlords of rent-regulated apartments include clear information about New York City's Rent Freeze Programs in all new and renewal leases to ensure that all tenants are aware of these programs and how to apply.

Appendix table 1: SCRIE/DRIE Active Populations and HVS Eligibility Estimates by Sub-Borough

Borough	Sub-Borough	SCRIE/DRIE Enrollment (Summer 2014)				HVS Estimated Eligible Population			% of Eligible Households Enrolled
		Enrolled SCRIE (Non Mitchell Lama)	Enrolled (Mitchell Lama SCRIE)	Enrolled DRIE	Total Active (SCRIE + DRIE Enrolled)	SCRIE Eligible Population (HVS)	DRIE Eligible Population (HVS)	Eligible Population (HVS)	
Bronx	Mott Haven/Hunts Point	395	19	143	557	1198	999	2197	25%
Bronx	Morrisania/East Tremont	489	61	199	749	366	991	1357	55%
Bronx	Highbridge/S. Concourse	1267	211	337	1815	3747	1831	5578	33%
Bronx	University Heights/Fordham	1090	73	335	1498	1378	1628	3006	50%
Bronx	Kingsbridge Heights/ Moshulu	1078	49	290	1417	4151	1735	5886	24%
Bronx	Riverdale/Kingsbridge	790	200	179	1169	3521	238	3759	31%
Bronx	Soundview/Parkchester	927	134	189	1250	1618	840	2458	51%
Bronx	Throggs Neck/Co-op City	207	1015	150	1372	3698	1177	4875	28%
Bronx	Pelham Parkway	615	22	168	805	1350	434	1784	45%
Bronx	Williamsbridge/Baychester	319	54	61	434	156	528	684	63%
Brooklyn	Williamsburg/Greenpoint	634	216	150	1000	2756	759	3515	28%
Brooklyn	Brooklyn Heights/Fort Greene	383	82	77	542	1360	0	1360	40%
Brooklyn	Bedford Stuyvesant	199	2	60	261	1181	632	1813	14%
Brooklyn	Bushwick	375	2	178	555	827	195	1022	54%
Brooklyn	East New York/Starret City	149	15	33	197	594	550	1144	17%
Brooklyn	Park Slope/Carroll Gardens	343	4	97	444	453	219	672	66%
Brooklyn	Sunset Park	558	0	148	706	1108	521	1629	43%
Brooklyn	North Crown Heights/Prospect Heights	737	18	129	884	1107	1098	2205	40%
Brooklyn	South Crown Heights	1719	48	199	1966	2845	1107	3952	50%
Brooklyn	Bay Ridge	642	24	129	795	2516	777	3293	24%
Brooklyn	BensonHurst	1274	68	299	1641	2735	1007	3742	44%
Brooklyn	Borough Park	940	0	251	1191	1756	476	2232	53%
Brooklyn	Coney Island	995	440	232	1667	5097	1348	6445	26%
Brooklyn	Flatbush	2237	13	376	2626	4171	914	5085	52%
Brooklyn	Sheepshead Bay/Gravesend	1291	42	235	1568	2864	421	3285	48%
Brooklyn	Brownsville/Ocean Hill	126	73	78	277	1694	523	2217	12%
Brooklyn	East Flatbush	778	0	85	863	1483	954	2437	35%
Brooklyn	Flatlands/Canarsie	149	6	23	178	522	135	657	27%
Manhattan	Greenwich Village/Financial District	1081	71	104	1256	2824	157	2981	42%
Manhattan	Lower East Side/Chinatown	1618	234	245	2097	3961	568	4529	46%
Manhattan	Chelsea/Clinton/Midtown	1196	85	235	1516	2828	510	3338	45%
Manhattan	Stuyvesant Town/Turtle Bay	1308	9	105	1422	5144	360	5504	26%
Manhattan	Upper West Side	1793	79	179	2051	4145	161	4306	48%
Manhattan	Upper East Side	1391	43	129	1563	3750	212	3962	39%
Manhattan	Morningside Heights/Hamilton Heights	1437	56	272	1765	2442	530	2972	59%
Manhattan	Central Harlem	788	127	235	1150	1832	1240	3072	37%
Manhattan	East Harlem	322	178	110	610	2669	829	3498	17%
Manhattan	Washington Heights/Inwood	4928	468	1207	6603	6041	2833	8874	74%
Queens	Astoria	1234	5	148	1387	3233	410	3643	38%
Queens	Sunnyside/Wood	1203	43	112	1358	3373	922	4295	32%
Queens	Jackson Heights	1029	24	123	1176	1922	635	2557	46%
Queens	Elmhurst/Corona	1184	1	156	1341	2095	0	2095	64%
Queens	Middle Village/Ridgewood	415	0	87	502	1594	517	2111	24%
Queens	Forest Hills/Rego Park	1426	0	249	1675	3163	707	3870	43%
Queens	Flushing/Whitestone	1208	226	97	1531	3739	211	3950	39%
Queens	Hillcrest/Fresh Meadows	768	90	143	1001	2493	204	2697	37%
Queens	Kew Gardens/Woodhaven	351	1	71	423	2741	0	2741	15%
Queens	Howard Beach/S. Ozone Park	41	28	5	74	169	0	169	44%
Queens	Bayside/Little Neck	236	16	30	282	0	0	0	-
Queens	Jamaica	566	313	103	982	2650	198	2848	34%
Queens	Bellerose/Rosedale	161	0	12	173	206	0	206	84%
Queens	Rockaways	296	130	93	519	1669	0	1669	31%
Staten Island	North Shore	185	1	37	223	411	398	809	28%
Staten Island	Mid-Island	64	0	7	71	0	0	0	-
Staten Island	South Shore	117	0	24	141	384	0	384	37%

Appendix Table 2: SCRIE/DRIE HVS Fertility Estimates by Householder Birth Place and Sub-Borough

Borough	Sub-Borough	U.S. Born										Non-U.S. Born										Reported	Total			
		New York City	Other New York City	Other New York State	Dominican Republic	Other than Puerto Rican	Mexican	Central American	South America	Europe	Russia/Soviet Union	China	Hong Kong	Taiwan	India	Pakistan	Bangladesh	Philippines	Southeast Asia (Burma, Cambodia, Laos, Malaysia, Singapore, Thailand, Vietnam)	Other Asia	Africa			All Other countries		
Bronx	Mott Haven/Hunts Point	554	486	552	173	-	-	235	-	-	-	-	-	-	-	-	-	-	-	-	-	-	195	2,195		
Bronx	Morrisania/East Tremont	532	139	149	319	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	217	1,356		
Bronx	Highbridge/S. Concourse	1,293	849	1,398	565	218	-	-	-	-	-	-	-	-	-	-	-	-	218	-	-	-	1,038	5,579		
Bronx	University Heights/Fordham	995	193	838	345	-	233	399	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3,006		
Bronx	Kingsbridge Heights/ Moshola	1,185	-	1,100	787	193	-	431	560	-	-	-	-	183	-	-	-	-	-	-	-	-	-	1,443	5,887	
Bronx	Riverdale/Kingsbridge	2,084	693	-	238	238	-	-	-	-	-	-	-	-	-	-	-	-	169	-	-	-	-	337	3,759	
Bronx	Soundview/Parkchester	387	217	1,068	-	217	-	438	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	130	2,457	
Bronx	Throggs Neck/Co-op City	1,905	562	177	-	1,318	-	-	-	-	-	-	-	-	-	-	-	-	188	152	-	-	-	574	4,876	
Bronx	Pelham Parkway	699	204	-	-	-	169	-	248	-	-	-	-	-	-	-	-	-	-	-	-	-	-	472	1,782	
Bronx	Williamsbridge/Baychester	200	-	164	-	156	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	164	684	
Brooklyn	Williamsburg/Greenpoint	1,002	162	730	-	-	182	886	-	302	-	-	-	-	-	-	-	-	-	-	-	-	-	162	3,516	
Brooklyn	Brooklyn Heights/Fort Greene	671	594	184	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,359	
Brooklyn	Bedford Stuyvesant	822	627	170	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	194	1,813	
Brooklyn	Bushwick	-	388	-	439	-	-	195	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,022	
Brooklyn	East New York/Starret City	355	-	-	-	204	-	-	-	585	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,144	
Brooklyn	Park Slope/Carroll Gardens	235	-	436	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	671	
Brooklyn	Sunset Park	416	-	186	223	246	-	168	168	-	-	223	-	-	-	-	-	-	-	-	-	-	-	-	1,620	
Brooklyn	North Crown Heights/Prospect Heights	1,043	212	-	-	506	-	210	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	214	2,205	
Brooklyn	South Crown Heights	664	220	170	-	1,489	-	511	-	-	-	-	-	-	-	-	-	-	223	446	-	-	220	3,952		
Brooklyn	Bay Ridge	1,601	214	-	-	-	-	214	-	536	149	-	-	-	-	-	-	-	200	-	-	-	-	378	3,292	
Brooklyn	Bensonhurst	1,368	192	585	-	-	-	193	236	1,178	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3,742	
Brooklyn	Borough Park	253	-	-	-	-	-	228	496	936	-	-	-	-	-	-	-	-	-	253	-	-	-	157	2,233	
Brooklyn	Coney Island	1,430	580	-	-	177	-	168	975	2,238	-	-	-	-	-	-	-	-	277	-	-	-	-	599	6,444	
Brooklyn	Flatbush	1,206	384	534	-	1,122	-	142	415	990	-	-	-	142	-	-	-	142	-	-	-	-	-	-	5,087	
Brooklyn	Sheepshead Bay/Gravesend	1,058	-	-	-	-	-	169	508	1,141	-	-	-	-	-	-	-	-	214	-	-	-	-	196	3,286	
Brooklyn	Brownsville/Ocean Hill	193	594	415	185	395	-	145	-	-	-	-	-	-	-	-	145	-	-	-	-	-	-	145	2,217	
Brooklyn	East Flatbush	405	363	-	-	1,106	-	193	-	-	-	-	-	-	-	-	-	-	-	178	-	-	-	193	2,438	
Brooklyn	Flatlands/Canarsie	200	-	188	-	269	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	657	
Manhattan	Greenwich Village/Financial District	1,130	721	-	-	-	-	-	377	-	-	-	-	-	-	-	-	-	-	-	-	-	-	565	2,981	
Manhattan	Lower East Side/Chinatown	1,634	187	-	-	-	-	160	-	2,548	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,529	
Manhattan	Chelsea/Clinton/Midtown	1,093	510	340	-	-	-	340	351	208	170	-	-	-	-	-	-	-	-	-	-	-	-	327	3,339	
Manhattan	Stuyvesant Town/Turtle Bay	2,369	1,844	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,089	5,595
Manhattan	Upper West Side	1,865	1,088	209	-	209	-	-	379	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	554	4,304
Manhattan	Upper East Side	1,072	1,240	371	-	-	-	431	212	-	-	-	-	-	-	-	-	-	-	-	-	424	-	212	3,962	
Manhattan	Morningside Heights/Hamilton Heights	683	517	184	695	-	-	184	365	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	345	2,973
Manhattan	Central Harlem	1,250	1,045	-	-	361	-	-	-	-	-	-	-	-	-	-	-	-	-	239	-	-	-	176	3,072	
Manhattan	East Harlem	1,841	359	533	-	178	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	382	3,498
Manhattan	Washington Heights/Inwood	1,183	497	1,311	4,118	337	-	339	165	176	-	-	-	-	-	-	-	-	-	262	-	-	-	487	8,875	
Queens	Astoria	972	-	-	-	-	-	1,172	586	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	913	3,643
Queens	Sunnyside/Wood	778	618	-	-	212	-	670	1,290	-	-	212	-	-	-	-	-	-	-	-	-	-	-	-	513	4,293
Queens	Jackson Heights	445	-	-	-	-	-	1,455	267	-	-	-	-	-	-	-	164	-	-	-	-	-	-	-	227	2,556
Queens	Elmhurst/Corona	510	-	-	355	455	-	422	-	257	196	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,095
Queens	Middle Village/Ridgewood	619	-	554	373	-	-	229	-	-	-	-	-	187	-	-	-	-	-	-	-	-	-	-	149	2,111
Queens	Forest Hills/Rego Park	695	-	-	-	-	-	548	-	1,068	211	-	-	-	-	-	-	-	158	-	-	-	-	-	1,191	3,871
Queens	Flushing/Whitestone	587	-	-	211	-	-	686	183	534	648	583	-	-	-	-	-	-	-	214	-	-	-	-	425	3,951
Queens	Hillcrest/Fresh Meadows	712	227	327	-	-	-	-	-	656	-	-	-	-	204	-	-	-	-	-	-	204	-	-	367	2,697
Queens	Kew Gardens/Woodhaven	600	-	-	273	-	-	200	904	598	-	-	-	-	-	-	-	-	-	-	-	-	-	-	165	2,740
Queens	Howard Beach/S. Ozone Park	169	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	169
Queens	Bayside/Little Neck	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Queens	Jamaica	343	740	-	-	224	-	348	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,193	2,848
Queens	Belterose/Rosedale	-	-	-	-	-	-	206	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	206
Queens	Rockaways	533	188	231	-	-	-	-	-	334	-	-	-	-	-	-	-	-	-	-	-	-	-	-	383	1,669
Staten Island	North Shore	196	414	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	199	809
Staten Island	Mid-Island	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Staten Island	South Shore	384	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	384

**Appendix Table 3: ACS 2008 - 2012 Limited English Speaking Households (LESHH) by Sub-Borough**

Borough	Sub-Borough	Total Households and Percent of LESHH			LESHH Breakouts by Language Type			
		Total Households	LESHH Households	Percent LESHH	Spanish	Indo-European	Asian and Pacific Island	Other
Bronx	Mott Haven/Hunts Point	47,468	14,711	31.0%	95.1%	2.3%	0.7%	1.9%
Bronx	Morrisania/East Tremont	52,247	11,879	22.7%	88.8%	4.1%	1.7%	5.4%
Bronx	Highbridge/S. Concourse	46,849	12,230	26.1%	87.8%	5.1%	0.7%	6.4%
Bronx	University Heights/Fordham	42,497	10,432	24.5%	91.0%	3.0%	0.4%	5.7%
Bronx	Kingsbridge Heights/ Mosholu	43,044	9,910	23.0%	79.7%	13.0%	5.2%	2.2%
Bronx	Riverdale/Kingsbridge	40,997	4,918	12.0%	69.1%	17.9%	8.6%	4.5%
Bronx	Soundview/Parkchester	62,730	10,179	16.2%	88.3%	6.1%	3.4%	2.3%
Bronx	Throgs Neck/Co-op City	46,181	3,306	7.2%	58.5%	31.8%	6.9%	2.8%
Bronx	Pelham Parkway	44,207	5,840	13.2%	64.5%	25.5%	6.4%	3.6%
Bronx	Williamsbridge/Baychester	47,061	2,292	4.9%	73.3%	17.3%	3.8%	5.7%
Brooklyn	Williamsburg/Greenpoint	57,483	9,731	16.9%	47.6%	40.6%	10.0%	1.9%
Brooklyn	Brooklyn Heights/Fort Greene	53,060	3,247	6.1%	62.9%	10.9%	18.4%	7.9%
Brooklyn	Bedford Stuyvesant	48,585	3,423	7.0%	74.4%	17.3%	5.3%	3.0%
Brooklyn	Bushwick	43,049	12,618	29.3%	91.8%	2.6%	4.7%	0.9%
Brooklyn	East New York/Starret City	50,783	5,446	10.7%	68.1%	26.6%	3.8%	1.6%
Brooklyn	Park Slope/Carroll Gardens	48,696	2,968	6.1%	69.0%	19.5%	9.6%	2.0%
Brooklyn	Sunset Park	47,088	15,410	32.7%	44.4%	10.7%	43.8%	1.1%
Brooklyn	North Crown Heights/Prospect Heights	50,212	2,534	5.0%	42.3%	38.6%	9.4%	9.7%
Brooklyn	South Crown Heights	40,678	3,121	7.7%	33.8%	46.8%	7.8%	11.6%
Brooklyn	Bay Ridge	49,936	7,908	15.8%	15.3%	39.1%	35.2%	10.4%
Brooklyn	Bensonhurst	62,180	23,022	37.0%	13.7%	48.2%	35.7%	2.4%
Brooklyn	Borough Park	46,969	11,271	24.0%	20.6%	55.0%	16.5%	7.9%
Brooklyn	Coney Island	44,073	19,083	43.3%	11.8%	78.5%	8.0%	1.8%
Brooklyn	Flatbush	55,912	11,946	21.4%	20.1%	66.2%	10.0%	3.7%
Brooklyn	Sheepshead Bay/Gravesend	55,527	15,038	27.1%	7.1%	70.6%	15.4%	6.8%
Brooklyn	Brownsville/Ocean Hill	41,843	2,346	5.6%	81.4%	8.3%	4.3%	5.8%
Brooklyn	East Flatbush	48,494	2,468	5.1%	24.9%	67.2%	4.1%	3.8%
Brooklyn	Flatlands/Canarsie	67,407	5,236	7.8%	21.9%	63.5%	8.4%	6.1%
Manhattan	Greenwich Village/Financial District	74,910	3,620	4.8%	17.8%	14.9%	63.3%	4.1%
Manhattan	Lower East Side/Chinatown	70,629	16,000	22.7%	26.5%	6.4%	66.8%	0.3%
Manhattan	Chelsea/Clinton/Midtown	80,297	4,993	6.2%	42.7%	23.3%	32.6%	1.5%
Manhattan	Stuyvesant Town/Turtle Bay	80,625	3,855	4.8%	23.5%	30.2%	41.2%	5.1%
Manhattan	Upper West Side	99,110	4,647	4.7%	49.9%	25.6%	21.4%	3.4%
Manhattan	Upper East Side	115,879	4,636	4.0%	30.4%	32.8%	32.5%	4.3%
Manhattan	Morningside Heights/Hamilton Heights	46,974	6,853	14.6%	85.5%	4.4%	7.7%	2.4%
Manhattan	Central Harlem	51,709	3,706	7.2%	66.2%	20.7%	6.6%	6.5%
Manhattan	East Harlem	45,057	7,443	16.5%	83.5%	3.2%	12.0%	1.3%
Manhattan	Washington Heights/Inwood	72,941	18,654	25.6%	93.7%	4.5%	1.6%	0.2%
Queens	Astoria	73,052	11,925	16.3%	44.1%	36.5%	15.5%	4.0%
Queens	Sunnyside/Wood	51,049	12,780	25.0%	42.1%	19.8%	35.4%	2.6%
Queens	Jackson Heights	54,292	17,459	32.2%	76.4%	12.9%	10.3%	0.5%
Queens	Elmhurst/Corona	43,799	17,257	39.4%	52.0%	14.2%	32.8%	0.9%
Queens	Middle Village/Ridgewood	61,101	9,340	15.3%	36.6%	50.0%	10.1%	3.3%
Queens	Forest Hills/Rego Park	51,226	9,019	17.6%	12.6%	51.7%	29.5%	6.3%
Queens	Flushing/Whitestone	88,320	24,960	28.3%	12.1%	12.0%	75.5%	0.4%
Queens	Hillcrest/Fresh Meadows	54,712	7,806	14.3%	24.9%	32.2%	39.4%	3.5%
Queens	Kew Gardens/Woodhaven	44,733	6,073	13.6%	54.3%	29.8%	14.5%	1.4%
Queens	Howard Beach/S. Ozone Park	40,129	2,573	6.4%	61.6%	31.4%	6.0%	1.0%
Queens	Bayside/Little Neck	44,137	6,749	15.3%	8.0%	19.0%	71.9%	1.1%
Queens	Jamaica	69,211	6,660	9.6%	57.5%	31.8%	6.0%	4.7%
Queens	Bellerose/Rosedale	61,002	2,874	4.7%	25.3%	56.9%	16.9%	0.9%
Queens	Rockaways	39,548	4,428	11.2%	52.5%	41.6%	1.9%	4.0%
Staten Island	North Shore	60,522	4,824	8.0%	54.1%	19.7%	17.9%	8.2%
Staten Island	Mid-Island	46,456	3,713	8.0%	20.9%	47.9%	28.3%	3.0%
Staten Island	South Shore	56,697	1,853	3.3%	12.7%	67.0%	17.6%	2.8%

**Testimony of Cardozo Bet Tzedek Legal Services (“Bet Tzedek”),  
JASA/Legal Services for the Elderly in Queens (“LSEQ”), and  
Northern Manhattan Improvement Corporation (“NMIC”)  
to the  
Committees on Aging and Finance  
regarding  
Oversight - Update on the City’s efforts to conduct outreach and increase  
enrollment for the Rent Freeze Program  
December 9, 2015**

This testimony is submitted on behalf of Cardozo Bet Tzedek Legal Services (“Bet Tzedek”), Legal Services for the Elderly in Queens (“LSEQ”), and Northern Manhattan Improvement Corporation (“NMIC”), in connection with the Committees’ continuing oversight of the City’s efforts to increase enrollment in the Rent Freeze Program (RFP). Our offices provide free legal services and assistance to New York City’s low-income seniors and individuals with disabilities many of whom rely on SCRIE and DRIE benefits in order to remain in their homes and communities.

In its September 2015 report, the Department of Finance (“DOF”) set a goal of enrolling “every qualified household”<sup>1</sup> in the RFP. We cannot speak to the success or lack of success in DOF’s outreach to increase enrollment in the program. We can speak, however, to DOF’s policies and practices that deprive eligible individuals of RFP benefits because the individual is unable to meet an administrative deadline because of a mental or physical disability. We urge you to exercise your oversight authority so that while efforts are made to expand participation in the program, DOF is not -- at the same time -- terminating or denying benefits to eligible individuals who are legally entitled to an extension of time as an accommodation of the individual’s disability.

Your committees are well-aware of the importance of the RFP to enable elderly and disabled New Yorkers to retain housing that would otherwise be unaffordable. SCRIE and DRIE benefits are the resource that allows vulnerable elderly and tenants with disabilities from being displaced from homes and communities across our city.

The RFP provides assistance only to individuals who are elderly or disabled, precisely the population that can at some point in time, experience physical or mental disability making it difficult to meet an administrative deadline. This presents an extremely serious problem for those RFP-eligible individuals who miss a deadline such as the deadline for submitting a complete renewal application. Over the last few years, when an individual failed to file a timely renewal application, DOF did not inquire into the reason for missing the deadline—even when DOF was informed that the individual was blind or has Alzheimer’s disease. Instead, DOF informed the

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<sup>1</sup> *Report on the New York City Rent Freeze Program: Identifying and Enrolling Eligible Households*, NEW YORK CITY DEPARTMENT OF FINANCE, [http://www1.nyc.gov/assets/finance/downloads/pdf/scrie/scrie\\_drie\\_report.pdf](http://www1.nyc.gov/assets/finance/downloads/pdf/scrie/scrie_drie_report.pdf) (last visited Sept. 20, 2015).

individual that their only option was to file a new application for benefits. When they re-applied for the program, however, their new frozen rental payment often exceeded their limited, fixed monthly income. For example, in some cases rents rose from prior affordable frozen rents of approximately \$500 per month to rents of close to \$900 or much greater per month.

We have seen many cases where tenants have written to DOF seeking relief from a termination of RFP benefits, explaining in lay terms that they had serious medical conditions or chronic disabilities that had interfered with their ability to meet a deadline. In almost all cases, rather than ask for clarification or medical documentation, DOF simply denied the requests with the instruction that the individual file a new application for benefits, in complete disregard of the fact that the individual's rent was now unaffordable. After seeing many individuals with this same problem, Bet Tzedek and LSEQ, along with NMIC, filed a federal class action against DOF for failure to implement meaningful policies, practices and procedures in the RFP to provide reasonable accommodations for individuals who are unable to meet administrative deadlines due to their disabilities.<sup>2</sup>

DOF must bring its policies and practices into compliance with basic legal requirements such as those mandated by the Americans with Disabilities Act ("ADA") and the Due Process Clause. For many years, DOF's practice has been to deny requests for extensions of time either: 1) because the tenant didn't specifically request a "reasonable accommodation"; or 2) for the unstated reason that there was insufficient medical evidence, without providing any information about what additional medical evidence was required. For years, advocates have been asking DOF to change its policy for providing additional time as a reasonable accommodation under the ADA. Advocates have brought many individual Article 78 proceedings challenging the termination of RFP benefits to disabled individuals receiving RFP benefits when a disability has interfered with the individual's ability to comply with an administrative deadline. In some cases, DOF fought the Article 78 proceedings as being time barred. In most of the individual cases, DOF eventually agreed to provide the individuals with only prospective relief — requiring them to borrow money from family members or seek an emergency grant from HRA to pay the additional rent owed while the RFP benefits had been terminated.

Most significantly, it was not until we brought a class action lawsuit that DOF published a rule for providing extensions of time as a disability-related accommodation. The proposed rule had significant deficiencies and received extensive public comments. On Monday, December 7<sup>th</sup>, DOF published a final rule. While this rule represents a significant step forward, it has several deficiencies that may lead to a continuation of DOF's past unlawful practices. We outline the continuing deficiencies below:

Under the ADA, a public entity like DOF must modify its rules, policies and practices regarding administrative deadlines, when necessary to accommodate the needs of an individual with a disability, unless the modification would fundamentally alter the nature of the services, program or activity.<sup>3</sup>

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<sup>2</sup> *Pfeffer et. al. v. N.Y.C. Dep't. of Finance*, E.D.N.Y., Index No. 15 CV 3547.

<sup>3</sup> See 28 C.F.R. § 35.130(b)(7).

- The rule places the burden on the tenant or tenant representative to establish that the individual has a disability and that the disability “prevented” the individual from filing a timely renewal application.
  - The question of whether a person is “an individual with a disability” within the meaning of the ADA, should not be decided by applying a “demanding standard,” but should be determined in favor of a “broad scope of coverage.”<sup>4</sup> DOF must recognize that when seeking relief from the failure to meet a deadline, “an individual may use ‘plain English’ and need not mention the ADA or use the phrase ‘reasonable accommodation.’”<sup>5</sup> According to the Equal Employment Opportunity Commission (“EEOC”) and the U.S. Attorney General (“DOJ”) “[a]n impairment is a disability...if it substantially limits the ability of an individual to perform a major life activity, *as compared to most people in the general population. An impairment need not prevent, or significantly or severely restrict, the individual from performing a major life activity....*”<sup>6</sup> Thus the provision in the regulations that the disability *prevented* the tenant from meeting a deadline should be changed to state that “the disability made it difficult to meet the administrative deadline.” Such language would be much more consistent with the ADA requirements and would diminish the confusion that is likely to be caused by the proposed language.
  - DOF must be required to scrutinize every request for an extension of an administrative deadline to see if the individual may have a disability-related request for an extension. Court papers submitted by DOF in the *Pfeffer* litigation indicate that DOF looks for specific language in requests for an extension of time or relief from missing a deadline. In any case where an individual raises a health or medical condition in the context of a request for an extension of time, DOF must be required to make a reasonable inquiry to determine whether the individual may qualify for a disability-related accommodation.
- The rule requires that the individual have evidence from an “appropriate health care professional satisfactory to the Department” to establish disability and that the disability prevented the individual from meeting a deadline.
  - First, it is not clear that this standard would even cover a social worker or a family member who could attest to an obvious disability, as is permitted under the ADA.

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<sup>4</sup> 42 U.S.C. § 12101(b)(1) & (4); § 12102(4)(A)–(B).

<sup>5</sup> E.E.O.C., *Enforcement Guidance: Reasonable Accommodation and Undue Hardship Under the Americans with Disabilities Act, Requesting Reasonable Accommodation*, U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, <http://www.eeoc.gov/policy/docs/accommodation.html> (October 2002) (examples provided under Requesting Reasonable Accommodation question one).

<sup>6</sup> 29 C.F.R. § 1630.2(j)(1)(ii) (emphasis added).

- Second, this presents a serious concern in light of the high bar that DOF has set in the past for establishing a disability-related need for an accommodation. In most cases, the determination of whether an individual is substantially limited in the ability to perform a major life activity should “not require scientific, medical, or statistical analysis.”<sup>7</sup> Under the ADA, “[w]hen a disability and/or need for reasonable accommodation is not obvious or otherwise already known to the decision maker, the component may require that the individual provide **reasonable documentation** about the disability and functional limitations [demonstrating the need for an accommodation].”

When DOF deems an initial submission to be deficient, it must explain to the requesting individual why the documentation is insufficient and what information is needed.<sup>8</sup> It must then give the individual an opportunity to either submit any necessary additional medical evidence or authorize DOF to verify their disability. DOF has an obligation to assist the individual in obtaining medical information before denying a request for an accommodation based on the lack of sufficient medical evidence. It may be difficult for an individual with a cognitive, psycho-social or significant physical disability to obtain additional medical evidence without the agency’s assistance.

- The rule does not require that the agency provide legally adequate written notice of a denial of a request for an extension of time as a disability-based accommodation including providing notice of appeal rights;
  - The lack of a written notice violates the due process clause. DOF’s rule must require that the Agency notify the tenant, in writing, of DOF’s decision on the request for an extension of time, with the reasons for any denial and instructions for filing an appeal. Decisions granting an extension of time should also notify the tenant of any new administrative deadlines, such as a deadline for submitting a renewal application.
- The rule does not provide any deadline for deciding a request for an accommodation. Guidance from the U.S. Department of Justice suggests that the agency should issue a decision on a request for a reasonable accommodation in 7 business days from receipt of the request.<sup>9</sup> RFP-eligible tenants needing an extension of time to file a renewal application may be facing growing rent arrears due to the loss of their subsidy or may be defending an eviction proceeding for non-payment of rent, making the lack of a deadline for a DOF decision especially problematic and anxiety-producing. DOF should be

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<sup>7</sup> *Id.* § 1630.2(j)(1)(v).

<sup>8</sup> The Attorney General, *Memorandum for Heads of Department Components: Provision of Reasonable Accommodations*, U.S. DEPARTMENT OF JUSTICE MANUAL AND PROCEDURES FOR PROVIDING REASONABLE ACCOMMODATION, at Medical Documentation and Confidentiality, (October 2002), <http://www.justice.gov/jmd/eos/manual-and-procedures-providing-reasonable-accommodation> (emphasis added).

“The agency has a right to request supplemental medical information if the information submitted does not clearly explain the nature of the disability or the need for the reasonable accommodation.... Such a request for supplemental documentation must be specific so that the employee will know what to provide.”

<sup>9</sup> See Attorney General, *supra* note 15, at Timelines.

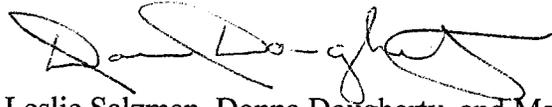
required to make a decision on a request for an extension of an administrative deadline within 7 business days of receipt of a completed request from a tenant or tenant representative.

- Although the rule allows for the designation of a representative to assist with submission of the renewal application, the rule should also allow a tenant to designate a representative to receive all agency notices. In addition, the appointment of the representative should remain in place unless and until the recipient asks that the representative be removed or changed. While the designation of a representative is not a foolproof protection, this important protection will diminish the number of individuals who miss a deadline, avoiding problems for the recipient and for the agency.
- DOF's proposed rule had called its disability-based accommodation an exception due to "Extraordinary Medical Circumstances." While the final rule correctly removed that language in the language of the rule because it suggested a standard that was significantly higher than that required under the ADA, DOF continues to use that language in the Rule's "Statement of Basis and Purpose," suggesting that it will continue to use an unlawfully high standard for establishing the right to a reasonable accommodation. The City Council must ensure that this does not happen.
- DOF must be required to train all relevant staff members, including 311 routers, walk-in center staff and any other staff member who might receive an inquiry about an administrative deadline, so that these employees can properly inform applicants and recipients of the policy regarding the right to request an extension of an administrative deadline as a disability related accommodation. In addition, the agency's reasonable accommodation coordinator(s)/liaison(s) must have appropriate expertise in processing and deciding requests for reasonable accommodations
- DOF must provide RFP applicants and recipients with reasonable notice of this policy to provide disability-related accommodations. DOF should be required to:
  - Prominently feature on the DOF website, in the Frequently Asked Questions section of the website, and in the RFP tenant handbook and other RFP brochures, a plain language explanation of the ability to get a reasonable accommodation in the RFP program, including an extension of an administrative deadline. These should be readily available in languages other than English;
  - Include a plain language explanation of the reasonable accommodations policy to the end of all renewal applications and DOF notices of rejections of late submissions to the agency. **In addition, the City Council should consider adding a notation about DOF's reasonable accommodation policy, including the right to request an extension of a deadline, to the contents of the notice in Section 11-138.**

Consistent with the Rent Freeze law's purpose, any rules and DOF policies and practices should ensure that individuals who are eligible for the SCRIE and DRIE programs and whose disabilities may make it difficult to comply with deadlines, do not lose their benefits—and their homes—*because* of their disability. We urge the City Council to do all that it can to strengthen DOF's administration of the RFP program to support the RFP goal of preserving affordable housing for low-income seniors and individuals with disabilities. Without these benefits, many City residents would be unable to remain in their apartments, forcing many into institutional settings or homeless shelters. This type of displacement would lead to dramatic financial and personal costs, both to the City and the tenant. We believe that the actions outlined above are needed to bring this new DOF policy into conformity with the ADA and Due Process.

We would be happy to respond to any further comments or questions regarding this letter and our views on the proposal more generally. Our phone number is 212-790-0240.

Respectfully,



Leslie Salzman, Donna Dougherty, and Matthew Chachere

Submitted on behalf of the following organizations:

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Delsenia Glover, Rent Regulation Lead Organizer

New York State Tenants & Neighbors

*Testimony as Prepared*

December 9, 2015

New York City Council Committee on Finance jointly with the Committee on Aging

**Re: Intro 798-A**

Good morning. Thank you to Chair Ferreras-Copeland and the Committee on Finance with the Committee on Aging for the opportunity to testify today.

My name is Delsenia Glover and I am the Rent Regulation Lead Organizer for New York State Tenants & Neighbors Information Service and New York State Tenants & Neighbors Coalition, two affiliate organizations that share a common mission: to build a powerful and unified statewide organization that empowers and educates tenants; preserves affordable housing, livable neighborhoods, and diverse communities; and strengthen tenant protections. The Information Service organizes tenants in at-risk rent regulated and subsidized buildings, and helps them preserve their homes as affordable, and organizes administrative reform campaigns. The Coalition is a 501c4 membership organization that does legislative organizing to address the underlying causes of loss of affordability. Our membership organization has over 3,000 dues-paying members.

Tenants & Neighbors organizes in rent-regulated, Mitchell-Lama, and project-based Section 8 developments citywide. In the buildings where we organize, the story is the same. Low and moderate income tenants in New York City are regularly experiencing the pressures of displacement. Rents are climbing and tenants are concerned that they will not be able to afford to stay in their homes and communities. For preferential rent tenants, this is a particularly fearsome situation. For one, many tenants do not know what it really means to be a preferential rent tenant until the landlord decides to raise the rent to the so-called legal regulated rent where, in some cases, previous increases have been in accordance with the Rent Guidelines Board.

Last week, I sat in a room with preferential rent tenants whose landlord is this year increasing all rents far above the RGB increases, many to the legal regulated rent which may be hundreds of dollars above the preferential rent. And some of those tenants are over 62 years old, in some cases retired on fixed incomes. And when you look at rent histories it is clear that some of these so-called legal regulated rents must be illegal, because the jumps between leases are too high to be plausible. This year in particular is

significant, because the rent laws were renewed this past June and nothing moved on preferential rent legislation with the exception of a minor fix that has nothing to do with those currently living in those apartments.

Preferential rents have risen to the level of more than 27 percent of the city's rent regulated housing – hundreds of thousands of units. If we do not pay careful attention to first, how landlords increase legal regulated rents and if they are legal; and second, make landlords explain in specific language what a preferential rent means for new tenants, landlords will have free reign to perpetuate this practice of bait and switch, and older tenants will continue to find themselves in an untenable situation. For the first half of this year, Tenants & Neighbors and our allies in the tenant movement lobbied to change laws in Albany to repeal vacancy deregulation and close loopholes that create the affordability crisis in rent regulated housing. Our platform included a bill that would have made the preferential rent the legal rent for the life of the tenancy, and increases would have been an average of Rent Guidelines Board increases. It did not pass the state Senate unfortunately. So we are here to stand in support of Intro. 798-A to require the Department of Finance to be sure tenants are properly informed of what a preferential lease means, that the leases are legally worded, and that the department begin tracking data on preferential rents immediately.

Thank you very much for the opportunity to testify today.



New York City Council Aging & Finance Committees  
December 9, 2015

Good morning. I'd like to thank the New York City Council Aging and Finance Committees for hosting today's hearing. JASA welcomes the opportunity to comment on Intro No.798-A regarding the Senior Citizen Rent Increase Exemption (SCRIE) and Disability Rent Increase Exemption (DRIE).

JASA is a not-for-profit agency serving the needs of older adults in the greater New York area. JASA programming promotes independence, safety, wellness, community participation, and an enhanced quality of life for New York City's older adults. These programs reach over 43,000 clients and include home care, case management services, senior centers, NORC supportive services, home delivered meals, caregiver support, continuing education, licensed mental health, housing, advocacy, legal services, adult protective services, and guardianship services.

The Senior Citizen Rent Increase Exemption ("SCRIE") and Disability Rent Increase Exemption ("DRIE") Programs were created by New York State enabling legislation, and adopted in New York City, to ameliorate the effects of ever-increasing rents and thereby to prevent the eviction of elderly and disabled tenants from their homes in our communities. For eligible tenants living in Rent Controlled, Rent Stabilized, Mitchell-Lama and certain other rent-regulated apartments, the SCRIE and DRIE Programs "freeze" the tenants' rent payments and provide landlords with a dollar-for-dollar tax abatement to cover specified legal rent increases.

Eligibility requirements consist of (1) a head of household who is either age 62 or over (for the SCRIE Program) or disabled (for the DRIE Program); (2) income within the specified maximum income limit (for the SCRIE Program, a total household income of no more than \$50,000 per year; for the DRIE Program, \$20,412 per year for a household of one person and \$29,484 per year for a household of two or more persons); and (3) a rent payment which is more than one-third of household income. For many tenants in these programs, the SCRIE or DRIE benefit is a critical factor that allows them to maintain their long-term, affordable apartments and preserve their independence and autonomy.

JASA supports Intro 798-A, which would provide tenants with much needed clarity on their SCRIE/DRIE benefit. The administrative code would be amended to include information on their rent status, whether they have "preferential rent" or "registered rent", and how their benefit was calculated. This information would also be readily available at the Department of Finance, in case there are complaints of rent overcharge, or other issues which arise. The current system is often confusing for tenants who have preferred rent, but apply for SCRIE, and find out it was based on the registered rent for the apartment. The resulting rent leaves the tenant paying a higher rate, and leaves them financially vulnerable.

JASA would like the Council to consider further amendments to the current income eligibility by: (1) expanding the list of types of income that are excluded from the definition of income; (2) adding to the list of allowable deductions, specifically by allowing a deduction for health-related expenses; and (3) allowing program participants whose benefits are terminated due to receipt of extra countable income that puts them over the income limit in a given year to have their prior "frozen" share of the rent reinstated in the future upon reapplication if income drops below the income cap.

Currently, the only specific exclusions from the statutory definition of income are gifts, inheritances, Nazi victim reparations and, to a limited extent, certain cost-of-living increases in retirement benefits. The only deductions that are permitted are for payment of taxes and child support. There are no deductions for health-related expenses such as the Medicare Part B premium, other health insurance premiums or out-of-pocket medical costs. There is no asset or resource limits for the SCRIE Program. While interest earned on assets such as savings or brokerage accounts constitutes income, a withdrawal from such an account does not.

As it stands now, the current Income definitions cause irreparable harm to certain seniors, some of whom may have been in the program for many years, when they are terminated due to excess income after receiving one of the types of lump-sum income described above. Upon such termination, they are advised that they can reapply in the future if their income drops to below \$50,000 again. However, upon such reapplication they are not entitled to have their previous "frozen" share of the rent reinstated but instead are treated like a new applicant whose rent is frozen at current legal Rent Controlled or Rent Stabilized rates, which often have risen beyond the senior's means.

Finally, there are many eligible tenants who are unaware of the SCRIE/DRIE programs. Clearly, there is need for a vigorous public awareness campaign, and much greater outreach. Often seniors apply for the program later than when they were first eligible, and as a result, their rent is frozen at a higher rate. Perhaps the City should require landlords to include a notice about SCRIE and DRIE when they send out the required lease and rent renewal offers to tenants. This would ensure that all residents are aware of the program and have an opportunity to apply in a timely fashion.

Thank you for the opportunity to offer this testimony today and please let us know if we can be of further assistance on this subject.

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## **Disabled In Action of Metropolitan New York, Inc.**

POB 30954, Port Authority Station, New York, NY 10011-0109

### **Committees on Finance & Aging:**

#### **Update on the City's efforts to conduct outreach & increase enrollment for Rent Freeze (SCRIE & DRIE)**

**December 9<sup>th</sup>, 2015**

My name is Edith Prentiss; I am President of the 504 Democratic Club, Vice President for Legislative Affairs of Disabled in Action of Metropolitan New York (DIA), Chair of the Taxis For All Campaign (TFAC), and a member of the Disabilities Network of New York City (DNNYC) Board.

It is important to acknowledge the differences between the SCRIE & DRIE populations. Finance's Report on the NYC Rent Freeze Program: Identifying and Enrolling Eligible Households recaps the programs history. SCRIE established in 1970 for rent controlled and stabilized apts, expanded in 1976 to add Mitchell-Lama. DRIE established in 2005. The average SCRIE participant has been in the program 9.1 years is 76.5 years with 1.4 people in the house and an income of \$16,504. The average DRIE participant has been in the program for 4.4 years with 1.2 people in the household is 58 years and income of \$13,516. The report acknowledges the lag in the establishment of DRIE and even further the income disparity but fails to confront the impact of those for the disability community.

Just reading the SCRIE and DRIE eligibility information is not equitable. SCRIE is straight forward: age, income, rent greater than 1/3 of income, eligible unit, not have Section 8 voucher. But DRIE adds source of income: Social Security or Railroad retirements, SSI, TANF income from non SSA retirement, survivor or disability pensions. Okay and where is a DRIE applicant supposed to get assistance to apply?

When C. Virginia Fields was Manhattan Borough President she proposed medical expenses be included in the budget. For disabled applicants who unlike seniors are not protected from the ravages of the M Medicare Part D Doughnut Hole, it might be a greater incentive than freezing their rent after all the years we were ineligible.

It seems as if rent freeze still thinks it is SCRIE. If you Google Rent Freeze, one page that comes up ([www1.nyc.gov](http://www1.nyc.gov)) acknowledges people with disabilities but the photos are of 4 diverse seniors. It seems as if someone scanned the text and simply added people with disabilities and DRIE. The DRIE poster with Luda & Dustin might lead people to believe it is only for wheelchair users.

Senior centers and DFTA funded Programs are a major part of SCRIE outreach but it is important to acknowledge the disability community does not have a specific service base. Yes there are 5 Independent Living Centers (federally and state not city funded) and many programs serving silo populations but most participants live with their families or in congregant

settings. Information about the existence of DRIE and how to apply are often available in politician offices, libraries but many remain inaccessible! Politicians, Community Boards and local non-profits sponsor Senior Resource Fairs have you ever seen a PWD Resource Fair (other than those hosted by Silos, the annual Abilities Expo in New Jersey and the Summer Camp fair)?

There are numerous City program PSA on the subways why not Rent Freeze (with a diverse senior and PWD pix)? I had hoped we could incorporate a resource fair including Ballot Marking Device demonstrations as part of the Disability Pride ADA 25<sup>th</sup> Anniversary Event in July but it was too unwieldy.

Hopefully in the future we can arrange a Disability Resource Fair (similar to the DFTA's annual event) to include all disabled New Yorkers and encourage politicians to do the same.

Thank you for the opportunity to testify.



MORE THAN FOUR DECADES OF SERVICE

**MET COUNCIL**

ACTS OF CHARITY • DEEDS OF KINDNESS • צדקה וגמילות חסדים

**New York City Council Oversight Hearing:  
Update on the City's Efforts to Conduct Outreach and Increase Enrollment for the Rent  
Freeze Program  
December 9, 2015  
City Hall, New York, NY 10007.**

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Thank you, Committee Chairs Ferreras and Chin and the committees for inviting us to speak today.

My name is Rena Resnick and I am the Public Affairs Manager at Metropolitan Council on Jewish Poverty.

We applaud the City Council for its efforts to increase transparency and accessibility for Rent Freeze program and support Councilman Cornegy's Intro. 798-A.

For more than four decades, Met Council has supported and championed families, seniors and adults living in poverty and near-poverty. Met Council provides immediate assistance to New Yorkers in crisis and creates pathways to self sufficiency through the following programs: America's largest kosher food pantry system, emergency social services, family violence services, home repairs, benefits enrollment and outreach, and affordable housing. Our grassroots Jewish Community Council network provides support to families in their neighborhoods—right where they live.

We leverage government contracts with privately raised funds from individuals and foundations to increase the impact of our services.

Since Met Council's inception, caring for seniors has been core to Met Council's mission. Many of our clients work their entire lives, but when they become too frail to work, their lack of a deep and wide enough safety net makes it difficult for them to remain safely in the homes that they love.

To address these needs, Met Council created its first geriatric services manager to coordinate all our services offered to seniors to ensure that they are the most effective, efficient and compassionate. In addition, with three in five eligible seniors not enrolled into SNAP, Met Council was awarded a private grant from National Council on Aging to hire a case worker to conduct outreach and screen older adults for SNAP benefits.

To ensure that this vulnerable population is served with dignity and is educated on all services they are entitled to, we work diligently in our outreach efforts.

During a time when tailored outreach is increasingly relying on social media and email, we have found that reaching the senior immigrant population requires a different approach.

In order to connect with seniors and help inform and enroll them into available benefits, we have utilized a few simple, but critical tools, including: traveling to the neighborhoods where seniors live, creating initial pre-screening questions in clients' native languages, home visits for frail or homebound seniors, utilizing volunteers and creating comprehensive follow up plans.

Last summer, when the City Council and Administration increased the income qualification for SCRIE, Met Council held four SCRIE Enroll-a-Thons during the month of August in order to assist clients with enrollment into the program and avoid future rent increases. Many of these clients were newly eligible for the benefit. We held these events at our senior affordable housing buildings in Manhattan. In coordination with the City's Department of Finance, our housing site staff and volunteers, we were able to enroll 70 seniors into the program by bringing the application to them and by creating a document checklist in both English and Russian.

This summer, we received many calls from clients who found re-enrolling challenging. We referred clients to Department of Finance for assistance. When issues of re-enrollment arise with other benefits, such as SNAP or Medicaid, our staff is both funded and trained to assist clients.

We believe that if there were funding available for service providers to facilitate outreach and enrollment for Rent Freeze, similar to the system available under the Human Resources Administration to increase access to SNAP, additional seniors will participate in Rent Freeze.

In conclusion, Met Council could not continue providing critical social services to thousands of needy New Yorkers each year without the vital partnership of New York City Council. We deeply value your leadership and partnership and look forward to working together to help the needy throughout the New York area.

Thank you. I would be happy to take any questions you have at this time.



**FOR THE RECORD**

**ANHD**  
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Tel: (212) 747-1117

**TESTIMONY OF Emily Goldstein, BEFORE  
THE NEW YORK CITY COUNCIL COMMITTEE ON FINANCE CONCERNING INTRO  
0798-2015**

December 9, 2015

Good Afternoon. Thank you Chairwoman Ferreras and to the members of the Committee on Finance for the opportunity to testify.

My name is Emily Goldstein and I am the Senior Campaign Organizer for the Association for Neighborhood and Housing Development (ANHD). ANHD is a membership organization of NYC- neighborhood based housing and economic development groups- CDCs, affordable housing developers, supportive housing providers, community organizers, and economic development service providers. Our mission is to ensure flourishing neighborhoods and decent, affordable housing for all New Yorkers. We have nearly 100 members throughout the five boroughs who have developed over 100,000 units of affordable housing in the past 25 years alone and directly operate over 30,000 units.

I am here today to testify in support of Intro 0798, requiring the Department of Finance to include a notification regarding preferential rent on documents related to the SCRIE and DRIE programs.

The affordable housing crisis in New York City has reached its most severe level in decades as housing in New York City has grown increasingly unaffordable to many residents and families. The 2014 and 2011 Housing Vacancy Survey found that over half of all New York City renters were rent-burdened, paying more than 30% of their household income in rent. While almost a third of New York's renters were severely rent-burdened, paying more than 50% of their household income in rent.

The tenant movement celebrated in June when the Rent Guidelines Board passed a historic rent freeze for New York City's million-plus rent stabilized households. Rent Stabilization is one of the most important sources of affordable housing left in New York City. And the SCRIE and DRIE programs play a critical role, freezing rents for thousands of low-income New Yorkers, primarily in rent stabilized housing. Unfortunately, due to the loophole of preferential rents, not every rent stabilized tenant is enjoying the benefits of the rent freeze passed last June.

Even when done legally, preferential rents are confusing and tend to threaten rent stabilized tenants' ability to stay in their homes with the ever-present possibility of drastic rent increases at every lease renewal, regardless of the limits put in place by the rent guidelines board. And because they are generally not well understood, preferential rents are easily abused by unscrupulous landlords looking to drive out long-term tenants and deregulate rent stabilized housing.



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The proposed legislation would help to ensure that a particularly vulnerable set of rent stabilized tenants is armed with accurate information about their rights, and is a valuable step to shed light on the problem of preferential rents – a loophole we hope will be closed at the state level.



**David R. Jones, Esq.**  
President & Chief Executive Officer

**Steven L. Krause**  
Executive Vice President &  
Chief Operating Officer

**Community Service Society of New York**  
**Testimony before**  
**New York City Council Committees on Aging and Finance**  
**December 9, 2015**

Good afternoon Chairperson Chin, Chairperson Ferreras-Copeland, and members of the NYC Council Committee on Aging and the Committee on Finance. My name is Rebecca Haase and I am the Program Director of the Community Service Society's (CSS) Financial Advocacy Program. Thank you for the opportunity to provide testimony on the City's efforts to conduct outreach and increase enrollment for the NYC Rent Freeze Program.

CSS is a 170 year-old organization that seeks to address the root causes of economic disparity. Our mission is to promote policies and create programs that advance the economic security of low- and moderate-income New Yorkers. CSS has been a leader in providing public benefit counseling to seniors and individuals with low-incomes on a full range of benefits including Medicaid, Medicare, SNAP, SSI, SSDI, Cash Assistance, Access-a-Ride, HEAP, SCRIE, DRIE and many others since 1984.

Through the Financial Advocacy Program, we train older adult volunteers to provide public benefit counseling and financial coaching. The program places volunteers in agencies throughout NYC where they work one-on-one with clients in senior centers, work-force development agencies, hospitals and other community-based organizations. The project has 90 volunteers who assist approximately 5,000 new clients each year. This year, we received a grant from The New York Community Trust to conduct outreach specifically on SCRIE and DRIE (now known as the NYC Rent Freeze Program) through our Rent Freeze Outreach Project.

The project's goal is to increase enrollment among the growing population of individuals who qualify for the benefit.

The Rent Freeze Outreach Project has a unique approach as its primary goal is application assistance. Our outreach is focused on screening potential applicants for eligibility and helping them fill out applications for the program. We strive to educate potential applicants about the eligibility criteria and documents needed to apply before they attend one of our outreach events. Potential applicants come prepared, for the most part, with the proper documentation. This structure enables us to fully assist the applicant with the application process. While we do participate in some events where the focus is giving out information, we feel our time is better spent on providing application assistance. We conduct events in community centers, senior centers, libraries, religious institutions, as well as other non-profit organizations.

Our project works closely with and in support of both the Department of Finance (DOF) and Housing, Preservation and Development (HPD). We have met with both city agencies to review eligibility rules and the application process. We have conducted several outreach events in partnership with the Department of Finance. In addition, HPD keeps us updated on the Mitchell-Lama buildings that are having an increase. This allows us to assist seniors in those buildings with applications. We are currently working with Franklin Plaza, a Mitchell-Lama building in the East Harlem area, as they are about to have an increase next year.

We want to thank the DOF for their outreach efforts. They have created a useful website and an excellent guide which is written in an easy to understand format. The name change and new attractive materials have made a difference. The SCRIE Ombudsman, Weekly Tenant and Applicant Reports, SCRIE calculator and forms accessible online have made getting help and information easier. We use their materials daily in our work with clients.

We have also met with and work with various elected officials on joint events or attended events they are holding. In addition, we worked with AARP on a targeted postcard mailing to educate AARP members about the NYC Rent Freeze Program. AARP members were invited to attend one of three outreach events we held in areas of low-enrollment in Manhattan, Brooklyn and the Bronx. Through these efforts we have received over 200 phone calls.

In a recent report conducted by the Department of Finance there are 94,000 potential applicants not enrolled in the NYC Rent Freeze Program. Based on our outreach experience, we feel that to reach this eligible population there are many challenges that need to be overcome.

One of the main challenges has to do with issues related to housing concerns and issues with landlords. Potential applicants are often worried about how applying for SCRIE/DRIE will affect their relationship with their landlord. Some applicants do not have their prior lease or they have not received the current lease signed by the landlord both of which are needed for the initial application. All of these issues and concerns preclude eligible people from applying. If landlords are required to share information about the Rent Freeze Program to all their tenants once a year this would help spread the word to the right audience and help alleviate the fear people have of upsetting their landlord. The message of the program would be coming from the landlord and all New Yorkers in rent regulated apartments would be familiar with the program.

Another challenge is getting the message out on a larger scale to those who may be unfamiliar with the program. We feel this could only be accomplished through working with other government agencies and institutions, and through a larger scale marketing campaign. If seniors hear the message from trusted institutions or through NYC sponsored media campaign they would feel that they are entitled to the program and less fearful of applying. In addition, the work of community based organizations who have ties with the community and seniors is one of the best ways to assist seniors and conduct outreach.

Therefore, CSS supports the City Council in your effort to pass legislation that would increase outreach and enrollment in this valuable program for seniors and people with disabilities.

***Recommendations:***

- Distribute NYC Rent Freeze Program information and eligibility guidelines to all New Yorkers living in rent regulated buildings either through landlords or agencies such as Division of Housing and Community Renewal (DHCR).
- Require that NYC employers share information on the NYC Rent Freeze Program with their retirees through their Human Resources (HR) Departments.
- Work with the local Social Security Administration offices on distributing information on the program to applicants for retirement and disability benefits.
- Work closely with non-profits that are doing outreach on the Rent Freeze Program to find out what works best and to develop best practices in assisting seniors and doing outreach. Invest City resources in programs like the CSS Rent Freeze Outreach Project and other similar programs which are solely dedicated to finding and assisting potentially eligible seniors.
- Conduct a large-scale media campaign with information posted in subways, on buses and through television advertisements

Thank you for the opportunity to present testimony before these Committees.

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**New York City Council  
Committee on Finance  
The Honorable Chair Julissa Ferreras-Copeland, Chair  
Hearing on Intro. 798-2015  
December 9, 2015**

LiveOn NY thanks Council Member Julissa Ferreras-Copeland, Chair, Committee on Finance, for holding a hearing on this important bill. LiveOn NY also thanks Council Member Robert E. Cornegy, Jr. and cosponsors of Intro. 798-2015 for their leadership on this bill aimed to strengthen the Senior Citizen Rent Increase Exemption (SCRIE) program and to educate older adults about benefits of the SCRIE program.

According to the NYC Center for Economic Opportunity, 1 in 3 New Yorkers over the age of 65 live in poverty and 2 in every 3 people over 70 pay more than 30% of their income in rent. Nearly 100,000 seniors experience extreme rent burden, meaning they pay over 50% of their income in rent.

The ability of older adults, frequently the anchors to stable communities and families, to remain in their homes is at substantial risk in neighborhoods of all socioeconomic levels across the city. The population of older adults living with financial insecurity is growing. Because income for older adults remains fixed, or worse, declines, many adults live on a fiscal cliff in a city that already has an extreme need for affordable housing options.

Given the alarming rent burden our city's older adults face, and the shortage of available affordable senior housing units, the SCRIE program is crucial in protecting the ability of older adults to remain in their homes. The program should be strengthened and publicized whenever possible, particularly with its high underutilization rate.

**Intro. 798-2015**

LiveOn NY regularly sees the challenges older adults face through its work on the LiveOn NY Older Adult Benefit Outreach Initiative. This innovative and unique program places friendly, knowledgeable volunteers and carefully selected, highly-trained retired professionals within low-income, high-needs communities to educate thousands of older adults, including those who are homebound, about benefits including SCRIE. LiveOn NY assists the applicants at each step through the application and enrollment process.

However, it has become apparent that there is a great deal of confusion about SCRIE benefits, particularly when the applicant is receiving a preferential rent. LiveOn NY's outreach team has reported that this issue of preferential rents has been occurring frequently with applicants.

This confusion about preferential rents has caused benefits enrollment specialists and applicants to work tirelessly to follow rules and gather documentation, only in the end to find out that this rent type precludes the full protection of SCRIE. The applicant, who initially thought SCRIE would freeze their rent and protect their home is left confused as to why the program cannot

adequately protect them. This is further compounded by the fact that the Department of Finance (DOF) does not provide any information to the applicant or specialist to help them understand their options and what a preferential rent means for their current lease and for protecting their future.

Because of the nuances of preferential rents, many clients are unclear that they even have this rent type when they begin the application process. It is not until much later that those assisting the seniors, and even the seniors themselves, find out their rent is "preferential."

Intro. 798-2015 could go a long way in beginning the education process for older adults in that it requires Department of Finance (DOF) to provide educational information directly to the applicant about how a preferential rent affects the applicant's application. It would allow the applicant, and any specialist assisting them, make more informed decisions about the SCRIE program. This would also save time, confusion and delay on the re-application process. Intro. 798 would also educate the tenant on how to obtain their rent history so they are fully informed of the rent structure.

Further, Intro. 798-2015 could also help prevent a great deal of confusion and delay by requiring DOF to begin tracking which applicants and re-applicants are receiving preferential rents so that this issue does not cause confusion and delay year after year.

### **LiveOn NY Urges the City to Support an Aggressive SCRIE Public Awareness, Outreach and Enrollment Campaign**

This confusing issue of preferential rents is again a reminder that a public awareness and outreach campaign is needed to strengthen the SCRIE program. There is a tremendous leadership opportunity for City Council to reach upwards of 70,000 eligible but unenrolled older adult households to help build a wall of protection around seniors to remain in their homes. As noted in the *Freeze Your Rent* Report, DOF's goal is to better focus outreach efforts to reach every qualifying tenant to increase the low utilization rate, and fostering community partnerships is a key component of that goal. This will take funding and a strategic plan, and a good comparison is the success of the city's current well-orchestrated Pre-K public awareness campaign.

LiveOn NY supports these efforts to strengthen the SCRIE program, and thanks City Council for their leadership on this issue.

*About LiveOn NY:* LiveOn NY is dedicated to making New York a better place to age. Founded in 1979, with a membership base of more than 100 organizations ranging from individual community-based centers to large multi-service organizations, LiveOn NY is recognized as a leader in aging. LiveOn NY's membership serves over 300,000 older New Yorkers annually and is comprised of organizations providing an array of community based services including elder abuse prevention and victims' services, case management for homebound seniors, multi-service senior centers, congregate and home-delivered meals, affordable senior housing with services, transportation, NORCs and other services intended to support older New Yorkers. LiveOn NY connects resources, advocates for positive change, and builds, supports and fosters innovation. Our goal is to help all New Yorkers age with confidence, grace and vitality.

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. T 2015-3815 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 12/19/15

(PLEASE PRINT)

Name: Matthew Chachere

Address: 45 Wadsworth Ave, NY, NY 10033

I represent: Northern Manhattan Improvement Corp.

Address: \_\_\_\_\_

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. T 2015-3615 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 12/9/15

(PLEASE PRINT)

Name: Donna Dougherty

Address: JASA / Legal Services for the Elderly in Queens

I represent: 97-77 Queens Blvd, Suite 600, Rego Park NY

Address: \_\_\_\_\_ 11374

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Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: 12/9/15

(PLEASE PRINT)

Name: Molly Krakowski

Address: \_\_\_\_\_

I represent: JASA

Address: \_\_\_\_\_

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Date: \_\_\_\_\_

Name: Reva Resnick (PLEASE PRINT)

Address: \_\_\_\_\_

I represent: Metropolitan Council on Jewish

Address: 120 Broadway Poverty

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in favor  in opposition

Date: \_\_\_\_\_

Name: Rebecca Haase (PLEASE PRINT)

Address: 633 Third Ave 10017

I represent: Community Service Society

Address: \_\_\_\_\_

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THE CITY OF NEW YORK**

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in favor  in opposition

Date: \_\_\_\_\_

Name: Edith Prentiss (PLEASE PRINT)

Address: 739

I represent: DIA Metro NY

Address: 739 W 186 St NYC 10033

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I intend to appear and speak on Int. No. 0798 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 12/19/15

(PLEASE PRINT)

Name: Emily Goldstein

Address: \_\_\_\_\_

I represent: ANHD

Address: 50 Broad St, 14th Fl

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Appearance Card

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in favor  in opposition

Date: \_\_\_\_\_

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Name: Debenia Glover

Address: \_\_\_\_\_

I represent: Tenant & Neighbors

Address: \_\_\_\_\_

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THE CITY OF NEW YORK**

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Date: \_\_\_\_\_

(PLEASE PRINT)

Name: SUE YELIN

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 798 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 12/9/15

(PLEASE PRINT)

Name: Saman

Address: NYC Department of Finance

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

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Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Pierre Dejean

Address: NYC Dept of Finance

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

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Appearance Card

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in favor  in opposition

Date: 12.9.15

(PLEASE PRINT)

Name: Caryn Resnick

Address: Deputy Commissioner, External Affairs

I represent: DFTA

Address: \_\_\_\_\_

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in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Bibi Parmar

Address: NYC Dept of Finance

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

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