



Human Resources
Administration
Department of
Homeless Services

**Testimony of Steven Banks, Commissioner
New York City Department of Social Services**

**Before the New York City Council General Welfare Committee
Oversight: PATH to Permanency
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Good morning, Chairman Levin and members of the General Welfare Committee. Thank you for inviting us to appear before you today to discuss the services and the reforms we have implemented to improve the transition from PATH back to housing in the community. My name is Steven Banks and I am the Commissioner of the Department of Social Services (DSS), overseeing the Human Resources Administration (HRA) and Department of Homeless Services (DHS).

Recognizing the growing challenges of homelessness faced by many New York City families, over the past three years, this Administration has implemented and expanded initiatives in order to prevent and alleviate homelessness, including reinstating rental assistance programs and other permanent housing initiatives that have enabled 62,158 individuals in 22,686 households to avert entry into or move out of shelter, through May 2017.

The Administration has made unprecedented investments to address homelessness and the economic insecurity felt by low-income New Yorkers, many of whom rely on HRA and DHS benefits, programs, and services. As we have testified previously before this Committee, the current shelter census level of 58,227 as of June 25, 2017 did not occur over night.

Changing the trajectory

Since the 1980s, the face of homelessness has substantially shifted from the largely single male population struggling with justice system involvement, mental health challenges, substance use disorders and inconsistent employment to what we see today – 70% of those in shelter are families, and 34% of the families with children in shelter have a working adult.

Since the 1980s, homelessness has increased exponentially. There are many factors that contributed to what has been a 115% increase in New York City's homeless shelter population from 1994 to 2014, and the steady upward trajectory of the past 35 years:

- Stagnant wages resulting in an increasing gap between wages and rent – between 2005 and 2015, the median New York City household income increased by just 4.8 percent in real dollars, while the median rent increased by 18.3 percent in real dollars.
- Systematic reductions to multiple anti-poverty tools such as cash assistance, food stamps and Medicaid;
- The prevalence of clients experiencing domestic violence;
- Insufficient support and resources to address barriers to housing facing New Yorkers with mental health and substance use disorders, including long periods of institutionalization or incarceration;
- And the loss of over 150,000 affordable or rent stabilized units.

However, one factor led to a particularly stark increase in the City's homeless census and affordability crisis – the abrupt end of City and State rental assistance provided through the Advantage program, which had offered subsidies for people in shelters if they took part in job training. Between April 2011, when the Advantage program ended and 2014 when this Administration reinstated rental assistance and rehousing programs, the DHS census grew by an extraordinary 38 percent – some 14,000 people.

The homelessness problem we face today is the result of decades of changes in our economy and past choices made in New York City, Albany, and Washington.

Our efforts to date have stabilized the number of people in our shelters, which, without our initiatives, would have reached some 70,000 instead of the 58,227 as of this weekend.

Since coming into office, Mayor de Blasio has restored the City's rental assistance programs and directed unprecedented resources toward a new comprehensive and holistic approach to fighting homelessness focused on prevention, street homeless outreach, expanded transitional housing options, averted shelter entry, improved shelter conditions, expanded civil legal services, and more robust rehousing and aftercare services.

The City's prevention first strategy includes an array of tools, recognizing that the path to homelessness is not linear and therefore our approach cannot be one that is a one-size fits all approach. Every individual in our shelter census is just that, an individual and their path towards self-sufficiency must address their individual needs.

Since 2014 we have enhanced our homeless services and assistance, including these initiatives:

- **Stepped in to immediately fill the gap left by the cancellation of the Advantage program by creating three new rental assistance programs and reinstating rehousing programs—implementing the Living in Communities (LINC), City Family Eviction Prevention Supplement/Family Exit Plan Supplement (CityFEPS), and the Special Exit and Prevention Supplement (SEPS) rental assistance programs and restoring Section 8 and**

New York City Housing Authority priorities—which have helped 51,500 people from the summer of 2014 through December 2016, most of them homeless, secure permanent housing and an additional 8,860 so far in 2017, for a total of 62,158 children and adults who have been helped through this commitment of permanent housing resources;

- **Provided emergency rental assistance to 161,000 households**, helping rent-burdened New Yorkers at risk of eviction stay in their homes;
- **Launched the largest municipal commitment ever to build and expand supportive housing** by committing to building 15,000 new units in 15 years, with the first 550 units coming online this year;
- **Aggressively expanded free legal assistance for New Yorkers** in danger of illegal eviction by increasing funding for legal services for tenants to \$62 million—a more than tenfold increase. Evictions then dropped by 24 percent and more than 40,000 New Yorkers were able to stay in their homes in 2015 and 2016;
- **Made a commitment to phase in over the next five years the funding necessary to provide universal access to legal services** for all New York City tenants facing eviction in housing court;
- **Moved ahead of schedule on the largest affordable housing plan ever**—the City’s landmark *Housing New York* plan to build or preserve 200,000 affordable apartments of which over 62,000 units have been financed;
- **Committed to adding 10,000 affordable apartments for seniors, veterans, and New Yorkers earning less than \$40,000 per household**;
- **Implemented 46 systematic and management reforms to streamline how we address homelessness**;
- **Conducted almost 16,000 shelter inspections in 2016—a 84 percent increase from 2015—and fixed more than 14,000 code violations** with help from nonprofit shelter providers thanks to the work of the Shelter Repair Squad, a multi-agency task force. The number of outstanding violations within traditional shelters has dropped 83 percent since January 2016;
- **Gotten out of 925 cluster sites, which is 25% reduction in the 17-year cluster apartment shelter program**, prioritizing units with the most serious problems and moved toward ending the use of cluster units altogether by reducing the number of cluster units from 3,658 to 2,733 today;
- **Doubled the previous investment in DHS shelter security**, with a total annual security budget of \$217 million for fiscal years 2017 and 2018;
- **Put the New York City Police Department (NYPD) in charge of security at DHS shelters**, which includes standardizing and professionalizing security, surveillance, staff training and deployment;

- **Placed 3,153 homeless veterans into permanent housing, and received certification from the federal Department of Housing and Urban Development as having ended chronic veterans' homelessness.**
- Through HRA's newly formed Source of Income (SOI) discrimination unit, taking action to prevent and prosecute housing discrimination based on source of income – and fighting SOI discrimination, through the City Commission on Human Rights (CCHR) filing of five complaints against large landlords and brokerage firms that together control about 20,000 units citywide (In 2015 CCHR quadrupled the number of investigations into SOI discrimination and in 2016 it filed more than 120 SOI discrimination investigations—the highest number in its history.);
- And created the Homelessness Prevention Administration housed within HRA to oversee prevention programs to improve program management and effectiveness.

Understanding that problems with shelter safety, conditions and services can serve as barriers to shelter entry and exit, the City has redoubled its efforts to provide safe, decent living conditions and high-quality social services to every family and individual living in shelter. Some of the initiatives and reforms we have undertaken include:

- Creating the shelter repair scorecard to track shelter conditions.
- Implementing an enhanced shelter repair program.
- Increasing security at all commercial hotels that house homeless families and individuals.
- Providing 24/7 security coverage at mental health shelters.
- Overhauling reporting on critical incidents.
- Restoring a program for domestic violence services at shelters that was eliminated in 2010.
- Initiating a New York City Police Department (NYPD) shelter security review and retraining of Department of Homeless Services (DHS) Peace Officers.
- Announcing and implementing a plan to end the 17-year-old cluster shelter program and the use of commercial hotels.
- Addressing ADA accessibility in shelters through a comprehensive litigation settlement with a plan to evaluate ADA accessibility in the DHS shelter system and implement a compliance plan.
- Expanding programming, including Adult literacy, High School equivalency programming and employment services, to help clients move forward on a career pathway.

- Getting away from the one-size-fits-all approach by working with providers to develop shelter models in which individualized shelter placements are made in accordance with the client's specific needs.
- Enhancing domestic violence services in DHS shelters through expanded HRA NoVA (No Violence Again) services in DHS Tier II family shelters and increased training for Tier II shelter staff.
- Enhancing services for LGBTQI clients – for example, in February of this year, in partnership with Councilmember Torres, we opened an 81-bed shelter in the Bronx for LGBTQI young homeless adults (ages 21-30).
- Eliminated the requirement for school-age children to be present at PATH for multiple appointments: By the end of 2016, this requirement was eliminated for families who reapply within 30 days at PATH. A second phase eliminating this requirement for families reunifying with children in foster care was launched in March. An evaluation of these programs will occur during the summer of 2017.

In addition to the reforms just described, our April 20, 2017 testimony describes in detail the agency's progress on the 46 reforms adopted following the comprehensive 90-day review of homeless services last year, including reforms aimed at prevention, shelter and rehousing.

I would now like to walk the Committee through the client experience from initial application at the Prevention Assistance and Temporary Housing (PATH) intake center back to self-sufficiency in the community.

However, at the outset, I want to highlight several considerations in evaluating the current status of our programs. As we testified at the April hearing regarding the status of the 46 reforms we announced just over a year ago after the 90-day review of homeless services, we are well on our way in the implementation phase for these substantial changes in the 20-year-old homeless services system – but, of course, we are addressing systemic problems that built up over many years and the full impact of the reforms will not be felt immediately. Moreover, it was just a few months ago that we released the Turning the Tide plan to completely transform the shelter system that was created in a haphazard way over nearly four decades. For clients, this major reform is just beginning. As someone who sued the two agencies that I now run over the course of four decades, I certainly understand both the urgency of making change for clients and the complexity of making the necessary institutional reforms.

Prevention Assistance and Temporary Housing (PATH)

The City has a broader array of prevention tools than ever before, including expanded rent arrears, rental assistance, and legal services as well as assistance for family and friends who can

provide alternatives to shelter in the community. We therefore encourage families facing potential homelessness to seek help first at one of our Homebase offices in all five boroughs.

As a last resort, families can seek shelter at the Prevention Assistance and Temporary Housing (PATH) intake center, which is located at 151 E. 151st Street, in the Bronx. PATH is open 24 hours a day, 7 days a week, 365 days a year.

In City Fiscal Year 2016, DHS' Prevention Assistance and Temporary Housing (PATH) intake center handled nearly 38,000 applications from nearly 18,000 unique households – numbers which have remained steady since 2013.

Prevention at PATH/Family Intake

Upon arrival, reception staff members inquire about the family's reason for coming to PATH. In FY17 through May, we received an average of 2,982 applications per month.

When new applicants and those families reapplying after applying more than 30 days ago arrive at PATH, they are engaged by PATH social workers. These social workers provide crisis counseling, mediation services, and referrals to community-based resources as an alternative to shelter. For those families with housing options still available in the community, PATH social workers collaborate with HRA Homeless Diversion Unit (HDU) caseworkers, and Homebase offices throughout the five boroughs to put services in place to help families retain or secure independent housing without having to enter shelter. All families reapplying for services following a break in shelter services of less than 30 days, except those who have experienced domestic violence, are referred to meet with an HRA Homeless Diversion Unit (HDU) caseworker to further explore ways to avoid shelter entry through family mediation, legal services, HRA emergency grants, and rental assistance.

In addition to HRA's Homelessness Diversion Unit, co-located at PATH is HRA NoVA ("No Violence Again"), Department of Education (DOE) family assistance liaisons, Administration for Children's Services (ACS) liaisons and a contracted medical provider, The Floating Hospital.

Many of the families who arrive at PATH have existing medical and behavioral health care providers and thus not all families are referred to the on-site medical provider for comprehensive assessments. However, at PATH, families are referred to the Floating Hospital if a member of the family is pregnant, the family includes an infant under four months of age, or if any member of the family has any hospitalizations in the past month, any acute medical needs, or the presence of a communicable diseases. In addition, families self-reporting or observed to be facing mental health or substance use challenges are referred to DHS social workers for further assessment.

At PATH intake, ACS staff stationed at PATH conducts a nightly clearance of all families with children who present at PATH to apply for temporary emergency shelter; matches are then provided to DHS identifying families with open ACS cases. DHS staff members also learn of ACS involvement through the standardized intake interview, where a family has the opportunity to self-disclose this information. When PATH staff members learn of a family's ACS involvement through these means, they will contact ACS staff on-site at PATH or the ACS staff assigned to the family to inquire further regarding the family's housing needs.

Additionally, shelter staff has access to information fields in the DHS CARES system that identifies a family's ACS involvement.

Direct communication with DOE also occurs once a family is assigned to a shelter by way of an automatic feed. The DOE family liaisons as well as the 117 DOE liaisons in shelters assist in working with families to meet the educational needs of children while in shelter.

If families have no alternate housing options immediately available such that they would qualify for homeless prevention services, they are interviewed by a DHS family worker who obtains the family's two-year housing history, which serves as the basis for determining shelter eligibility. During the interview process, families may be assigned a conditional shelter placement while DHS investigates and assesses the family's individualized needs. Conditional placements last for 10 days on average. During this time, field specialists visit the homes of family and friends with whom the family previously resided to verify information provided during the interview. During this conditional placement, social service staff and social workers from DHS arrange in-person meetings, whenever possible, with families applying for shelter and family or friends they lived with previously to further pursue mediation and explain in greater detail available homeless prevention services and rental assistance programs to return to the community. Once the investigation is completed, an eligibility determination concerning the completeness of the application and the availability of other housing is written, reviewed, and provided to the family in the shelter placement.

Every household has a right to a legal conference at PATH if they are found ineligible. In addition, the family has 60 days after being found ineligible to request a Fair Hearing from New York State. Families determined ineligible for shelter receive follow-up outreach by DHS and HRA staff to direct families to services in their communities, including rental assistance when appropriate.

PATHway to permanency

As of June 25, 2017, DHS is sheltering 12,406 families with children, comprised of:

- 16,981 adults; and

- 22,117 children.

DHS operates and maintains over 160 shelters for families with children (FWC) throughout the five boroughs. These shelters are operated by over 70 providers most of whom are non-profit social services agencies contracted to provide services. Families currently reside in three types of shelter: Family Tier IIs, Family Hotels, or Family Clusters (individual apartments rented as shelter through the 17-year program that began during the Giuliani Administration).

Additionally, in order to meet our legal and moral obligation of shelter, we also house families in commercial hotels (a practice that dates back to the Lindsey Administration). As part of the Mayor's *Turning the Tide* Plan, we've announced that we will exit all 360 cluster apartments and commercial hotel facilities and thus shrink the shelter footprint by 45 percent.

Once in shelter, DHS begins working with families to develop a specific exit plan and an individualized pathway toward sustainable permanency through their Independent Living Plan (ILP), which includes five key steps.

Phase One: Pre-eligibility

Upon arrival at a shelter, the family is assigned a case manager in CARES, the DHS system of record. The case manager meets with the family to address any immediate needs and makes appropriate referrals. Case managers also review the documentation given to the client during the initial intake process and explain next steps for eligible and ineligible families.

During this time, discussions with clients also focus on the needs of children within the household, including school enrollment. The case manager refers the client to the Department of Education (DOE) liaison or the DOE Students in Temporary Housing borough contact. While DHS makes every effort to place families at shelter locations that correspond to the youngest school-aged child's school address, due to constraints in shelter capacity this is not always possible. Within the PMMR, we reported that during the first four months of FY17, there was a decline in the percentage of families with children who were placed in shelter according to the youngest school-aged child's school address. However, as we continue to implement our new borough-based shelter approach to provide shelters to enable families to be placed closer to the anchors of daily life, such as their schools, jobs, health care and houses of worship, we will be able to create the capacity necessary to address this need.

Additionally, referrals are made to the NYC Department of Consumer Affairs (DCA) and the Office of Financial Empowerment to enable clients to review their credit report, recognizing that a poor credit score or low financial literacy will present obstacles to self-sufficiency. Further referrals are made to appropriate housing readiness services, including, but not limited to, tenancy and housing preparatory workshops.

Phase Two: Initial Housing Assessment/Exit Plan Development

Immediately following a shelter eligibility determination, a CARES assessment is conducted and the shelter Case Manager and Housing Specialist work with the family to develop a sustainable, individualized exit strategy. During this process a comprehensive assessment of the family's current level of housing readiness as well as an individualized and special needs assessment is conducted and applications for public assistance are submitted. During these critical days, the family gathers housing documents and other information such as social security cards and birth certificates as set out in the Independent Living Plan (ILP). This time is also used to work with the family to explore the available housing options, including reuniting clients with family and friends in the community. This initial phase is also used to assist the family with completing and submitting housing applications, introducing them to aftercare services, and monitoring their case for public assistance compliance.

Phase Three: Exit Plan Initiation

In this step, the client and household members are linked to available and appropriate resources such as employment and job training opportunities, financial savings, continuing and/or higher education, as well as health and mental health services, as applicable. This time is also used to prepare the client for apartment viewings and interviews. Staff works with clients on approaches to interviewing for private market rental units. Clients are provided information such as how to approach an apartment viewing, including attire and etiquette, so that the client is prepared at the apartment viewing and interview. If necessary, clients are referred to programs such as *Dress for Success* and the *Men's Warehouse Gives Back to the Community Initiatives*. Throughout this step of the process, clients are also connected to child care services. Throughout this phase clients participate in monthly housing meetings with staff to review and discuss available housing resources and options. And case managers monitor the family's case for public assistance compliance and financial savings, and follow-up with referrals for each client as needed.

Phase Four: Housing Search

In Phase Four, clients meet with staff on a bi-weekly basis to review and discuss the Apartment Review Checklist (ARC), as well as to assess the client's overall progress with the housing search. Those clients who have been in shelter nine months or longer or have ACS involvement meet with staff on a weekly basis. These efforts are documented in the CARES narratives case notes. At each ILP meeting, case managers review and update the exit plans with input from Housing Specialists. If there is a change in the family's status, such as loss of employment or an addition to or removal from a family's household composition, the ILP and housing plan are immediately modified. When this happens the client is also re-budgeted at HRA.

During the Housing Search, the client may be escorted to the apartment viewing by the Housing Specialist. If the Housing Specialist is unable to accompany the client, the client is provided with a referral to the viewing with all pertinent information, including location/address, date, and time, the phone number of a contact person, written directions by public transportation or car, and given a MetroCard for travel to and from the location. If a client is non-compliant with two or more apartment viewings, the case manager meets with the family to reemphasize best practices associated with apartment searching and address other barriers that could result in a prolonged shelter stay. If a client continues to be non-compliant, a conference with the Program Director and Program Administrator and Client Responsibility Proceedings are scheduled.

The average length of stay for families with children in shelter declined by six percent from 435 days in the first four months of fiscal 2016 compared to 408 days for the 2017 period reported in the Preliminary Mayor's Management Report (PMMR). The housing search for families in DHS is affected by the many factors that lead them to shelter in the first place.

For example, as we detailed in the Turning the Tide plan, data from the Rent Guidelines Board reveals that between 1994 and 2012 almost 250,000 apartments lost the protections of rent regulation. While some units have been added as a condition for tax incentives and other subsidies that building owners received, there has been a significant net loss of rent-regulated units. Indeed, over those 18 years, the city suffered a net loss of about 150,000 rent-stabilized units, or 16 percent of the total rent-regulated stock.

Further in 2015, there were about one million Extremely Low Income and Very Low Income households—defined as households earning less than 50 percent of the Area Median Income for New York City—but there were only a little more than 500,000 rental units affordable to those households. In other words, the city has only half the housing it needs for about three million low-income New Yorkers.

New Yorkers who can only afford apartments at this rent level thus have few places to turn. While the city's overall rental vacancy rate of 3.5 percent poses problems for people of all incomes, renters only able to afford an apartment costing \$800 or less must search in a market with a vacancy rate of just 1.8 percent.

In 2016, a family of three with a household income of \$24,500 (equivalent to 30 percent of the Income Limit for the U.S. Department of Housing and Urban Development (HUD) for 2016) could afford to pay approximately \$613 per month in rent and utilities—a figure well under half of the city's 2015 median gross rent of \$1,317. In 2014, more than half of all rental households in New York City were rent-burdened and about 3 out of every 10 of the city's renters were

severely rent-burdened, which are households that pay more than 50 percent of their income on rent.

Recognizing this, DHS has stepped up its efforts to rehouse families back in the community as quickly as possible. By adding more robust prevention services, housing specialists at every contracted shelter, and additional housing staff at both DHS and HRA we continue to address the issue of rehousing clients in communities.

Phase Five: Appropriate Apartment Identified

When a viable unit in the community is identified, clients are assisted with packing and completing the Transport Request Form, introduced to the Homebase program in the community in which they will be living, the leasing document and other relevant documents are reviewed, and the broker or landlord is contacted to confirm the apartment has been secured, and the housing packet is sent out by the DHS Office of Client Resources (OCR).

Within seven days of the family identifying the unit, the case worker submits transportation and emergency furniture requests to OCR, as needed, and accompanies the family to the lease signing.

Phase Six: Move Out

Each week, DHS and contracted provider staff locate and secure apartments for clients to move into. After the lease is signed, the expectation is families move out of the shelter and into their apartment within 48 hours. Shelter staff works to ensure that the family is packed and ready to move out on the scheduled day and time and is present with the family throughout the process. Once the family has exited shelter, the family's case file is updated with the client's new information and home address. However, as described with respect to aftercare below, the agency's interaction with the client does not end there.

Investments to Enhance Services for Families in Shelter

The Adopted FY18 budget included key investments in order for HRA and DHS to continue to address homelessness prevention, shelter, and rehousing needs.

The FY18 Adopted Budget included a \$3.7 million addition to fund 61 positions for adult family and families with children intake operations:

- 20 HC Adult Family Intake Center positions;
- 12 HC PATH Social Workers;
- 19 HC PATH intake and
- 10 HC PATH child care workers.

Further, within HRA's Homelessness Prevention Administration Unit, the Executive budget adds 17 positions to support rehousing and placement out of shelter, complemented by 13 additional positions in DHS. This investment provides more support to supplement ongoing initiatives to move individuals and families from shelter to permanent housing.

Previously in April 2016 following the 90-day review, DHS announced that it would rationalize payment rates for shelter providers, to ensure that all contracted shelter programs can provide consistent and high quality levels of service and are able to maintain their facilities in accordance with City and State standards for operations, including caseload ratios; resources for special needs and facilitation of housing placement; real-time maintenance and repairs; and funding for health and safety needs, including security and support staff.

To effectuate this rate reform and shelter services enhancements, the FY17 and FY18 adopted budgets project \$146 million for model budgets for shelter providers. But the model really includes more than just \$146 million. The rate reform includes a series of new initiatives that must be viewed holistically and that together form the model budget. This includes Thrive (\$34 million); the FY16 and FY17 COLAs (total of \$11 million); and the FY18 provider wage adjustment (\$5.7 million in FY18 growing to \$10.7 million in FY19, although this is inclusive of non-shelter providers as well). The January 17 Plan added Adult shelter enhancements of \$9 million for not-for-profit providers; \$17 million was added for security at mental health shelters in the January 17 and Executive 17 Plans; and \$5 million is provided annually for one-time shelter maintenance and repair costs that are not capitolly eligible. Taken together, these investments for not-for-profit shelters total over \$200 million when fully annualized.

Moreover, we expect some benefit from the settlement reached in April in the Legal Aid Society's litigation against the State concerning the public assistance program known as the Family Eviction Prevention Supplement that provides a monthly rental subsidy to low-income families with children in New York City. As part of the settlement, the State is approving a new rental assistance plan that we submitted for this program. Under the settlement, a family of three currently eligible for \$850 per month in rental assistance through the State-approved program, for example, will be eligible for \$1,515, representing a 78 percent increase. Another important outcome of this settlement is that now each year 1,000 survivors of domestic violence, who previously were ineligible for this subsidy, are eligible as part of the new plan that we submitted to the State.

Social Workers in Shelters

In 2015, the Mayor and the First Lady announced a historic plan of action called ThriveNYC to guide the city towards a more effective and holistic system to support the mental well-being of New Yorkers.

Recognizing the diverse needs of our clients, as well as the fact that being placed in shelter can distance families from their support networks such as their family, friends, neighbors, houses of worship and daily routines, thereby increasing stress, we are onboarding social workers at each contracted shelter to serve as Client Care Coordinators; over 100 Social Workers have been hired thus far.

These Client Care Coordinators are Licensed Master Social Workers placed in shelter to work with families as they navigate multi-systems and cope with the stressors and anxiety associated with homelessness.

Through the use of the Client Care Coordinators, DHS seeks to:

1. Enhance the delivery and coordination of services to families with children in shelter.
2. Promote and model best practices for shelter social service provider staff.
3. Improve linkages to mental health and community-based services.
4. Increase the ability of shelter social services staff to address mental health issues in a culturally and linguistically sensitive manner that incorporates strength-based, family-driven and youth/child-guided care.
5. Strengthen overall permanency outcomes for families with children in shelter.

Aftercare

Currently, seven different non-profit agencies run Homebase programs citywide. Homebase has been dramatically expanded by the de Blasio administration, increasing the number of Homebase locations from 14 in fiscal year 2015 to 24 today and doubling the program's funding.

A total of nearly \$59 million annually starting in FY18 will support an enhanced HomeBase program that will provide coordinated preventive, aftercare, and community support services, including benefits advocacy, budgeting, employment, short-term financial assistance, and help with housing relocation. The new program includes the baseline funding for prevention programs previously in DHS totaling \$39.2 million as well as \$18.2 million in HRA that was added to the budget with the advent of the new rental assistance programs and as part of the 90-day review.

Between July 2016 and May 31, 2017, 25,492 Households (70,707 Individuals) were served by Homebase, citywide. Over 90% of these households remain in the community and do not enter shelter within one year of services.

Homebase programs craft housing-focused individualized service plans that can contain the following core services:

- Eviction prevention
- Tenant/landlord services
- Mediation
- Assistance with relocation
- Employment and training
- Social service referrals
- Flexible short-term financial assistance
- Rental assistance screening and application

HRA is currently completing a new RFP process for Homebase non-profit providers that added aftercare supports to households leaving shelter and five new service areas to the Homebase network. These new awards will be announced this summer and the additional services will begin in September.

Homebase's aftercare services are available to all households leaving shelter through a rental assistance program, as early as possible in their tenancy, followed by a thorough assessment, the development of an individualized service plan, and intensive services for the most at-risk households. Services include long-term support as well as engagement with households in the midst of short-term housing crises.

HRA workers are also onsite at Homebase to assist with the tenants' public benefits issues and emergency rent arrears grant applications. Homebase also offers regular workshops, inviting at-risk community members, including former shelter residents, and providing information on affordable housing, subsidies, employment, work supports, and financial empowerment.

Outreach

Many people do not reach out for help before they lose their homes—in part because they never knew help was available. That is why the de Blasio administration has deployed a multifaceted outreach strategy to reach the individuals and families most at risk of losing their homes. Posters on subways and buses, supplemented with printed brochures, are accompanied by social media marketing as well as television and radio spots. These campaigns also focus on local houses of worship, community events, schools, and elected officials, who can help make important connections between prevention services in their communities and the people who need them.

Homebase staff also conducts outreach by going directly into the city's neighborhoods to engage people in public spaces—outside supermarkets, check cashing businesses, and nail

salons or at buildings with many eviction notices. They attend community events, speak at places of worship, and build close referral relationships with neighborhood schools. Together, Homebase's efforts are a powerful component of the City's strategy to reduce the number of families and individuals in shelters.

For example, earlier this month, I joined Brooklyn Borough President Eric Adams at New Bridges Elementary School in Brooklyn in an effort to reach families that come from zip codes that have high rates of shelter entry to let them know about the services available to them so they can continue to live in the community and avert shelter entries. We know that every year when the last school bell rings in June families who are holding on in unstable housing to ensure continuity in their children's education have difficulty continuing to stay in precarious situations. We want families to know before they seek shelter that resources to remain in the community are available to them. Available resources include legal services to address wrongful evictions and unlawful actions by landlords, rent arrears payments to stave off an eviction case, or rent payments for family and friends who are making rooms available in their homes.

Putting Clients First

In totality, the goal of this Administration and all of our reforms is to remove real barriers to accessing vital City services and to ensure that clients have unencumbered access to these services when they need a helping hand. At HRA for example, we have reengineered access points for our benefits and services, expanded the use of technology for online transactions, and recently launched HRA's mobile app.

At DHS, through a comprehensive review of homelessness program services and restructuring our agency to improve the delivery of our services to clients, we are focused on improving client outcomes by recognizing that each family in need of our assistance has unique challenges. By adding additional social workers in shelter and increasing daytime programming in shelter, we are improving our ability to connect our clients to critical resources to help them move forward on their path to permanency.

As our work continues and we implement our reforms, we look forward working with this Committee as well as advocates to ensure we are serving the families and individuals within our system effectively so that they can return to the community and self-sufficiency.

Responding to Introductions

In each instance, regarding the package of bills before the Committee today, we look forward with working with the sponsors to address the concerns that underlie the proposed legislation.

Proposed Int. No. 855-A

The bill would require the Human Resources Administration to (HRA) to determine if public assistance recipients may qualify for additional forms of public assistance. When HRA determines that an individual may qualify for other benefits, the bill would require HRA to notify those individuals that they may qualify for additional forms of public assistance and send those individuals applications with instructions on how to apply for that assistance. The bill would also require HRA to pre-fill the application with any information HRA already has from the recipient's original application.

HRA has undergone significant modernization efforts since 2014 with respect to benefits access. To improve access to benefits and information on a pending or active case, we developed an online portal available to New Yorkers anywhere an internet connection is available. ACCESS HRA is an innovative tool that allows New York City residents to retrieve benefit information and apply and recertify for SNAP and other benefits. This portal allows clients to create an ACCESS HRA account to gain access to over 100 case-specific points of information in real-time, including application and case statuses, upcoming appointments, benefits account balances, and documents requested for eligibility determinations. Additionally, clients can make changes to contact information, view eligibility notices electronically, and opt into text message and email alerts. Clients can also request budget letters online. We continue to improve this tool to add new functionality and will soon allow recipients to submit their required Periodic Report in addition to reporting changes in circumstances. As of May 31, 2017 there are more than 300,000 HRA online accounts for SNAP households, and we receive over 33,000 submissions each month.

However, HRA's ability to utilize these approaches is the result of multiple Federal and State waivers in response to complex Federal and State regulations. As the City is focused on the reauthorization of the Farm Bill, including recently testifying before a House subcommittee on our technology innovations to expand access to benefits and promote program efficiencies, we are continuing to monitor the status of provisions of federal law that enabled us to obtain the waivers so that we can continue to receive them.

Given the continuing developments in Washington that can impact our benefits and services, we look forward to discussing with you steps that we can take to address the concerns that gave rise to this proposed legislation at this uncertain time. We also want to make sure that the proposed legislation takes into account the greater reliance we are placing on online transactions rather than paper transactions.

Proposed Int. No. 1461

The bill would require the Department of Social Services to provide customer service training twice per year to all employees that interact with members of the public.

As part of our reform initiatives, HRA has a robust training curriculum for all front line staff which includes a full day of client service training. Additionally, HRA conducts agency-wide trainings such as our new LGBTQI training.

Taking into consideration what we have already implemented to address the concerns reflected in the proposed legislation, we stand ready to discuss whether additional efforts are needed and feasible.

Proposed Int. No. 1577

The bill would require the creation of the Office of Case Management. The Office would be tasked with developing recommendations on how electronic case management systems used by City departments that provide direct services can be upgraded to facilitate information sharing among departments and increasing the use of digital tools to best serve clients. The Office would also develop recommendations on how systems which are required by the State may be updated to facilitate further information sharing. The bill would require the director of the Office to submit an annual report on all recommendations.

This proposed legislation broadly impacts many City agencies that provide case management services. In each instance the agencies and their case management systems are subject to different governing statutes and regulation from multiple levels of government. Additionally, agencies may be subject to different rules in respect to client confidentiality. The Administration and the Department of Social Services, in the instances in which HRA and DHS are impacted, are open to further discussions on what structures would make the most sense to move such a modernization effort forward, and we are always open to exploring technology solutions to better streamline client solutions.

Proposed Int. No. 1597

This bill would allow youths who have spent time in foster care to be eligible for rental assistance vouchers that would allow them to obtain stable housing. Eligibility would be limited to those 24 years old or younger.

As we have reported previously, we are in the process of streamlining our rental assistance programs in light of the recent FEPS settlement in litigation against the State. We expect the streamlining process to be completed this summer and we will consider the issues raised by the legislation as we do so. We also have to evaluate whether this well-intentioned legislation presents any legal issues.

Proposed Int. No. 1635

The proposed bill would require the Department of Social Services to create and issue a job center "visit receipt" for all individuals who visit job centers. The visit receipt would include the staff member's name, staff member's contact information, any documents received by the agency from the visitor, the reason for the visit, and a time stamp indicating the time and date a visitor was present at the job center. The bill would require the department to semiannually post to its website a report of the average constituent wait times at each job center. The bill would further require the department to display in job centers information on how to make a complaint and would require the department to issue a tracking number to track the status of a complaint. The bill would require the department to post semiannually to its website, a report of all complaints aggregated by job center and complaint type.

HRA looks forward to working with this Committee to address client service issues that are the focus of the legislation. However, consideration of the legislation should take into account the reforms in this area that we have already implemented. For example, HRA currently provides clients with receipts of visits at job centers and regularly reports on wait times. The "Confirmation of Contact with your Center" form was created to provide an individual who visits or contacts a Job or SNAP Center with a document that indicates the nature and date of the visit or contact.

As we have testified previously, we also rolled-out on-demand telephone interviews citywide, which allow clients to conduct their SNAP recertification applications at their convenience, rather than the old system of waiting for a call during a four-hour window, or having to come into a center and wait for an interview. In May, the current average wait time for an on-demand telephone interview was just a few minutes. As an additional enhancement, we plan to introduce on-demand telephone interviews for new SNAP applicants by the end of this year.

The bill would also require the department to semiannually post to its website a report of the average constituent wait times at each job center. We already post this information on the HRA website, <http://www1.nyc.gov/site/hra/about/facts.page>. For example, in April the Southern Brooklyn Center had a 22 minute wait time – the average wait time for all Job Centers in April 2017 was 42 minutes and the average wait at Non-Cash Assistance SNAP Centers was 30 minutes.

An HRA "Client Rights and Responsibilities" poster is already in use and outlines the client complaint process by phone and email. There is also signage which is prominently displayed in applicant/client waiting areas that addresses concerns such as "resolving a problem," "what you should know if you have an emergency," and how to contact the "HRA Central Complaint unit" and advises clients on how to file a complaint. Further, HRA's website provides

information on how to initiate a complaint with the Commissioner and a SNAP discrimination complaint. In addition, for SNAP discrimination complaints the Office of Temporary and Disability Assistance requires that a "Food Stamp Complaint Procedure Poster," be posted. And finally, one of the State Office of Temporary and Disability's required information booklets, "What You Should Know about Your Rights and Responsibilities When Applying for or Receiving Benefits," includes information on filing discrimination complaints. HRA has a tracking system for client complaints to make sure that they are addressed timely.

Proposed Int. No. 1642

The bill would require that any individuals or families receiving rental assistance vouchers established by the Department of Social Services, such as the current LINC, CityFEPS and SEPS vouchers, would continue to receive the assistance so long as the household continues to meet any other eligibility requirements. The bill would also require that the maximum rent toward which rental assistance vouchers may be applied annually increases at the same rate as the fair market rents set by the United States Department of Housing Preservation and Development. The requirements set by the bill would be subject to appropriation.

Currently, various of the City's rental assistance programs that are City Tax Levy funded, including LINC IV, City FEPS, and SEPS for households with a disabled member or a veteran, have no time limit. In contrast, LINC I and II are joint City/State programs and would require State approval to change the program and eligibility requirements, including the rent levels. In addition, the recent settlement in the FEPS litigation against the State sets forth the rent levels for this rental assistance program, which must be taken into account when evaluating whether City Tax Levy-funded rental assistance programs should have rent levels set that are different than those for the State-approved programs.

As we complete the process of streamlining our rental assistance programs in light of the recent FEPS settlement in the litigation against the State, we will consider the issues raised by the legislation as we do so. Again, we also have to evaluate whether this well-intentioned legislation presents any legal issues.

Thank you for this opportunity to testify and I look forward to your questions.

Councilmembers, please allow me to first thank you for proposing and supporting this initiative and for hearing the testimony of the efficacy of this proposed program. My name is Elana Duffy, and I am the founder and CEO of the support and civil services technology platform Pathfinder Labs. We provide a very similar service to the one proposed, linking our current test group of Veterans and their families to vetted community resources to support their reintegration process. We are also close to enabling universal registration features and direct referral services, as well as push notifications for eligible individuals. A significant number of the capabilities you are requesting in your initiative are already or soon to be features on our platform, so I am here to speak to some of our market research that ensures your goal is attainable.

The primary issue facing registration and referral of underserved populations is that each organization has different technological capabilities, and each individual has different needs and meets different criteria to be eligible for services. It's a fairly complex task, particularly when some of the organizations are still using paper filing systems.

How my company is solving this issue for the underserved is taking the following steps for services:

- We provide standardized information on each service listed, focusing in particular on limitations, restrictions, and other eligibility concerns. For example, since we are starting with the Veteran population, we are able to sort organizations by requirements for conditions like discharge status or service era. This ensures connecting the individual with a service for which they are immediately qualified. Income, family status, and other criteria could easily be integrated for general population needs in city services.
- We also categorize these services based on what they provide. In homelessness, for example, there are resources for at-risk populations as well as currently homeless populations, and this can be an important distinction for rapid response.
- We maintain this database of organizations, connecting with the organization to ensure correctness and completeness once. By storing this information in our database, we are not only able to have a consistently updated list of services provided, but we can provide analysis on request based on location, populations, numbers served, and so forth. This is one of the advantages of having a centrally maintained, third-party system as in your case, it can also be compared to non-city options for each service provided. This ultimately helps with planning of social services and an accurate assessment of needs met and needs outstanding in a population in which it is often difficult to obtain data.

In terms of the population, it can be challenging to get them enrolled, assessed, and referred. Your proposed bill addresses the fact that they cannot seek information they do not know they are looking for, so if they aren't aware of a particular resource they will not attempt to connect. Your solution, as is ours, is push referrals. This can be beneficial, but I would like to suggest a few other ideas:

- Some agency options are still on paper filing systems. A secure database of clients maintained over time is critical to not just analysis of the populations but also to referring clients to other services. Centralizing this database, particularly with a non-government party (which may be critical for security when discussing issues like enrolling and referring undocumented residents), will help provide a standard list of clients, needs, and eligibility conditions.
- Our system is enabling the referral system, including having data populate in the referral for enrollment in a new service, you speak of in your bill. We recommend a service to the user, and then will offer a way to directly request services in our system. We then pull relevant information from our database and send it to the requested service. This would mean the information is filled out once for the individual but can be used to access nearly any service in the local area.
- We are developing a mobile platform that will also enable push notifications, noting when someone is near a service they might be interested in or if an event is occurring in their area. We are developing the same capabilities on the web via email notifications. The city is rapidly expanding the Spectrum wifi kiosk locations, and more underserved populations have access to the Internet and even smartphone capabilities through the kiosks and through phone programs. Rotating city services in prominence through the city, or providing a log-on accessibility point through these kiosks, may be an efficient way to register, refer, and notify the populations in need of services.

In closing, I would like to establish my support for this initiative, and to offer further ideas, analysis, services implementation, and data points as needed. This project is important to resolving the connection between city services and the populations in need, and our experience shows these systems can work wonders when implemented properly. Initiative 855, when taken with the industry knowledge Pathfinder Labs and some of our local partners can provide, can be a cost-saving, efficient solution to the use and connectivity of the myriad of city welfare services.

Thank you again for hearing my testimony in support of this initiative, and for your continued service to the city of New York.



LENOX HILL NEIGHBORHOOD HOUSE
SINCE 1894

**Testimony of Alexandra Brandes before the New York City Council on behalf of
Lenox Hill Neighborhood House**

June 27, 2017

Thank you Council Member Kallos for the opportunity to testify at this City Council Committee on General Welfare hearing focused on the Process of Applying for Assistance. My name is Alexandra Brandes and I am the Supervising Attorney of the Health Care Access Project in the Legal Advocacy Department at Lenox Hill Neighborhood House.

I. Lenox Hill Neighborhood House

Lenox Hill Neighborhood House (“the Neighborhood House”) is a Settlement House on the East Side of Manhattan that started providing free kindergarten and meals to immigrant children and their families 123 years ago. We remain true to our roots, providing education to low-income children and serving hundreds of meals daily, but have expanded our services to address the needs of our community. We provide an extensive array of effective, holistic, and integrated human services—social, educational, legal, health, housing, mental health, nutritional and fitness—which significantly improve the lives of 15,000 people in need each year, ages 3 to 103. The Neighborhood House’s clients include indigent families and the working-poor who live in the East Side’s housing projects and tenements or who travel to the Upper East Side to work in low-wage jobs such as cashiers, housekeepers, nannies and laborers; 10,000 seniors; and hundreds of mentally ill homeless and formerly homeless adults.

II. Our Public Benefits Experience and Expertise

The Legal Advocacy Department at the Neighborhood House provides comprehensive civil legal services to low-income individuals and families on the East Side. Our attorneys, advocates, and volunteers assist thousands of New Yorkers with applications, renewals, and appeals related to public benefits each year. Last year our team assisted nearly 2,500 individuals access one or more of the various public benefits. We help hundreds of clients annually access, maximize, and maintain their SNAP benefits to help ensure adequate nutrition. Through our Health Care Access Project we assist thousands of clients receive necessary medical care through insurance enrollment in Medicare, Medicaid, Essential Plan, and/or Qualified Health Plan; apply for financial assistance programs to reduce out-of-pocket medical costs including the Medicare Savings Program, Extra Help and the Elderly Prescription Insurance Coverage (EPIC)); arrange Pooled Income Supplemental Needs Trusts for Medicaid beneficiaries; and assist clients with accessing disability benefits to which they are entitled such as Supplemental Security Income, Social Security Disability Insurance, and the New York State Supplemental Program. In addition, we represent hundreds of tenants facing eviction in housing court and help hundreds of clients receive and maintain housing related benefits such as the Senior Citizens Rent Increase Exemption (SCRIE), the Disability Rent Increase Exemption (DRIE), and Section 8 that allow them to remain in their homes.

Given our holistic approach to legal advocacy, when clients contact us for assistance they are screened for every public benefit. Frequently, clients are receiving only one of several benefits to which they are entitled. For instance, in the fall a senior came to our office for assistance because he could not afford to buy his asthma medications which resulted in severe complications and hospitalization. Although the client received the maximum SNAP benefit, he did not know he

qualified for the Medicare Savings Program, EPIC, and SCRIE. Fortunately, our office helped him enroll in all three of these programs which allowed him to afford his medications and also remain in his apartment without fear of future rent increases that he would not be able to afford on his limited income from Social Security. Had he been informed of his eligibility for these programs upon approval of his SNAP benefits, he may never have been hospitalized or suffered irreparable medical complications. This client represents what many New York City residents over 65 experience as nearly a quarter live below the poverty level (U.S. Census Bureau, 2011-2015 American community Survey) and are forced to choose between buying necessary medical care and food (NYC Hunger Experience, 2012).

In addition to seniors, the Neighborhood House's programs assist the working poor. Through our Early Childhood Center we provide education and meals to 141 low-income families every day. A quarter of working poor families in New York City live in poverty (U.S. Census Bureau, 2011-2015 American Community Survey) and 70% have difficulty affording needed food (NYC Hunger Experience, 2012). As families struggle to provide food, almost half cope by reducing meal size, while a quarter skip meals (NYC Hunger Experience, 2012). As low-income families in New York struggle to provide adequate food, nearly a quarter of the working poor eligible for SNAP in New York City did not receive it in 2013 (NYC Hunger Experience, 2012). Given the dire need, meaningful access to available public benefits is critical.

III. Support for Int. No. 855-A

Lenox Hill Neighborhood House fully supports the proposal to expand notice of public assistance eligibility. Efforts to expand access to public benefits by providing sufficient notice are long overdue. We also support the City Council's Resolution calling upon the administrators of public benefits in New York City to develop and implement a plan, which includes the number of

people the department seeks to enroll and the actual number enrolled in public benefits.

IV. **Oversight: Strategies for Improving Access to Public Benefits**

With regard to strategies for improving the access to public benefits, we would like to highlight several areas where legislative intervention is needed.

A. **Increase Transparency**

First, the department should be statutorily required to include in its report to the City Council the number of eligible people for each public benefit. This, compared to the actual number of people enrolled in each public benefit, would provide information about the unmet need. Lacking such critical information, the administrator's interventions would seem effective merely by meeting their target enrollments. However, meeting a predetermined target and reaching the eligible people in need are distinct. As such, the number of eligible people should serve as the total enrollment goal, rather than an arbitrary number developed.

B. **Expand Notification to Include Potentially and Prospectively Eligible**

Second, the statutory notification requirement should expand beyond current benefit recipients to include individuals who are not receiving benefits but are potentially and/or prospectively eligible.

- 1) Notification should be targeted to people who are potentially eligible based on one known factor. The administrator's plan describing enrollment of eligible individuals should include notification to people who live in rent stabilized, rent controlled, or other qualifying buildings in the city who may be eligible for SCRIE or DRIE.

Currently, most people are unaware that SCRIE and DRIE exist because it is not advertised or well known. Considering the New York State Division of Housing and Community Renewal (DHCR) has information of all the rent stabilized and rent

controlled apartments in New York City, notification to those tenants about SCRIE and DRIE qualification criteria, application process, and where to find assistance with applications would be simple. As such, all tenants should be notified of their potential eligibility.

- 2) Notification should be provided to people who are prospectively eligible. Each public benefit has different eligibility criteria and a public benefit's particular eligibility can vary based on demographics. For instance, a low-wage worker who applied for SNAP benefits at age 59 with \$1,600 a month in gross income may be denied for excess income. But, the same low-wage worker at age 60 would be approved because the income criteria increases for those 60 and above. This individual should be notified that the same application after attaining age 60 would result in a different outcome. Thus, prospectively eligible individuals should be notified of their eligibility for a particular benefit.

C. Reduce Lapses in Benefits

Third, the department should be obligated to reduce lapses in public benefits assistance via automatic recertification, expanded grace periods, and retroactive reinstatement for good cause.

1. Automatic recertification should be conducted for all public benefits. Currently, individuals who receive health insurance through the New York State of Health Marketplace are eligible to have their insurance (Medicaid, Essential Plan, Child Health Plus, or Qualified Health Plan) recertified and renewed automatically if the information can be verified using federal and state income data. The recipients of this health insurance simply need to authorize the use of data sources to verify their

continued eligibility. In addition to reducing lapses in enrollment, it alleviates administrative burdens of processing every renewal. As such, this request for authorization and use of available data should be replicated for all public benefits.

2. A minimum 90-day grace period for recertification should be implemented for all public benefits. For those benefit recipients who cannot be renewed automatically, a minimum of a 90 day grace period should be provided for people to recertify before their case is closed. Currently, each benefit has a different grace period for recertification, ranging from 30 days to 6 months. Frequently, clients do not receive sufficient notice of the recertification and are made aware recertification was due when benefits are terminated. When this happens, they cannot submit the recertification paperwork because their case is closed. Rather, they must reapply for benefits. The only way to avoid a lapse in benefits is to request a fair hearing and prevail on the inadequate notice issue. Allowing additional time to submit recertifications before cases are closed would reduce the number of fair hearings requested for inadequate notice and avoid the delay in reinstating lapsed benefits.
3. Retroactive reinstatement of lapsed benefits for good cause shown should be available in all public benefits. The opportunity for retroactive reinstatement of lapsed benefits for good cause should be expanded to all public benefits. Given the fundamental characteristics of the populations who are the intended beneficiaries of the public benefits programs, various circumstances can and do arise that interfere with the ability of program participants to submit renewal applications within the requisite recertification period and these factors should be considered. Such circumstances may include, but are not limited to: a spell of illness; a chronic

physical or mental health condition that interferes with daily functioning; a household emergency; lack of receipt of warning notices; and agency error. At present, the local agency lacks statutory authority to allow retroactive reinstatement of benefits for good cause shown in all public benefits. Such authority is present for SCRIE & DRIE, Public Assistance, SSI, and SNAP but should be expanded to all government benefit programs.

Helpful guidelines for defining the parameters of “good cause” are found in the rules and regulations governing other government benefit programs. For example:

Supplemental Security Income: In Volume 20 of the Code of Federal Regulations governing the Supplemental Security Income program, Section 416.1409 allows for an extension of the 60-day period for requesting reconsideration of a determination where good cause is shown for missing the deadline. “Good cause” is defined in 20 C.F.R. § 416.1411 as follows:

- (a) In determining whether you have shown that you have good cause for missing a deadline to request review we consider—
 - (1) What circumstances kept you from making the request on time;
 - (2) Whether our action misled you;
 - (3) Whether you did not understand the requirements of the Act resulting from amendments to the Act, other legislation, or court decisions; and
 - (4) Whether you had any physical, mental, educational, or linguistic limitations (including any lack of facility with the English language) which prevented you from filing a timely request or from understanding or knowing about the need to file a timely request for review.
- (b) Examples of circumstances where good cause may exist include, but are not limited to, the following situations:
 - (1) You were seriously ill and were prevented from contacting us in person, in writing, or through a friend, relative, or other person.
 - (2) There was a death or serious illness in your immediate family.
 - (3) Important records were destroyed or damaged by fire or other accidental cause.
 - (4) You were trying very hard to find necessary information to support your claim but did not find the information within the stated time periods.
 - (5) You asked us for additional information explaining our action within the time limit, and within 60 days of receiving the explanation you

requested reconsideration or a hearing, or within 30 days of receiving the explanation you requested Appeals Council review or filed a civil suit.

(6) We gave you incorrect or incomplete information about when and how to request administrative review or to file a civil suit.

(7) You did not receive notice of the initial determination or decision.

(8) You sent the request to another Government agency in good faith within the time limit and the request did not reach us until after the time period had expired.

(9) Unusual or unavoidable circumstances exist, including the circumstances described in paragraph (a)(4) of this section, which show that you could not have known of the need to file timely, or which prevented you from filing timely.

Conclusion

We support proposed Int. No 855-A, and suggest these additional legislative changes based on our extensive experience working with public benefit program participants. These proposals will result in practical, positive outcomes and improve the lives of those adversely affected by the described limitations of the existing statutory scheme. We appreciate the Council's investigation of these pressing matters and are hopeful that with action by the Council the concerns which we have described will be addressed.

Thank you again for the opportunity to testify today. As advocates on the front-line of public benefit work we applaud the City Council's decision to hold these hearings and to examine the status of the enrollment and access to these critical programs.

**Testimony Matt Bishop, CEO, Open City Labs on the “Process of Applying for Assistance” – Introduction 855-A of 2015
New York City Council Committee on General Welfare**

June 27, 2017

My name is Matt Bishop and I am CEO of Open City Labs. I am here to ask you to support this legislation because everyone deserves quick and efficient access to government benefits. As you know well, quality programs are only as effective as they are accessible. Nationally \$80 billion in government benefits goes unclaimed by people who are eligible. The downstream effects are increased hunger, poorer health and a missed opportunity to help people reach their potential.

I want to recognize the outstanding leadership of Mayor DeBlasio,

Commissioner Banks

/ Matt Klein and Ariel Kennan. Making city services more accessible has

been a major focus of this administration and programs like ACCESS NYC have shown national leadership. This legislation builds on existing initiatives and raises the bar even higher. Streamlining access is the crucial next step in addressing inequality in New York City.

My experience working at Volunteers of America, a nonprofit that contracts with HRA and over 20 other agencies to provide social services, showed me that government benefits can be a lifeline. Yet the process of applying for these benefits is tedious, and the clients must often repeat the same process from one agency to the next. In addition to the burden on clients, the burden on staff is enormous. I founded Open City Labs to make it easy to apply for government programs. As a technology entrepreneur I know that applying for government programs and services can be almost as easy as ordering lunch or calling a cab on your phone. Technology can make the implementation of this legislation possible and reduce paperwork for case managers. Every moment in unnecessary paperwork that we can save for HRA employees is a moment of opportunity. These moments of human connection between case managers and clients are the opportunities for self-discovery and self-healing that empower clients to take the next step to self-sufficiency.

Thank you.



Testimony of Joel Berg, CEO, Hunger Free America

Hearing Before The New York City Council Committee on Committee on General Welfare

June 27, 2017

My name is Joel Berg, and I am the CEO at Hunger Free America. Formerly called the New York City Coalition Against Hunger, Hunger Free America changed its name in 2016 to better reflect the broad scope of our national work. This was also accompanied with intensifying our local efforts under the new name, Hunger Free New York City.

I want to thank Chairman Levin and the rest of the Committee for your work fighting on behalf of the most vulnerable New Yorkers, as well as for the opportunity to testify. Hunger Free Americans strongly supports both Int. No. 855 and Int. No. 855-A to make it easier, less costly, and less bureaucratic for low-income New Yorkers to access safety net programs, many for which are federally-funded by underutilized. I would like to thank Council Member Kallos for introducing these pioneering bill.

Background on Hunger in New York

Hunger is a significant problem in the United States, as 42 million Americans,¹ including 12 million children lived in households that struggles to afford enough food in 2015. Nearly 3 million New York State residents, including 1.4 million New York City residents, lived in such homes.² In 2013-2015, almost half of all food insecure households in New York City include at least one person working, approximately 424,307 residents. Forty-five percent of all food insecure adults in New York City were employed. Low-income communities face both income scarcity and time scarcity, compounding the challenges to overcome these barriers.

The top reasons for this food insecurity are low wages, too few jobs, the high costs of living, and an inadequate safety net programs. One key additional factor in under-participation in existing federal programs.

¹ United States Department of Agriculture Economic Research Service. *Household Food Security in the United States 2015*. 2016. <https://www.ers.usda.gov/webdocs/publications/79761/err-215.pdf?v=42636>

² Hunger Free America. "The State of the Working Hungry: Low Wages Chief Cause of Malnutrition." *New York City and State Hunger Report*, 2016.

https://www.hungerfreeamerica.org/sites/default/files/atoms/files/National%20Working%20Hunger%20Release%20November%202016_0.pdf

Background on the Opportunity Costs of Poverty

Economists often apply the term “opportunity costs” to high and middle-income people, meaning that the time they spend on one task is time not available to perform other, potentially more valuable tasks. But social scientists rarely apply the concept to low-income people, acting as if their time is essentially worthless. Similar to a spouse who doesn’t count your food shopping, cooking, cleaning, child-rearing, accounting for family finances, shuttling family member to appointments, taking care of your sick parents, etc., etc. as work.

Yet in addition to lacking money, low-income Americans frequently lack time. Just as many personal relationships collapse when people don’t have “quality time” with each other, a lack of time works mightily against the efforts of low-income people to have constructive relationships with their families and with the broader society.

Many low-income people work two or even three jobs. If they are unemployed, they spend a great deal of time looking for work. They often travel by public transportation, laboriously making one, or two, or three connections to shuttle between home, work, social service agencies, houses of worship, and grocery stores. If they work as a nanny for someone else’s children, because they themselves can’t afford to pay for childcare or babysitters, they also must take the extra time to care for their *own* kids. If they work as home health aides to assist someone else’s parents, because they can’t afford home health care themselves, they also must take the time to care for their *own* folks.

While it’s true that government safety net programs help tens of million Americans avoid starvation, homelessness, and other outcomes even more dreadful than everyday poverty, it is also true that government anti-poverty aid is generally a major hassle to obtain and keep. Congress, which creates the laws governing the programs, and most state and localities, which implement those laws, purposely make it extremely difficult to advertise these programs and enable families to access them. That’s why many low-income people are actually unaware of all the government benefits for which they are eligible, reducing the amount of help going to Americans in need by tens of billions of dollars every year.

Even if low-income people *do* know about available aid, the journey to receive it is usually long, onerous, and time-consuming. They need to go to one government office to apply for SNAP (Supplemental Nutrition Assistance benefits, formerly known as food stamps), a different government office to apply for housing assistance, a separate WIC (Women, Infants, and Children nutrition program) clinic to obtain WIC benefits, and a variety of other government offices to apply for other types of aid – sometimes traveling long distances by public transportation or on foot to get there, and then, once they’ve walked through the door, they are often forced to wait for hours at each office to be served. Even when people initially apply for benefits online, they often have to physically go to one or more government offices to follow-up. They need to bring piles of paperwork to each office, usually with slightly different combinations of documents every time. Making copies of the paperwork also takes time (and money). The lines in these offices can seem endless, and sometimes clients need to wait outside, for hours, in the worst kinds of weather. If the office is especially backed up that day, or if the government case workers lost the previously-submitted paperwork, yet another visit on another

day will be required, taking the same excruciating travel and waiting times. Many offices don't have weekend or night hours, so if an applicant works, she or he will likely lose wages by applying for government help, since most low-income workers, unlike white-collar workers, often get no paid leave. Clients can try calling on the phone, but it's rare for a human being to actually answer, and the voice mailboxes are often full.

And when a bureaucrat finally sees an applicant at an office, they will usually ask many of the same intrusive, detailed, lengthy questions about finances and personal situations as similar government workers did at the last three offices. It's as if you have to explain to 12 different cousins at six different family get-togethers why your marriage fell apart and why you need to sleep on each of their couches for a night – while also having to hand over to each of them your complete tax records to prove why you are too broke to pay rent to them for that night of couch-surfing. In most places, families must even fill out additional forms, which their children must bring to school, to qualify their kids for free or reduced-price school meals.

To be sure, these government benefits provide a critical lifeline – and they often are the difference between a family eating and not eating and between them having a home or being homeless – but just because these programs are vital doesn't mean they are perfect. Besides, more affluent Americans aren't forced to jump through nearly as many hoops when they obtain far more expensive government aid, like farm subsidies or tax deductions for their vacation homes.

To obtain some form of help, low-income benefits applicants may also be required to attend job readiness classes, even if they have jobs or children at home. Such classes are often useless exercises in writing résumés for jobs that don't require résumés or in obtaining training for jobs that don't exist. Often these classes are worthless time sucks for attendees and exist to give large payouts to politically connected contractors. If applicants quit the classes, they often lose benefits for themselves and their children. The system pits parents against their children, over and over again.

Are you fed up? Are you tired yet? Well, if you live in poverty, your day has only begun.

Most poor folks, like all of us, also have to file tax returns with the IRS, sometimes paying a tax preparer handsomely to do so, even if the government owes them an EITC refund payment. A Progressive Policy Institute study found that in 2016, low-income workers paid an average of around \$400 each to national tax preparation chains.³

But wait, there's more.

Given that the United States has hundreds of thousands of nonprofit groups providing social services, it is nearly impossible for struggling people to determine which of those organizations provides services they need, whether the organization is conveniently located, and for which services they are eligible. If they do figure out that a nonprofit (or multiple nonprofits) could help, they will need to take the time to visit each one, where sometimes lines around the

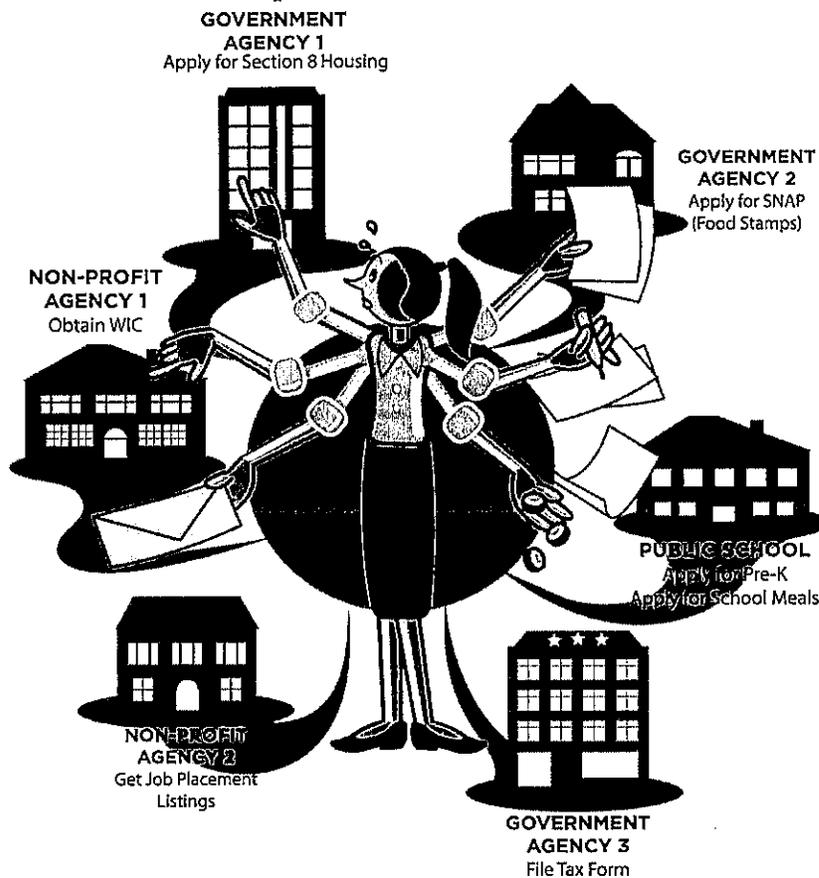
³ Paul Weinstein Jr, and Bethany Patten, "The Price of Paying Taxes II: How paid tax preparer fees are diminishing the Earned Income Tax Credit (EITC)," Progressive Policy Institute, April 2016, accessed June 10, 2016, http://www.progressivepolicy.org/wp-content/uploads/2016/04/2016.04-Weinstein_Patten_The-Price-of-Paying-Taxes-II.pdf

block ensure yet another seemingly endless wait, only to fill out even more paperwork, and go through yet more interviews.

And since many government and nonprofit programs require frequent re-applications and re-certifications, a low-income person often has to jump through all these hoops every few months. In America, trying to get out of poverty can be a full-time job.

Plus, it's rare for the multiple government and nonprofit programs aimed at low-income people to work together in a coherent fashion to bolster families' long-term self-sufficiency. Too often, these programs work at cross-purposes, so that obtaining one benefit might make a recipient ineligible for another. (The reverse is sometimes true, where getting one benefit makes a recipient automatically eligible for other benefits – but conservatives are trying to make that less common.) Sometimes a person can't win for losing, such as when she or he finally gets a raise and then loses benefits because of it, and the amount of the raise is less than the value of benefits lost. On the other hand, getting a job can make someone eligible for EITC payments, the value of which may exceed the amount of benefits lost. But that's a crap shoot too because it often depends upon household composition and a variety of other factors.

The Government/Nonprofit Social Services Status Quo



And that's not all.

If low-income people don't have a checking account or credit cards (and most don't), they can't pay bills by mail or online. Instead, they have to pay for everything in cash, spending money on extremely high fees at check cashing facilities that prey on residents of poor neighborhoods. And even then they aren't done, because paying bills in cash often requires a visit to the phone company, the electric company, the landlord, and the gas company, where more long lines await the person who must pay their bills in person.

Poor folks are less likely to have a washing machine in their homes or buildings, so more time must be spent at laundromats. There are neither doormen at their buildings, nor secured delivery spaces, so if they ever get a package, a trip to the post office is necessary -- where they will inevitably find even more lines.

For all Americans, including well-off ones, modern life is complex. There are always a zillion family, work, personal, community, religious, and civic obligations. With ever-shifting and complex options, it's a challenge to effectively juggle them all and it can feel impossible to plan for the future. But affluent Americans are able to get professional help in sorting through their options and obligations, utilizing the best personal assistants, financial advisors, and modern technology that their money can buy. Similarly, our government needs to get serious about helping low-income people clarify their options and simplify their lives.

Putting HOPE into the Palm of Your Hand

Technology has fundamentally revamped the lives of most Americans, usually for the better. Now it's time for use digital technology -- combined with policy improvements -- to simplify the lives and boost the long-term self-sufficiency of our lowest-income residents. That's why Hunger Free American has proposed that our federal, state, and local governments to create online HOPE (Health, Opportunity, and Personal Empowerment) accounts and action plans.

Here's how HOPE would work: The President and Congress would need to work together to enact a law that would authorize the federal Departments of Health and Human Services (HHS), House and Urban Development, (HUD), Treasury, and Agriculture (USDA) to work together -- and to form public/private partnerships with banks, credit unions, and technology companies -- to create HOPE accounts and action plans that combine improved technology, streamlined case management, and coordinated access to multiple to federal, state, city, and nonprofit programs that already exist. States and localities would initially be asked to participate in pilot projects implementing the accounts and plans, and, if they would, would be required over time to implement them universally.

One the accounts and plans are in place, workers could voluntarily choose to also have their paychecks deposited directly into the accounts, which would be held by private banks and credit unions that voluntarily chose to participate in the program. Families could also use the accounts to increase their savings, which would be matched by government and private sources, incorporating both IDAs and Kids Accounts. Job training and placement services would be modernized to connect real people with real jobs, and people could use the account app to easily locate and sign-up for such services online. All these efforts would work together in harmony to

better give people in poverty the tools they need to take charge of their futures and to implement long-term plans to climb into – and stay in – the middle class. If Congress fails to pass authorizing legislation, the next President could achieve much of the above administratively. Also, if Washington fails to act fully or at all, states or localities could step up to the plate to enact similar programs on their own.

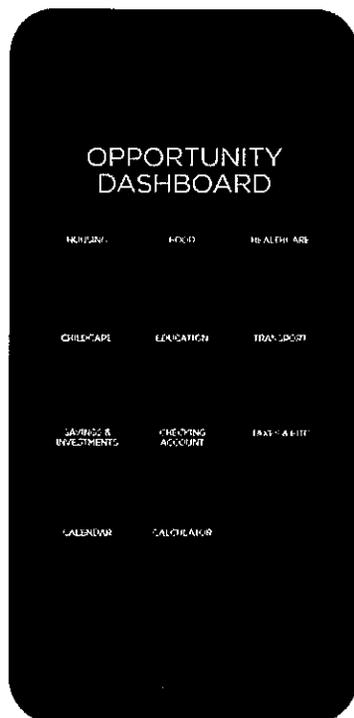
The federal government, and/or states and localities SUCH AS New York, could issue open calls to allow a variety of banks and credit unions to compete to create such accounts, and they pick a number of the best proposals, thereby allowing low-income consumers with a choice of financial institutions to pick. Once set up, HOPE accounts would enable families to use any smart phone, tablet, or computer to learn about the public and philanthropic programs for which they are eligible – including aid to improve health, nutrition, job training and placement, housing, income, etc. – and then apply for all of these programs at once from the convenience of their device. If supporting documents need to be submitted with the application, then families could take pictures of those documents and submit the pictures with the application. A surprising number of low-income people already have smart phones and/or home computers, not because they are luxuries, but because they are essential tools of learning and work in modern America. But families that don't own a smart phone, tablet, or computer could be provided a basic one, along with a subsidized Wi-Fi/Internet access plan, and people uncomfortable with technology could go to a library, government office, or nonprofit agency to be walked through the system. For elderly and disabled shut-ins who can't access the technology, government or nonprofit employees and/or AmeriCorps national service participants could make home visits to help. As noted previously, the AmeriCorps program should be expanded dramatically to aid these and other vital efforts.

To make it easier to access health care, HOPE accounts would also clearly specify medical benefits, and any out-of-pocket costs, for each of the health plans for which the users are eligible, and empower them to easily select the plan that works best for them.

The accounts would also enable working families to file for federal EITC refunds, and, in states and localities with their own supplemental EITC payments, to simultaneously file for those as well. Since the accounts will already have all the financial information needed to file for those payments, families could easily do so with this app, saving the time and money they would otherwise have to spend on third-party tax filing services.

While HOPE accounts are a new idea, the concept builds upon existing programs, such as the IDA program, and incorporates technological improvements in social services delivery that some forward-thinking states, cities, and counties are already implementing. For example, in New York City, the city government is already using updated technologies to allow families to apply online for multiple government benefits, through a portal called Access NYC (<https://a069-access.nyc.gov>), which allows users to pre-screen their eligibility for array of government programs, and, for some of the programs, to apply for them on line. The city has even started a pilot project to allow people to apply for SNAP and cash assistance, but not other programs, by smart phone. But even in New York, the number of programs to which someone can actually apply online is limited, and applicants still must follow various procedures, on various timelines to access various programs, and still must visit or call multiple offices.

A Better Alternative: Online HOPE Accounts



Building on such innovations, but moving beyond them, HOPE accounts would enable families to rapidly apply for – and quickly learn if they are accepted into – *all* federal, state, and local government programs, as well as offer users information for wide variety of services provided by nonprofit groups. HOPE accounts would also include a calculator system to help families understand the financial impact of one program upon other programs.

All program benefit funds would go into the same system, with health care, food, housing, and other specific benefits accounted for separately from the cash. Overall funding for these programs would be maintained, or increased, and federal benefits that are now entitlements, such as SNAP and Medicaid, should continue to be entitlements, which people would still have a legal right to obtain. Families would also be encouraged to put their own cash savings into the accounts, which could then be matched. Any cash in the account set aside for education, job training, starting a business, or buying a home would be non-taxable. Sure, that's a bit complicated, but still a heck of a lot easier for a family than figuring out all this out on their own. And if they still need help, some government and nonprofit social workers would still be available to guide them through the application and follow-up processes.

The accounts would allow low-income families to easily access and monitor – in one central online account – the status, amounts, and recertification deadlines for all their benefits and savings. They could also use the accounts to pay all bills online, saving outrageous check cashing fees, and enormous amounts of time.

The accounts could also include a budgeting function to give families real-time cash flow data and long-term financial planning data, including helping them to calculate how much they would lose in interest on credit cards versus how much they would gain in interest by saving more. The accounts would offer a calendar and scheduling function, enabling families to keep track of all job search, work, family, and school obligations, as well as any social service filing or appointment dates.⁴

Instead of a vast army of government and nonprofit caseworkers in charge of micromanaging the lives of low-income people, low-income adults would become, in effect, their *own* case managers. With this newfound power, people will be able spread their wings and take flight.

But to intrude on this love fest just as bit, I have to admit that these new apps and social service computer systems will be extraordinarily challenging to build and even more challenging to integrate with each other, especially given the current, antiquated condition of government social service computer systems, especially at the state level, and a unique system would need to be set up for each state.. These new system must combine ease of client access with very strict protections against fraud and theft, not easy considerations to balance. So the nation's top tech leaders and companies would need to be challenged to work together with government to make this a reality. Dear Mr. Gates, Zuckerberg or Bezos: if you successfully accomplish this, we'll add you to Mt. Rushmore – or if you prefer, we'll carve a new monument on one of the Santa Cruz Mountains.⁵ Alternatively, the White House – with input from HHS, HUD, Treasury, and USDA – could sponsor a competition that would provide a monetary reward for the company (ies) that built the best app to fuse all these programs.

It is also vital to stress that technological innovation alone won't solve these problems – a wide variety of federal and state laws must change in order to ensure seamless interactions between varied social service programs.

Likely Objections from Both the Left and the Right

Some conservatives will no doubt fear that an approach like HOPE would make it easier for low-income people to get government assistance, thereby increasing dependency and government spending. But HOPE would reduce government bureaucracy and paperwork, and ensure that more of the money spent goes to helping families instead of bureaucracies, all of which are professed conservative goals.

Some conservatives believe that getting government help *should* be a difficult, shameful process, and making it less so would only increase dependency on government. But it's inconsistent for the Right to argue for government to be less intrusive in the lives of most Americans but more intrusive in the lives of low-income Americans. Plus, by freeing up parents' time to give them more ability to work, study, and spend time with their families, HOPE is “pro-family,” “pro-work,” and “pro-education” and thus would *reduce* long-term dependency.

⁴ Careful security and privacy protections would need to be put in place, so that only the family, and not the government, nonprofit, or banking partners, would be able to see the or track private financial and appointment information.

⁵ Dear environmentalists: just kidding about the Santa Cruz mountains part. Please don't send protesters in rafts to surround my apartment.

Some liberals may also be wary because, at first blush, Hope accounts and action plans *appear* to be similar to the punitive contracts and safety net slashing block grant proposals advanced by Paul Ryan and other conservatives. But God is in the details, and, in reality, the HOPE accounts and actions plans would be 180 degrees different in both intention and implementation from conservative schemes. Yes, the delivery mechanism sounds similar, but we should not fixate too much on delivery mechanisms. After all, the Internet is a delivery mechanism that can deliver either text from the bible or pornography – it's the content, not the delivery mechanism – that truly matters.

The content of H.O.P.E is nearly the mirror opposite of the content of the Ryan plan. Ryan has used his anti-poverty plans as a cover for decimating existing government benefits for low-income families. In contrast, HOPE would provide anti-poverty benefits far above the current levels (out of *new* pots of money, *not* shifted from other antipoverty programs) so true self-sufficiency could be achieved. Unlike the Ryan and other GOP proposals that would replace existing federal programs, the HOPE accounts and plans would be *in addition to* existing government efforts. Unlike Ryan's proposal, which assumes that his proposed opportunity grants can somehow succeed even if the rest of the safety net is slashed and the economy is still failing, this proposal assumes that HOPE accounts and plans can be effective in tandem with a strong safety net and the broad-based economic growth that creates jobs and raises wages. HOPE would also end the arbitrary benefit cliffs that kick in when families marginally increase their incomes as they struggle to enter – and remain in – the middle class. Ideally, the HOPE initiative would be funded robustly enough by the government and the philanthropic sectors so that *all* those ends could be achieved.

Liberals may also worry that HOPE might undercut public employees and their unions, which provide liberal candidates with vital troops, votes, and donations. Given the union-busting campaigns undertaken by Scott Walker, John Kasich, and other GOP governors, such concerns are understandable. So let me make it crystal clear that the HOPE proposal is based on the assumption that most public employees are dedicated, underpaid, and have a right to organize to defend their interests. Some social workers would keep jobs similar to their existing ones, in order to answer questions about HOPE over the phone or from clients who still prefer face-to-face meetings. While HOPE would indeed eliminate most other government positions that are currently for handling paperwork and client interviews, this proposal recommends that employees holding those positions over time be transitioned into more useful functions such as training and placing low-income adults into living wage jobs, staffing universal pre-k programs, or aiding shut-in seniors. Public employees themselves would be happier if they spent less time filling out paperwork and more time directly aiding the public.

Some liberals worry that merely suggesting that government programs can be improved or that low-income Americans have personal responsibility for their own futures reinforces conservative messages, effectively giving "aid and comfort to the enemy." Some might argue more broadly that it's inconsistent for anti-poverty advocates like Marianna Chilton and myself, to effusively praise safety net programs like SNAP, but also pointing out their significant flaws. Those arguments are also reasonable, but ultimately they are not convincing. There's nothing inconsistent in pointing out that programs significantly improve the lives of recipients but could help beneficiaries even more if they were modernized. Just as even generally solid relationships

can always be improved by both sides thoroughly addressing life realities (including painful realities), so too, social services can be further improved through an unflinching examination of their current defects.

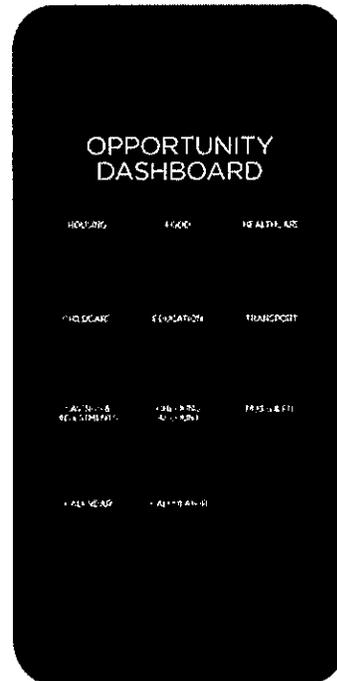
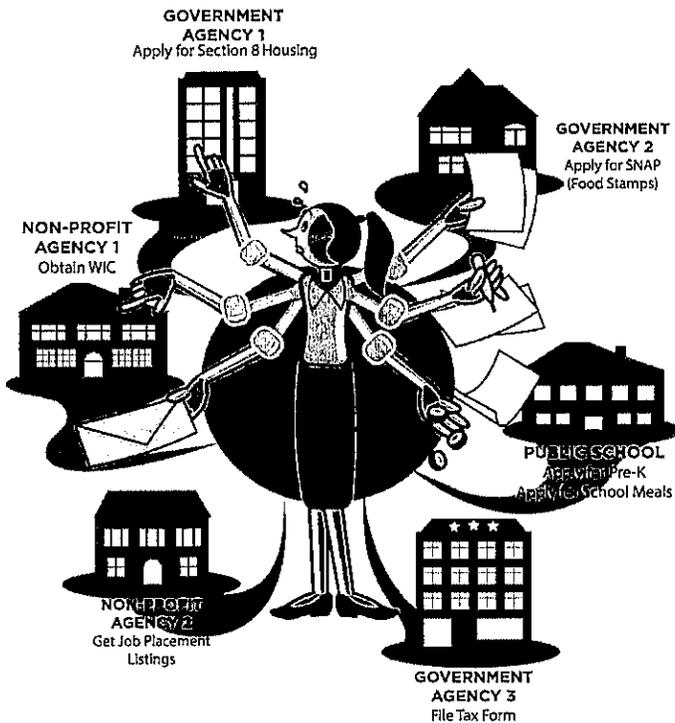
Some progressives might worry that funneling all anti-poverty funding into one program might make it easier in the future for conservatives to cut them. Yet the recent trend of omnibus budget deals has *already* allowed conservatives to cut all anti-poverty programs at once with tools such as the sequestration process. Taking no action because you are afraid things could get even worse makes little sense. That's sort of like when two people are in front of a firing squad, about to be executed, and one asks the other if they should ask for a cigarette, and the other responds: "Nah, I don't want to make them mad."

Taking the ostrich approach by ignoring both public concerns and real-life problems is a losing strategy, both substantively and politically. In contrast, FDR, the most successful progressive leader in US history, called for "bold, persistent, experimentation" because he understood that continually modernizing liberal programs was the best way to save them.

The most effective political defense is an offense. The best way to push back against possible cuts is to fight for *more* funding, which is why progressives should be clear that the HOPE system would need *more* money than the current system.

In the end, though, the question that is most important is whether HOPE would make life better or worse – in both the short-term and the long-term – for the people the programs are intended to help. So let's ask low-income Americans a basic question:

Should We Replace This ... With This?



Given low-income Americans' own frustrations with anti-poverty programs intended for their betterment the answer would likely to a resounding "yes."

Hunger Free America Strongly Supports Int. 0855 and 855 A

Hunger Free America Strongly Supports Int. 0855 and 855 as key steps towards implementing the HOPE idea. The requirement that HRA to pre-fill the application with any information they already have from the recipient's original application and notify individual if they qualify for additional benefit will alleviate some of the time pressure of applying for benefits—both for case workers and program participants and move New York City towards a more comprehensive and effective safety net. We strongly support unifying the application process.

A recent qualitative study cited the need for improved application processing capacity and infrastructure as one of the 3 major themes emerged from interviews with SNAP outreach workers.⁶ Long delays in processing time, complicated rules and involvement of the application process have been cited as sources of frustration from both the participants and the outreach organization.⁷ A more streamlined application process through reduced wait times, simpler recertification, and increased use of electronic documentation would improve the application process. We believe this bill will increase SNAP enrollment by reducing barriers for new applicants and reducing burden on households that are recertifying.

Individuals should receive, if desired, all benefits for which they and their households are eligible. HRA providing the tools to simplify the process will avoid duplicative administrative costs and ensure the support for those in need. An econometric study estimated that SNAP caseloads increased by 6.2% in the year following implementation of automatically or "categorically" eligible for SNAP based on being eligible for or receiving benefits.⁸ A simplified enrollment process has been shown to improve participation rates, and reduce the rate of in-person visits to the SNAP office for recertification.⁹

Short recertification periods make it more challenging for families to maintain their SNAP benefits because it may be difficult to maintain paperwork and travel to SNAP offices for transportation or work-related reasons.¹⁰ An ERS-sponsored study found that in 2000, applicants who were ultimately approved for benefits spent an average of 6.1 hours on the process and were required to make an average of 2.4 trips to the SNAP office. Prior to welfare reform, applicants spent an average of 3.9 hours and 1.6 trips to be approved for participation.¹¹

⁶ C. A. Pinard, F. M. W. Bertmann, C. Byker Shanks, D. J. Schober, T. M. Smith, L. C. Carpenter & A. L. Yaroch (2017) What Factors Influence SNAP Participation? Literature Reflecting Enrollment in Food Assistance Programs From a Social and Behavioral Science Perspective, *Journal of Hunger & Environmental Nutrition*, 12:2, 151-168. <http://dx.doi.org/10.1080/19320248.2016.1146194>

⁷ Fricke, H. E., A. G. Hughes, D. J. Schober, C. A. Pinard, F. M. W. Bertmann, T. M. Smith, and A. L. Yaroch. "An Examination of Organizational and Statewide Needs to Increase Supplemental Nutrition Assistance Program (SNAP) Participation." *Journal of Hunger & Environmental Nutrition* 10, no. 2 (April 2015): 271-83. <http://www.tandfonline.com/doi/abs/10.1080/19320248.2015.1004217?journalCode=when20>

⁸ Andrews, Margaret, and David Smallwood. "What's Behind the Rise in SNAP Participation?" *Amber Waves*. (March 1, 2012). United States Department of Agriculture (USDA), Economic Research service. Food & Nutrition Assistance. <https://www.ers.usda.gov/amber-waves/2012/march/what-s-behind-the-rise-in-snap-participation/>

⁹ Ibid [2]

¹⁰ Atasoy S, Mills BF, Parmeter CF. The dynamics of Food Stamp Program participation: a lagged dependent variable approach. Paper presented at: 2010 Annual Meeting, July 25-27, 2010; Denver, CO. <http://econpapers.repec.org/paper/agsaeca10/60963.htm>

¹¹ Ibid [4]

“Churning” occurs when SNAP participants leave the program and reenter less than 5 months later, causing additional costs to the program despite what is most likely no change in eligibility.¹² Eligible adults who work full time during nontraditional hours (i.e. nights and weekends) were more likely to participate in SNAP than those who work traditional daytime hours, and eligible adults with more than one job are even less likely to participate in SNAP.¹³

Households tended to exit SNAP during the recertification process due to application deficiencies, such as missed recertification, financial ineligibility, or incomplete information. Current practices continue to emphasize limiting fraud, despite the program having the lowest fraud rate in its history.¹⁴ People’s needs during times of recession and long-term unemployment should outweigh this concern. To alleviate food access concerns, it is important that those who are eligible are encouraged and can easily participate in social services programs such as SNAP. Simplifying the application process is no silver bullet in light of other problems associated with SNAP, such as income cliffs for eligibility; however this initiative makes strides in the right direction to address the underutilization due to difficulty with continued eligibility recertification and lack of information. We thank the Committee again for the opportunity to testify and look forward to working with you to make sure all New Yorkers and Americans have access to adorable nutritious food.

¹² Mabli J, Ohls JC. Supplemental Nutrition Assistance Program dynamics and employment transitions: the role of employment instability. *Applied Economic Perspective Policy*. 2012;34:187–213. <https://doi.org/10.1093/aep/pper045>

¹³ McKernan SM. Employment Factors Influencing Food Stamp Program Participation. <http://www.urban.org/publications/410800.html>

¹⁴ U.S. Department of Agriculture, Food and Nutrition Service. Supplemental Nutrition Assistance Program payment error rates FY2011. <http://www.fns.usda.gov/snap/qc/pdfs/2011-rates.pdf>

Community Service Society of New York
Testimony before
New York City Council Committee on General Welfare
June 27, 2017

Good afternoon Chairperson Levin and members of the NYC Council Committee on General Welfare. My name is Yvonne Peña, Project Director for the Community Service Society's (CSS) Benefits Plus Learning Center. I would like to thank Council Member Kallos for the invitation to be here today and thank you all for the opportunity to provide testimony on the process of applying for assistance along with Int. 855-A in relation to notification of public assistance eligibility.

CSS is a 176 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 the expertise in helping low-income New Yorkers access public benefits including Medicaid, SNAP, SSI, SSDI, Cash Assistance, Medicare, SCRIE, DRIE and many others through two signature programs.

The Benefits Plus Learning Center was created to address the problem that we all know exists – all too often NYC residents encounter a myriad of difficulties in accessing public benefits. The system can be difficult to navigate and social service professionals who work with NYC's vulnerable population cannot always keep up with rules and regulations that constantly change. The Learning Center provides intensive education services about the NYC public benefits system to social service professionals and other service providers through its trainings and *Benefits Plus*, an online manual with comprehensive information on more than 80 different federal, state and NYC public benefits and housing programs. The Learning Center partners with social service organizations to ensure that people on the front lines

have the resources they need to serve their clients more effectively. The Center offers a unique service – it is the only program of its kind to provide such depth and breadth of information about public benefits in New York. In 2015, the Learning Center earned New York State accreditation for its trainings as continuing education credits for licensed social workers.

We also have extensive experience in directly helping low-income New Yorkers obtain the public benefits for which they qualify through the **CSS Advocacy, Counseling and Entitlement Services (ACES) Program**. Established in 1984, the ACES Program trains volunteers ages 55 and over to serve as public benefit counselors in community agencies throughout New York City. Last year, ACES volunteers assisted 5,700 clients with 7,800 public benefit issues.

CSS Support of Int. 855-A

CSS supports the City's first step toward reimagining how government thinks about and administers public assistance programs through the proposed Int. 855-A. Because most low-income households qualify for a range of different public benefit programs, creating technology to facilitate the application process and eligibility verification for needs-based benefits, such as Cash Assistance, SNAP, and Medicaid, would be both cost-effective and efficient as it would avoid duplication of efforts and save time for both the consumer and the government entities administering these programs. In promoting access to the full package of benefits for which families qualify, Int. 855-A will help families meet their need for food, medical care, affordable housing and child care. For this reason, CSS supports Int. 855-A's provisions for providing automatic notices to recipients and applicants of one public assistance program when they are likely to qualify for additional programs - specifically, Cash Assistance, the Home Energy Assistance Program (HEAP), Medicaid for the non-MAGI population, and SNAP, all of which are administered by HRA.

In addition, CSS would like to commend HRA for their efforts in simplifying the process of accessing public benefits. HRA has created ACCESS HRA, a useful online tool that can also be downloaded as a

mobile app, which currently allows New Yorkers in need to apply and recertify for SNAP benefits online (with Cash Assistance and child care to be added), to access their case information and submit documents to HRA in a secure way, and to find information about certain government programs.

Furthermore, HRA has been diligent in providing training to service providers on how to use ACCESS HRA so they can in turn help their clients. We believe that the full implementation of ACCESS HRA will help facilitate the success of Int. 855-A.

An Optimal System for Low-Income New Yorkers

We believe that an optimal system should include other public benefits provided by the federal government, the State of New York, and the City of New York. In order for this to be accomplished, all the agencies would need to work closely together, provide access to information, streamline the application process and simplify the language used in the benefits application. While this is indeed a tall order, if effectively implemented, the outcomes for low-income New Yorkers would be consequential.

We also strongly agree with Int. 855-A's provision for individualized assistance for application completion and submission. However, we believe that providing assistance beyond 311 with a dedicated and thoroughly trained staff on all of the available programs is the most effective way to accomplish this vital role. This would be like the work performed by the navigators under the Affordable Care Act (ACA) - individuals or organizations that are trained and able to help consumers as they look for health care coverage options through the Marketplace, including competing eligibility and enrollment forms. We propose that a system such as that which exists for health care be established for public benefits.

Champion for the Expansion of the NY State of Health Marketplace

Finally, we would like to encourage the City Council to work with the New York State Government and become a champion for the expansion of the NY State of Health Marketplace to include non-health public benefits as was originally envisioned. The ACA required states to create an online Marketplace to

streamline the application process for health benefits (qualified health plans, Medicaid, the Essential Plan, the premium tax credit and Child Health Plus); as well as to verify a household's eligibility through electronic data matching with federal, state and local databases. Since the use of web-based tools are the wave of the future, it would be practical, efficient and forward-looking to begin building non-health programs into the Marketplace thus creating a system that would meet the many needs of low-income households and save the government money in the long run.

Thank you for the opportunity to present testimony on behalf of CSS before the Committee.



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**Testimony of Catherine Trapani, Executive Director, Homeless Services United, Inc.
Before the NYC Council Committee on General Welfare
June 27, 2017**

OVERSIGHT – Navigating the Shelter System as a Family with Children

My name is Catherine Trapani, and I am the Executive Director of Homeless Services United (HSU). HSU is a coalition of over 50 non-profit agencies serving homeless and at-risk adults and families in New York City. HSU provides advocacy, information, and training to member agencies to expand their capacity to deliver high-quality services. HSU advocates for expansion of affordable housing and prevention services and for immediate access to safe, decent, emergency and transitional housing, outreach and drop-in services for homeless New Yorkers.

Homeless Service United's member agencies operate hundreds of programs including shelters, drop-in centers, food pantries, HomeBase, and outreach and prevention services. Each day, HSU member programs work with thousands of homeless families and individuals, preventing shelter entry whenever possible and working to end homelessness through counseling, social services, health care, legal services, and public benefits assistance, among many other supports.

HSU recently submitted testimony to this committee regarding progress one year following the 90 day review of homeless services. At that time, we talked about the need for sufficient funding, leadership and, collaboration and coordination with experienced providers to execute the necessary reforms outlined in the 90 day review report, many of which would enhance a family's experience using the shelter system. Today, I am happy to report that following the adoption of the FY2018 budget, we are finally on our way to having sufficient funding to operate shelters to the standards families need and deserve. The other two areas, leadership and collaboration, remain a challenge. If we can address these issues, families would benefit from a system with well-coordinated services where experts in the provider community have both the flexibility and support they need to administer programming that supports families to regain their independence and quickly transition to permanent housing.

FUNDING

DSS has committed to reforming rates for shelter services and has committed \$111 million to FY2018 to do so. Working with each provider of homeless services and reviewing their budgets line by line, DSS and the providers will identify areas where costs have not kept pace with rates paid by the agency and negotiate a new budget that provides sufficient resources to adequately maintain and secure shelters and provide appropriate programming for families and individuals served. In addition, the agency has committed to funding administrative overhead at a level up to 10%, a 2.5% increase over the standard DHS contract. Taken together, these investments will support shelters as they continue to invest in the infrastructure required to offer families in shelter safe, secure, well maintained and appropriately

staffed facilities. HSU would like to thank the administration and the Council for committing this funding to preserve the shelter system and for working with providers to best target these resources.

LEADERSHIP

In some instances, planned initiatives that would support families working to escape homelessness have yet to take shape including those with minimal budgetary implications. Examples of low to no cost initiatives HSU had hoped would be implemented quickly, include targeting rental assistance for youth in DYCD shelters and eliminating the requirement for school aged children to be present at PATH for multiple appointments at intake. With no administrator yet appointed to lead DHS, several vacancies in DHS staff and, the absence of a clear chain of responsibility for the implementation of the myriad of initiatives announced since the 90 day review, progress in these and several other areas has proven elusive. While there may be obstacles to implementing these changes that HSU is not aware of, from the outside, it appears as if the delay is due to a lack of capacity at the agency level to implement the change.

In addition to the above mentioned staff vacancies, there has also been considerable turn over in contracts and program staff at DHS. This turnover has resulted in a loss of institutional knowledge and gaps in operational support for homeless services providers. For the remaining DHS staff, morale is low. People are juggling multiple responsibilities receiving pressure from all sides to overhaul agency operations with limited person-power. A current organizational chart is not publicly available and, while the commissioner has been extremely accommodating to HSU and made himself and his senior staff available to work on many issues facing the sector, homeless service providers would benefit mightily from having partners to work with on day to day operational concerns. **DHS must appoint leaders and continue to develop the internal capacity to manage the many changes in DHS programming and operations and support staff charged with implementing reforms if they are to be successful.**

COLLABORATION AND COORDINATION

Program Operations

Despite the challenges discussed above, DHS has been successful in implementing many positive changes that families using the shelter system should be able to see. The most successful initiatives have been those in which the Department of Social Services (DSS) has worked collaboratively with providers to implement the change. For example, working collaboratively with HSU and our member programs, DSS and the Mayor's Office of Operations streamlined shelter inspections by first piloting and then expanding a coordinated inspection system that allowed shelter providers to work with multiple City agencies to inspect shelters on the same day, consistently record violations and provider corrective action plans and, track repairs using a building compliance system. This work happened alongside a related project to establish new protocols to track "new needs" requests for repair funding to ensure providers have the necessary resources to maintain their properties. While the "new needs" process still isn't perfect, the collaborative spirit of this work has paid off – non-cluster violations are down more than 80% system wide. Once rate reform is fully implemented and providers have maintenance budgets that are sufficient to cover the cost of keeping buildings in good repair, we expect to make even more progress on improving conditions in shelters.

Areas in which there has been less success in implementing reforms often occur when there is a disconnect between ideas and practical issues impacting implementation that could be addressed with

improved collaboration with homeless services providers. This may be due to the lack of staff available at DHS for program management as discussed earlier but, it also may be indicative of an organizational culture that does not consistently support collaboration and provider feedback.

Despite the success of the shelter repair initiative, homeless services providers are not consistently included in the implementation of new initiatives which can lead to a clumsy rollout. For instance, some homeless services programs lack the physical space to accommodate the new program initiatives such as enhanced security or social workers- not all shelters have sufficient space to provide locker rooms and office space for these workers. This doesn't mean these initiatives shouldn't move forward but rather that DSS should work with providers to address obstacles to implementation in advance of roll-out.

More advanced planning, communication, inclusive training, additional resources for additional office space or, repurposing existing space for enhanced social services for clients *even if it would result in having fewer shelter units available for occupancy* would go a long way towards improving the implementation of programmatic reforms.

Daycare and Drop-off Childcare Services

In some instances, well intentioned reforms are not just hard to implement for logistical reasons but, they may wind up having real world consequences for families that City leaders never imagined.

For example, when the Comptroller audited daycare facilities in shelters and found deficiencies and inconsistencies, the administration created a taskforce consisting only of government officials to evaluate and reform the way shelters provide daycare and drop-off childcare services to homeless children. Despite HSU and other providers requesting to participate in the taskforce; no providers or advocacy organizations were invited to participate. A few weeks ago, the administration approached the board of health to propose a number of new regulations designed to ensure drop-off childcare services are of the highest quality. We have no objection to many of the proposed rules, particularly those that would impose standards of care that mirror the high standards our providers set for ourselves regarding child safety. However, the new rules also propose limiting the number of hours families may avail themselves to drop-off child care services to 10 hours per week. If this proposed rule were to take effect, families who are new to shelter and who have not yet set up full time daycare for their children would not be able to use onsite services while they went to appointments to apply for benefits and attend to their family's needs. Parents who need access to childcare services at hours not covered by community providers would also lose access to care as would others who were unable to find open daycare slots in their communities. We do not imagine that the City intended to deprive homeless parents of a vital service but, they failed to consider the impact this limitation would have on families and failed to ask providers or families how such a change would impact them. While there is still time to comment on and influence the proposed changes (and we intend to do so), the City could have spared families and service providers the threat of losing access to services by working collaboratively to find a balance between encouraging families to enroll children in full time, structured programming in the community and, allowing them to use flexible, onsite services when they need it.

Re-housing

Perhaps the most crucial element of an effective homeless services delivery system is having access to robust permanent housing resources. Sadly, the current suite of rental assistance programs (LINC, SEPS, CITYFEPS), Supportive Housing, HPD Section and affordable units and, NYCHA Public Housing have not been able to move families and individuals out of shelter in sufficient numbers. Part of this problem is

simple supply – there are not permanently affordable resources to go around. **The City can and should increase the number of public housing units available to homeless New Yorkers as well as commit more deeply affordable HPD financed housing units to homeless families.** In addition, the City should also partner with homeless services providers to better target existing resources so that clients can be matched with the type of housing assistance most appropriate for their needs so they can exit shelter quickly and, avoid returning to shelter in the future.

The City also pledged to streamline rental assistance programs in the 90-day review and have been told that changes will be announced this summer. We are hopeful that some of the gaps in existing programs will be addressed and that eligibility criteria will be re-aligned to better match with the realities homeless people confront every day so that we can match people with the kinds of housing supports they need to exit shelter quickly and permanently.

Two of the bills being considered this afternoon would address some of the short-comings with the existing suite of rental assistance programs and we hope that they can be adopted and included in the promised reforms that we expect to be unveiled soon.

- Int. 1597 - A Local Law to amend the administrative code of the city of New York, in relation to requiring that the department of homeless services recognize time spent in foster care as homelessness for the purpose of meeting rental voucher eligibility requirements.
 - HSU believes that young people experiencing homelessness should have the same access to housing resources that homeless adults have. Because of the way systems of care are structured, some young people do not qualify for rental assistance programs either because they are not considered homeless even if that is exactly what they are experiencing. This can be because they are living in the “wrong” shelter system (the one operated by DYCD instead of DHS) or because they are in foster care even if they would otherwise be homeless but for their placement in the foster care system. People should not be denied access to assistance because of these kinds of technicalities. The City has already pledged to provide access to housing supports for persons residing in the DYCD shelter system and we are anxiously awaiting the implementation of that reform. Intro 1597 would address the unmet needs of other homeless youth and allow persons aging out of foster care to access the housing supports they need to escape homelessness. HSU supports this introduction.
- Int. 1642- A Local Law to amend the administrative code of the city of New York, in relation to rental assistance vouchers.
 - HSU supports the Council’s efforts to ensure that rental assistance programs are as effective as possible. This includes making sure that rental assistance amounts are set at levels consistent with other, potentially competing programs, such as those administered by the federal government and, that rent levels that mirror market conditions to make sure that families are able to use them to access to quality housing. We therefore support efforts to index assistance levels to “fair market rents”. HSU also supports the idea of creating programs with sufficient flexibility such that they do not have arbitrary time limits but, can be extended for as long as families need the assistance to remain stably housed. Barring any unintended consequences that impact a family’s wellbeing such as eligibility for other vital benefits such as SNAP, HSU supports extending rental assistance to families and individuals who remain at risk of homelessness beyond five years.

OTHER NYC COUNCIL BILLS TO BE CONSIDERED

- Int. 1577 - A Local Law to amend the New York city charter, in relation to establishing an office of case management.
 - HSU supports the use of technology to enhance client services however, we have concerns about privacy implications associated with integrating databases and sharing client information. Some information such as treatment for substance abuse disorders, domestic violence services, HIV-status and, other health information are governed by strict privacy laws designed to protect clients against discrimination and to preserve their rights to privacy and self-determination. While it may be easier to get a comprehensive history of every person we encounter before engaging them in services, doing so takes away a person's ability to decide who has access to their private information and for what purpose. Any integrated case management systems must be carefully designed and include mechanisms to obtain informed consent from clients prior to using such systems. Clients must also be able to retain their right to access shelter even if they are uncomfortable sharing their personal data across systems.
- Int. 855 - A Local Law to amend administrative code of the city of New York, in relation to notification of public assistance eligibility.
 - HSU supports any and all efforts to ensure that eligible New Yorkers know about and are able receive the benefits for which they qualify to help alleviate poverty and escape homelessness.
- Int. 1461- A Local Law to amend the administrative code of the city of New York, in relation to requiring the department of social services to provide customer service training twice per year to all employees that interact with members of the public.
 - HSU agrees that everyone applying for and receiving services at the Department of Social Services (DSS) is entitled to be treated with professionalism and respect. DSS employees work in stressful environments where tensions can run high creating an environment that feels hostile to clients and staff alike. Any training or additional tools that can be afforded to staff that would translate into a better experience for persons receiving services would be welcome. In addition to training, it is also important that other factors that contribute to the customer experience and worker morale such as office design (lighting, condition of waiting areas and offices), average caseload (which impacts wait times and staff ability to return phone calls and process client requests) and office hours also be attended to to maximize the efficacy of any new training programs.
- Int. 1635- A Local Law to amend the administrative code of the city of New York, in relation to HRA job centers.
 - HSU supports this legislation. It is a common sense accountability mechanism that will provide clients with the proof they need to demonstrate that they've complied with DSS program requirements while also providing the administration and Council with the tools they need to properly oversee the work of the Centers and account for the quality of service provided to clients.

CONCLUSION

Homeless Services United recognizes the difficulty in remaking an entire service delivery system – the structural reforms alone require a tremendous amount of effort to achieve – but we hope that the City is willing to meaningfully engage with providers as full partners to realize our shared goal delivering high quality services as efficiently and effectively as possible in order to prevent and reduce homelessness. Thank you for the opportunity to testify.



To: New York City Council Committee on General Welfare Hearing
From: Professor Beth Simone Noveck and Martin Feuerstein-Mendik, The Governance Lab, New York University
Date June 27, 2017
In Re: Intro 855-A: Notification of Public Assistance Eligibility

It is an honor to be asked to testify before you today in support of 855-A “Process of Applying for Assistance.” My name is Professor Beth Simone Noveck. I am the Jerry M. Hultin Global Network Professor at New York University and director of the Governance Lab, a think and do tank that studies and experiments with the use of technology to improve how government makes policies and delivers services. I am also the former Deputy Chief Technology Officer of the United States and head of Open Government in the administration of President Obama.¹

If enacted, the bill has the potential to begin to help New Yorkers most in need of public assistance to receive the benefits for which they are eligible, thus improving their standard of living and lifting them out of poverty or near poverty while, at the same time, eventually decreasing administrative burden and cost to the City.

As I have only a few minutes to address you today, I want to enter into the record a memorandum, dated Dec 17, 2015,² that I collaborated in drafting along with a short article I authored in *Governing* magazine³ dated Aug. 17, 2015, which lay out in greater detail the argument in favor of so-called “automatic benefits” or the use of new technology to simplify the delivery of benefits by reducing information collection. They explain why cutting through red tape could create more efficient, data-driven and humane government. I introduce these into the record also to show that the bill was, in fact, proposed two years ago and was intentionally delayed so as to develop the practical strategy for progressive and incremental implementation included in 855-A.

This bill is important because it is estimated that whereas almost 1.7 million New Yorkers receive SNAP benefits, that number represents only 72.5% of those who are eligible.⁴ That means approximately 600,000 New Yorkers are eligible to receive SNAP but are not enrolled.

¹ Noveck, Beth Simone. *The GovLab*, <http://www.thegovlab.org/beth-noveck.html>

² Kallos, Ben. “Automatic Benefits: Using Government Data to Deliver Better Citizen Services for Less,” December 17, 2015; <https://drive.google.com/file/d/0B9QNTbv5hBDdaEpUSWZfbVRqZDlxN2dlRWxJaUFXdktmMIRr/view?usp=sharing>

³ Noveck, Beth Simone. “Automatic Benefits: Reducing Red Tape, Improving Lives,” *Governing*, August 17, 2015; <http://www.governing.com/blogs/bfc/col-automating-benefits-efficiency-tax-filing-service-delivery.html>

⁴ “Supplemental Nutrition Assistance Program – Access and Participation Rates for 2002-2015,” *New York City Human Resources Administration*, <https://www1.nyc.gov/assets/hra/downloads/pdf/facts/snap/2002.2015NYCSNAPParticipation.pdf>



Beyond SNAP, hundreds of thousands of New Yorkers are likely unaware of the many smaller benefits to which they might be entitled, such as Access-A-Ride, summer work for youth, and free tax prep.

We need to reduce the burden and the stigma involved in obtaining benefits. By requiring the use of data that government already collects to simplify the process of determining if public assistance recipients qualify for additional forms of public assistance at the time that they apply for one benefit and pre-filling forms using information already provided, the bill takes an important first step toward a thorough reimagining of how government thinks about and administers public assistance programs.

If you pass this bill, New York would simply be taking steps to catch up with other states like Louisiana, where the Department of Health recently received unique permission from the Centers for Medicare and Medicaid Services to enroll SNAP participants in expanded Medicaid. The logic behind this program is that financial eligibility constraints for the two programs are virtually identical. Out of Louisiana's almost 900,000 SNAP recipients, the Department of Health was able to identify 105,000 people they would be able to enroll in Medicaid via existing information obtained from SNAP. Unlike existing SNAP waiver programs, this system allows the state to use the SNAP information to determine which individuals or families are certain to be eligible for Medicaid and do not require a separate confirmation process for the additional benefit. Unlike Express Lane Eligibility (ELE), this process can be used to enroll adults. The Department of Health sent offer letters which contained four yes-or-no questions that needed to be answered in order to enroll the individuals in Medicaid. With an expected response rate of 50%, the Department of Health estimated that they could save the state approximately \$1.5 million in administrative costs.⁵

From 2011-2013, South Carolina was able to process about 48% of the renewals through the "automatic" option in ELE. From September 2012 through June 2013, they were able to enroll nearly 100,000 children in Medicaid through the ELE process. They also saved about \$1.6 million per year in administrative costs.⁶ New York State also uses ELE by enrolling children in Medicaid if they are on CHIP in Medicaid and satisfy the income qualifications. The process is automatic but there does not appear to be any statistics on how many people this program has served.⁷

⁵ Gee, Rebekah E. "Louisiana Receives Approval for Unique Strategy to Enroll SNAP Beneficiaries in Expanded Medicaid Coverage," *Louisiana Department of Health*, June, 1, 2016; <http://dhh.louisiana.gov/index.cfm/newsroom/detail/3838>

⁶ Hoag, Sheila. "CHIPRA Mandated Evaluation of Express Lane Eligibility: Final Findings," *Mathematica Policy Research*, December 2013; <https://aspe.hhs.gov/system/files/pdf/177291/ELE%20Final%20Report%20to%20ASPE%2012%2011%2013.pdf>

⁷ "Transitioning Children from Child Health Plus to Medicaid Using Express Lane Eligibility," *New York State Department of Health*, May 14, 2012; https://www.health.ny.gov/health_care/medicaid/publications/adm/12adm2.htm



In California, recipients of Medi-Cal, the state's Medicaid program, are automatically enrolled in the CalWORKS cash-assistance program. Finally, across the country, individuals who are receiving Social Security retirement benefits are automatically enrolled in Medicare when they turn 65.

Implementation: Getting From Here to There

Applications for SNAP, Medicaid, Cash Assistance and various other benefits range from ten to fifteen pages each. These applications ask for much of the same information, including income information, household composition and living arrangements, but each in slightly different ways. For example, the income section on each application asks essentially the same questions but the sections are formatted differently. Some ask for more detailed information in particular categories (for example, the Low Income Home Energy Assistance Program application asks a lot of questions about heat and utility arrangements).

The upside to this proposed program is its potential to enroll many people in programs they either thought they were ineligible for or did not know existed. While it is worth noting that when states enacted the “simplified application” option in ELE, the response rate was still between 5-13 percent,⁸ the process envisioned by this legislation is different. Rather than sending applications by mail, it allows these pre-filled applications to be sent electronically, which should increase uptake and decrease costs.

In addition, this legislation allows the process to be used for renewals as well as initial enrollments. This is where this program is likely to have the greatest impact as it will make the renewal process much easier for many people who are already in the system. But it is important that the implementation of the bill be complemented by testing and evaluation of experiments to increase uptake of services, such as the work Public Policy Lab is undertaking to test the viability of benefits enrollment at public schools or the Behavioral Insights testing of simplified processes to become an organ donor in Ontario.

I believe Intro 855-A can be an effective first step towards the larger goal of automation in the process of receiving public benefits. Given that all the city’s forms can easily be made available in downloadable form, it is a relatively simple matter for the city to create, or invite others to

⁸ Hoag, Sheila. “CHIPRA Mandated Evaluation of Express Lane Eligibility: Final Findings,” *Mathematica Policy Research*, December 2013; <https://aspe.hhs.gov/system/files/pdf/177291/ELE%20Final%20Report%20to%20ASPE%2012%2011%2013.pdf>



create, form filling tools and develop “one stop” universal applications that gather information a single time and distribute it, as needed, to different agencies to facilitate the application process for diverse services. It will then be both possible and legal to automate the process to a greater extent by enabling people who have filled out one form to automatically qualify for the benefits to which they are entitled----- a process which is contemplated by Executive Order 13563, which provides that federal agencies promote coordination, simplification and harmonization in order to reduce regulatory requirements that may be redundant, inconsistent or overlapping, and by a subsequent White House Memorandum intended to facilitate coordination and collaboration as well as streamline agency requirements among federal agencies, states and localities.⁹

Thank you to the Committee on General Welfare for having me.

⁹ President Barack Obama. “White House Memorandum for the Heads of Executive Departments and Agencies: Administrative Flexibility, Lower Costs, and Better Results for State, Local, and Tribal Governments,” February 28, 2011 designating the Director of the Office of Management and Budget (OMB) to lead a process with the Chief Information Officer of OMB and the Chief Technology Officer of the Office of Science and Technology Policy to facilitate the coordination and collaboration as well as streamline agency requirements among federal agencies, states and localities.



MEMORANDUM

From: Ben Kallos, New York City Council Member, Chair of Governmental Operations
Beth Noveck, Governance Lab at New York University
Daniel Stein, Stewards of Change
Steven Lee, Robin Hood Foundation

Date: December 17, 2015

Subject: Automatic Benefits: Using Government Data to Deliver Better Citizen Services for Less

Inspiration

“I want us to ask ourselves every day, how are we using technology to make a real difference in people’s lives.” — President Barack Obama¹

Executive Summary

We have the opportunity to help state and local governments dramatically improve the services they provide to citizens while saving money, if it acts to create and support implementation of the policy framework to enable “automatic benefits.” Accomplishing these goals is now possible due to (1) the significant advancements in technology and responsible information sharing, and (2) leveraging open government data, to make data held by government reusable and accomplish the following priorities:

- **Universal Application** - qualifies citizens for all the human services to which they are entitled based on the completion of a single form.
- **Automatic Renewal** – renews people for services rather than depending upon them to reapply.
- **Automatic Benefits** - use open government data (IRS, SSA, Human Services, etc.) to means test eligibility and automate the process of determination in order to deliver services for which people are eligible automatically.

We can advance automatic benefits at the federal, state and local level and create a lasting legacy for more open and effective government by:

- 1. Challenge the States to Use Existing Funding** - The Federal government can lead the states by publicly challenging governors to use Affordable Care Act funding available until 2018 to reduce bureaucracy and waste by removing unnecessary paper work and rules in order to provide human service benefits to those who need them.
- 2. Integrate Automatic Benefits into Healthcare Exchanges** - Upgrade HealthCare.gov so that applicants for health insurance are also screened, qualified and awarded all the other human services citizens qualify for in order to give them the comprehensive care they need to stay healthy.

3. Challenge the Private and Non-Profit Sector - Issue a challenge to states and locals to make the business rules underlying benefits decisions freely available as open data and invite the private and non-profit sector to innovate in delivery of government benefits, including by creating new kinds of eligibility apps.

4. Super Waiver – seeking a blanket waiver of any bureaucratic rules, identified below, that stand in the way of granting benefits to people who need them and following the framework laid out by automatic benefits legislation introduced in New York City.ⁱⁱ

President Obama has already laid the groundwork for “automatic benefits” through the Affordable Care Act, Executive Order 13563, Executive Memorandum, waivers, guidance and funding for each state to use *integration* and *interoperability* to improve delivery of federally-assisted human service benefits to their residents by leveraging information sharing across human service agencies to automatically recertify or provide benefits. Across the nation, states including California, Louisiana, North Carolina, Pennsylvania, and New York have begun to implement one stop websites for multi-benefit screening and application, online and mobile phone apps for self-service case management and updates, eligibility systems and business rule engines (BREs), electronic evidence imaging, and electronic data matching to provide benefits automatically.

Automatic benefits have the advantage of decreasing interaction with bureaucracy and making government more efficient, effective, and humane. But without intervention, a handful of states may build automatic benefits with governors claiming credit individually, but the vast majority will miss the 2018 deadline, leaving much of America without the benefits they need.

Introduction

Government has a unique window of opportunity to modernize in the next two years with a “no wrong door” approach that will create a seamless experience for citizens so that they receive increasing amounts of government service through minimal interaction with bureaucracy. Whether this happens in the next two years, or we miss it for a generation, is a question of whether someone provides a vision to organize state governments to innovate with the software and systems necessary to provide automatic benefits.

President Obama has already laid the groundwork for “automatic benefits” through mandates for *integration* and *interoperability* in the Affordable Care Act, Executive Order 13563, Executive Memorandum, waivers, demonstrations along with guidance and funding provided to states for implementing new systems capable of serving all federally-assisted human service benefits.

Tasked with leading this effort the Administration for Children and Families at the Department of Health and Human Services, has provided vision, funding, illustrations of key features, and legal frameworks clarifying that confidentiality requirements *do not preclude* information sharing among government agencies in order to determine eligibility among human services such as child welfare, child support, child care, TANF, LIHEAP, and SNAP automatically.

Following ACF/HHS funding and guidance towards interoperability, states across the nation have begun to implement client portals for multi-benefit screening and application, online and mobile phone apps for self-service case management and updates, eligibility systems and business rule engines (BREs), electronic evidence imaging, and electronic data matching to provide benefits automatically.

Existing programs provide models such as SNAP CAP demonstrations in more than one third of the states where some states are providing preloaded SNAP EBT cards to seniors who live alone and receive SSI, which has led to the highest participation rates in the country. In the private sector Intuit’s TurboTax has already built “automatic benefits” as “Benefits Assist,” Food Bank NYC’s VITA already completes SNAP applications, and even the IRS is sending notices for EITC, all of them seeking to provide government benefits using tax information.

“Automatic Benefits” legislation proposed by New York City Council Member Ben Kallos provides a framework for using a combination of tax information, screened application information, and existing government information to provide government benefits to residents, at first through a universal application, notifications and pre-filled forms then eventually automatically without need for further application or recertification.ⁱⁱⁱ “Automatic Benefits” is already a reality in piece meal and simply provides codification and a vision for a comprehensive approach to seamlessly providing government benefits.

Government at all levels can catalyze implementation through waiver, publicly challenging states and ensuring funding is used by to build interoperable systems, building the system at a federal level and giving it away to states, or working with the private sector to innovate and quickly provide human service benefits people need automatically.

Executive Order, Memorandum and Affordable Care Act Mandate and Funding for Interoperability and Integration

On January 18, 2011, President Barack Obama issued Executive Order 13563, “Improving Regulation and Regulatory Review,” which received attention largely around Section 6, “Retrospective Analyses of Existing Rules,” which is projected to save \$10 billion,^{iv} whereas Section 3, “Integration and Innovation,” provides an initial roadmap for “automatic benefits:

Some sectors and industries face a significant number of regulatory requirements, some of which may be redundant, inconsistent, or overlapping. Greater coordination across agencies could reduce these requirements, thus reducing costs and simplifying and harmonizing rules. In developing regulatory actions and identifying appropriate approaches, each agency shall attempt to promote such coordination, simplification, and harmonization.

A White House Memorandum that followed one month later President Obama provided for “Administrative Flexibility, Lower Costs, and Better Results for State, Local, and Tribal Governments,” facilitating the coordination and collaboration as well as streamline agency requirements among federal agencies, states and localities.^v

Funding to build interoperability systems was passed as part of the Affordable Care Act, resulting in a waiver of OMB Circular A-87, which would otherwise require cost allocation, allows states to receive 90% reimbursement across all human services through December 2018. Guidance from Health and Human Services and the United States Department of Agriculture followed on August 10, 2011 and January 23, 2012, advised states and localities of this funding, that they could integrate eligibility and provided an enumerated list of features that would be funded including application portals, data warehouses for case record imaging, outreach and verification, rules engines, and automation.

The Affordable Care Act’s Section 1561, required HHS in consultation with the in consultation with the Health Information Technology (HIT) Policy Committee and the HIT Standards Committee, to develop interoperable and secure standards and protocols that facilitate electronic enrollment of individuals in Federal and State health and human services programs.^{vi} The recommendations included making eligibility rules public in human and computer readable standards^{vii} and using health insurance coverage determinations to support eligibility and application for other human services such as SNAP and TANF.^{viii}

President Barack Obama, the Affordable Care Act and HHS have laid the ground work for “automatic benefits” through Executive Order, memorandum, guidance and even funding that will expire in December of 2018. This presents a narrow window of time to build interoperability across all 50 states, one that if missed could take another generation to implement. There is nothing standing in the way and the Federal government must publicly challenge and lead the states so that they in building interoperable systems to provide automatic benefits.

Regulations Waived to Improve and Integrate Access to Benefits

Previous administrations^{ix} have promulgated bureaucratic rules that exceeded the mandates of laws and remain on the books by virtue of institutional inertia. Many of these rules and regulations have been waived for as many as two dozen states and in most cases, at least a half dozen. Counterintuitively more political conservative states such as New Mexico, Arizona and Oklahoma are leading the nation. Waivers have focused on eliminating costly and time consuming “live” in-person interviews for application^x and recertification^{xixii} for the elderly and the disabled in favor of over the phone through on-demand^{xiii} and interactive voice response^{xiv} as well as online. In addition states have moved toward using automatic identity verification^{xv} and electronic notification^{xvi} through email. Rather than a piecemeal, state by state approach, the Federal government should issue a 50 state waiver for all regulations that have already been waived for one state (see endnotes for specific regulations to be waived) and begin the process of repealing those regulations in favor of regulations requiring integration and interoperability to facilitate automatic benefits.

Interoperability & Data Sharing Mandated & Permitted by Federal Law & Regulations

Coordinated care and integrated case management can improve the overall health and well-being of individuals.^{xvii} Better outcomes mean healthier, safer, stabilized individuals and families with a better chance of sustaining self-sufficiency and long-term personal success, which, in turn, reduces costs to the state and local governments.^{xviii} The Administration for Children and Families (ACF) developed a Confidentiality Toolkit to help jurisdictions successfully navigate the delicate balance between privacy and security with the delivery of efficient and effective services between the following programs:^{xix} Child Welfare, Child Care, Temporary Assistance for Needy Families (TANF), Child Support, Low Income Home Energy Assistance Program (LIHEAP), and the Supplemental Nutrition Assistance Program (SNAP).^{xx}

- **Child Welfare** – While Federal laws^{xxi} require confidentiality, they do not prohibit and in many cases provide for or mandate information sharing,^{xxii xxiii xxiv} and in fact require automated child welfare information systems^{xxv} with funding for linking agencies for provision of comprehensive services.^{xxvixxvii}
- **Child Support** – while broad data sharing of information is mandated for child support collection^{xxviii} with statewide automated data processing,^{xxixxxx} the data is mandated to go in to the system, but largely cannot come out,^{xxx1} however since this data must be shared with one agency, it can also be shared with others.
- **Child Care** – unlike other federal human service laws and regulations, issues of confidentiality and information sharing are absent,^{xxxii} with block grants empowering the states.^{xxxiii} Best practices from many states set thresholds that relate to other benefits like SNAP; link to benefits like TANF, SNAP and Medicaid; use other early care and education programs such as Head Start, Pre-K to determine gaps and comprehensive service availability; and manage licensing and quality rating.^{xxxiv}
- **Temporary Assistance for Needy Families (TANF)** – Since replacing Aid to Families with Dependent Children (AFDC) in 1996, TANF provides broad flexibility to states for implementation with requirements for data sharing^{xxxv} and penalties for failure to participate in an income and eligibility verification system (IEVS)^{xxxvi} across other benefits.

- **Low-Income Home Energy Assistance Program (LIHEAP)** – confidentiality and information sharing is absent from this program’s laws and regulations,^{xxxvii} with categorical eligibility flexibility to serve households where at least one member is receiving SNAP, TANF, or SSI.^{xxxviii} States must coordinate this program with child welfare programs and Social Security, may apply policies consistent with TANF, but otherwise have broad flexibility.^{xxxix}
- **Supplemental Nutrition Assistance Program (SNAP)** – food is a primary need and integral to all other services which is why a joint application is mandated with TANF, though a selective application is allowed, with privacy protections for applicants but mandates for information sharing with other “federally-assisted state programs providing assistance on a means-tested basis to low income individuals” and integration with income and eligibility verification systems (IEVS) used by other programs such as TANF.^{xi}

Throughout all of the above programs, confidentiality does not preclude data sharing and in fact a mandate for data sharing exists for many of the programs. In all cases the Privacy Act of 1974 is easily satisfied by adding notification and consent for sharing information between agencies.^{xli}

Automatic Benefits in State and Local Government

Since 1997, federal law has required SSA to offer the opportunity to file SNAP applications while at the SSA office, leading to partnership with Food and Nutrition Services (FNS) to create Combined Application Projects (CAP) demonstrations in 18 states as of 2013, using one of two approaches, a standard model of seeking additional information in SSA interviews to complete the SNAP application or a modified model using information from SSA to automatically determine eligibility for single member households, which in some states includes mailing an pre-loaded EBT card along with SSI benefits.^{xlii} In all cases, SNAP uptake increased, with the highest enrollment from the modified model where pre-loaded EBT cards are provided automatically.^{xliii}

The Children’s Health Insurance Program Reauthorization Act allowed for Express Lane Eligibility (ELE) that uses data from SNAP to automatically enroll individuals into health insurance programs. The most progressive ELE programs, such as in Louisiana, automatically send health insurance cards to those eligible and allow them to start coverage immediately by using their card.^{xliiv} The administration just made the Fast Track Medicaid program permanent, allowing states to use a similar SNAP match to automatically enroll individuals into MAGI Medicaid. Seven states have implemented this option, and all states that expanded Medicaid should be encouraged to take advantage of this option.^{xliiv} Broad based implementation of Fast Track would help millions of eligible individuals quickly and seamlessly gain access to healthcare.

California launched the California Welfare Information Network (CalWIN) with a coalition of 18 counties, to manage welfare to work, Medicaid, SNAP, child welfare and other assistance programs with an integrated approach that shares data across agencies provides for online case management with a web and mobile phone app that allows residents to apply, see current benefits, recertify and update their profile online.^{xlivi}

New York City offers an online application for more than 30 government benefits and information sharing across 9 city human service agencies.^{xlvii} New York State announced the creation of an “Integrated Eligibility System” in partnership with an Anti-Hunger Task Force that will provide a “no wrong door” approach that uses in-person, phone and online intervention to capture information once in order to provide the answers and assistance people need.^{xlviii}

A survey of eleven states including Alabama, New Mexico, Kentucky, Oklahoma, Virginia and others, found broad implementation using Affordable Care Act funding for interoperability among human services using a waiver of OMB Circular A87 cost allocation to provide: client portals for multi-benefit screening and application, online and mobile phone app self-service case management and updates, eligibility systems and business rule engines (BREs), electronic evidence imaging, electronic data matching to provide benefits automatically.^{xlix}

Private Sector Screening Individual for Benefits Using Taxes

Intuit’s TurboTax has already built “automatic benefits” as “Benefits Assist” to provide government benefits using tax information and is poised to expand as a strong partnership between the public and private sectors. H&R Block has already tested using their tax preparers to screen and fill out benefits applications. Even the IRS is providing notifications for benefits. Tax based benefits screening are already a reality in piece meal and ready to become comprehensive. Taxpayer consent is allowed by the IRS to provide sharing by tax preparers of tax information.¹

This year Intuit’s TurboTax began processing 30.7 million consumer Federal tax returns,^{li} nearly 10% of the United States population,^{lii} many of whom were screened for Supplemental Nutrition Assistance Program (SNAP) using “Benefits Assist” in all 50 states during the month of January, before the system was shut down by request of the government. Intuit used tax information to screen applicants to receive additional questions which were used to electronically fill paper applications for each locality then submit them through facsimile.^{liii} The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) issued guidance that determined TurboTax’s electronic SNAP application to be valid and required that they be processed.^{liv} This year, Intuit plans to try again with the addition of digital supporting document submission by text message and an expansion from SNAP to include FCC Lifeline eligibility in cooperation of 35 states lead by early adopters Arizona and Missouri.

H&R Block and TaxAct each file 7 million tax returns annually.^{lv} In 2007, H&R Block participated in a study where certain tax payers were provided with one of several interventions including: educational materials on SNAP, notification that they were eligible for SNAP along with an application, or having their forms completed and submitted by a professional tax preparer.^{lvi} The results showed a 22% increase in application rates for tax payers who received notification and a blank or pre-filled application which nearly doubled to 40% when applications were filled and submitted by professional.^{lvii}

The Internal Revenue Service (IRS) provides a CP09 or CP27 notification to tax payers who fail to claim their Earned Income Tax Credit (EITC) of which 41% sign, return them and receive a check. In 2010 the IRS sent a second notice using different envelopes and different notices that varied from resending the standard form to a more complex form as well as including

indemnification, estimated time to complete, or including an estimated tax credit amount as low or high.^{lviii} The results found a 22% increase from the second intervention that included simplifying the notification and including the potential benefits.

Volunteer Income Tax Assistance (VITA) provides free income tax preparation for low-income Americans in all 50 states through a matching grant program administered by the IRS, first appropriated by the 110th Congress in December 2007, and re-appropriated each year thereafter.^{lix} One of the largest VITA providers is Food Bank for New York City which has provided the service since 2002 and completed 85,000 tax returns in 2014, screening them for SNAP, resulting in approximately 11,000 new enrollments.

Government has an opportunity to work with private sector for-profit and non-profit companies that have more flexibility and can innovate the use of tax information for providing benefits automatically.

Conclusion

President Obama has already laid the groundwork for “automatic benefits” through the Affordable Care Act, Executive Order 13563, Executive Memorandum, waivers, guidance and funding for each state to use *integration* and *interoperability* to improve delivery of federally-assisted human service benefits to their residents by leveraging information sharing across human service agencies to automatically recertify or provide benefits. Across the nation, states including California, Louisiana, North Carolina, Pennsylvania, and New York have begun to implement one stop websites for multi-benefit screening and application, online and mobile phone apps for self-service case management and updates, eligibility systems and business rule engines (BREs), electronic evidence imaging, and electronic data matching to provide benefits automatically.

We can advance automatic benefits at the federal, state and local level and create a lasting legacy for more open and effective government by:

1. Challenge the States to Use Existing Funding - lead the states by publicly challenging governors to use Affordable Care Act funding available until 2018 to reduce bureaucracy and waste by removing unnecessary paper work and rules in order to provide human service benefits to those who need them.

2. Integrate Automatic Benefits into Healthcare Exchanges - upgrade HealthCare.gov so that applicants for health insurance are also screened, qualified and awarded all the other human services citizens qualify for in order to give them the comprehensive care they need to stay healthy.

3. Challenge the Private and Non-Profit Sector - issue a challenge to states and locals to make the business rules underlying benefits decisions freely available as open data and invite the private and non-profit sector to innovate in delivery of government benefits, including by creating new kinds of eligibility apps.

4. Super Waiver - granting a blanket waiver of any bureaucratic rules, identified below, that stand in the way of granting benefits to people who need them and following the framework laid out by automatic benefits legislation introduced in New York City.^{lx}

Automatic benefits have the advantage of decreasing interaction with bureaucracy and making government more efficient, effective, and humane. But without intervention, a handful of states may build automatic benefits with governors claiming credit individually, but the vast majority will miss the 2018 deadline, leaving much of America without the benefits they need.

ⁱ Barack Obama, "Remarks by The President at Opening Session of the Forum on Modernizing Government," The White House Office of the Press Secretary, January 14, 2010 available at <https://www.whitehouse.gov/the-press-office/remarks-president-opening-session-forum-modernizing-government>

ⁱⁱ Ben Kallos, "Introduction 855 of 2015: A Local Law to amend administrative code of the city of New York, in relation to requiring the human resources administration/department of social services to use income tax filings to determine eligibility for public benefits," New York City Council, July 23, 2015 available at <http://benkallos.com/legislation/introduction-855-2015-automatic-benefits>

ⁱⁱⁱ *Id.*

^{iv} Council of Economic Advisers, Executive Office of the President, "Smarter Regulations Through Retrospective Review," May 10, 2010 available at https://www.whitehouse.gov/sites/default/files/lookback_report_rev_final.pdf

^v President Barack Obama, "White House Memorandum for the Heads of Executive Departments and Agencies: Administrative Flexibility, Lower Costs, and Better Results for State, Local, and Tribal Governments," February 28, 2011 *designating* the Director of the Office of Management and Budget (OMB) to lead a process with the Chief Information Officer of OMB and the Chief Technology Officer of the Office of Science and Technology Policy to facilitate the coordination and collaboration as well as streamline agency requirements among federal agencies, states and localities.

^{vi} Administration for Children and Families, Health and Human Services, "Your Essential Interoperability Toolkit: An ACF/HHS Resource Guide," July 2012 available at http://www.acf.hhs.gov/sites/default/files/assets/acf_toolkit_july_2012_final.pdf hereinafter "*Interoperability Toolkit.*"

^{vii} *Interoperability Toolkit* at 28 *citing* Recommendation 3.2.

^{viii} *Interoperability Toolkit* at 28 *citing* Recommendation 2.1.

^{ix} Federal Register, Volume 59, No. 110, June 9, 1994 and Federal Register, Volume 59, No. 235, December 8, 1994 noticing 7 CFR 272.2 et seq.

^x 7 C.F.R. 273.14(b)(3) waived in 7 states including New Mexico and Oklahoma to eliminate the interview for expedited applications.

^{xi} 7 C.F.R. 273.2(e)(2) & 273.14(b)(3) waived in 23 states including New Mexico and Oklahoma to eliminate in-person interviews in favor of recertification by phone or online.

^{xii} 7 C.F.R. 273.2(e)(2) & 273.14(b)(3) waived in 6 states to eliminate the "live" interview for recertification of elderly and disabled.

^{xiii} 7 C.F.R. 273.2(e)(3) & 273.14(b)(3) waived in 11 states including Arizona to provide on demand telephone interviews.

^{xiv} 7 C.F.R. 273.14(b)(3) waived in 6 states including New Mexico to allow Interactive Voice Response (IVR) for elderly and disabled.

^{xv} 7 CFR 273.2(f) waived in 8 states including Arizona to allow automated identity verification through third party applications such as Lexis Nexis.

^{xvi} 7 CFR 273.2(c)(5), (e)(3); 273.10(g)(1),(2); 273.12(c)(3)(i); 273.13(a)(3); 273.14(b)(1); 273.18(e)(3)(i)-(vi), (e)(4)(i)-(ii),(g)(2) waived in 10 states including Arizona to allow for electronic notices.

^{xvii} Administration for Children and Families, "Confidentiality Toolkit: A resource tool from the ACF Interoperability Initiative," August 2014 available at https://www.acf.hhs.gov/sites/default/files/assets/acf_confidentiality_toolkit_final_08_12_2014.pdf hereinafter "*Confidentiality Toolkit*"

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- ^{xviii} *Confidentiality Toolkit*.
- ^{xix} *Confidentiality Toolkit*.
- ^{xx} *Confidentiality Toolkit*.
- ^{xxi} *Confidentiality Toolkit* at 27-28 citing CAPTA; Child and Family Services Improvement and Innovation Act; Fostering Child Welfare Connections to Success and Increasing Adoptions Act; title IV-B (Child Welfare Services and Promoting Safe and Stable Families), title IV-E (Federal Payments for Foster Care and Adoption Assistance), and, title XX (Block Grants to States for Social Services) of the Act.
- ^{xxii} *Confidentiality Toolkit* at 18 citing Child Abuse Prevention and Treatment Act (CAPTA) section 106(b)(2)
- ^{xxiii} *Confidentiality Toolkit* at 20 citing Office of Child Support Enforcement and the Children’s Bureau, “Information Memorandum (IM-12-06),” August 1, 2012, that provides information on how State child support and child welfare agencies can improve their work, including through electronic data exchanges between child welfare and child support information systems.
- ^{xxiv} 42 U.S.C. §671(a)(8)(C) “State plan for foster care and adoption assistance. Requisite features of State plan. In order for a State to be eligible for payments under this part, it shall have a plan approved by the Secretary which ... provides safeguards which restrict the use of or disclosure of information concerning individuals assisted under the State plan to purposes directly connected with ... the administration of any other Federal or federally assisted program which provides assistance, in cash or in kind, or services, directly to individuals on the basis of need...”
- ^{xxv} *Confidentiality Toolkit* citing requirements for Statewide Automated Child Welfare Information Systems (SACWIS) The Act and/or implementing regulations at 45 CFR 1355.53(b)(2) states that, to the extent practicable and appropriate, the state should provide for electronic exchanges and referrals with other data collection systems including TANF, Medicaid, child support, and the National Child Abuse and Neglect Data System (NCANDS). At the same time, it does not specifically discuss interoperability or incorporating interoperable standards developed and maintained by inter-governmental partnerships.
- ^{xxvi} Child Abuse Prevention and Treatment Act (CAPTA) provides for confidentiality but does not prohibit information sharing among government agencies and provides CAPTA funding through HHS to states for linking child welfare agencies with the provision of services through other agencies.
- ^{xxvii} Child and Family Services Improvement and Innovation Act, Title IV-B, Section 437(f), allows HHS to award grants to regional partnerships that provide integrated activities, data interoperability and services that are designed to increase the safety, permanency and well-being of children who are in an out-of-home placement as a result of a parent’s or caretaker’s substance abuse.
- ^{xxviii} *Confidentiality Toolkit* at 32.
- ^{xxix} *Confidentiality Toolkit* at 32 stating “the state’s plan for child support must include certain information sharing with TANF, Foster Care, Medicaid, and SNAP.”
- ^{xxx} *Confidentiality Toolkit* at 32 citing 42 U.S.C. § 666(c)(1)(D)(i) in stating “It is important to note that the child support statute clearly states that the child support system shall have access to records of other state and local government agencies, including: vital statistics; tax and revenue records; real and titled personal property; occupational and professional licenses; ownership and control of corporations, partnerships, and other business entities; employment security records; public assistance programs; motor vehicle department; and corrections”
- ^{xxxi} *Confidentiality Toolkit* at 32
- ^{xxxii} *Confidentiality Toolkit* at 36 citing Child Care and Development Block Grant, 42 USC §658.
- ^{xxxiii} *Confidentiality Toolkit* at 36-37 citing The Privacy Act of 1974, 5 USC §552a, as amended, may prevent certain sharing of information without consent or memorandum.
- ^{xxxiv} *Confidentiality Toolkit* at 36
- ^{xxxv} *Confidentiality Toolkit* at 29 citing Social Security Act, Sections 408(a)(2) and 408(a)(3) and 45 CFR 264.30
- ^{xxxvi} *Confidentiality Toolkit* at 29 citing Social Security Act, Section 1137, 42 U.S.C. § 1320b-7.
- ^{xxxvii} *Confidentiality Toolkit* at 40-41 citing Home Energy Grants, 42 USC §8621 and The Privacy Act of 1974, 5 USC §552a, as amended, which requires consent of the individual whose information is shared and memorandum between agencies.
- ^{xxxviii} *Confidentiality Toolkit* at 40 and Office of Community Services, Administration for Children and Families, U.S. Department of Health and Human Services, “LIHEAP Service Eligibility FY 2014,” September 17, 2013 available at <http://www.acf.hhs.gov/programs/ocs/resource/liheap-eligibility-criteria>
- ^{xxxix} *Confidentiality Toolkit* at 40

^{xi} *Confidentiality Toolkit* at 42 -44 citing Supplemental Nutrition Assistance Program, 7 U.S.C. §§ 2011-2036a; 7 CFR Parts 271-285 noting notification of information should be provided to applicants.

^{xlii} *Confidentiality Toolkit*.

^{xliii} Stan Dorn, Sarah Minton, and Erika Huber, "Integrating Health and Human Services Programs and Reaching Eligible Individuals Under the Affordable Care Act," The Urban Institute prepared for Alana Landey, Office of the Assistant Secretary for Planning and Evaluation, DHHS, July 21, 2014 at 34 available at <http://aspe.hhs.gov/report/examples-promising-practices-integrating-and-coordinating-eligibility-enrollment-and-retention-human-services-and-health-programs-under-affordable-care-act> citing Food and Nutrition Service (FNS), *2013 Program Access Toolkit*. March 2013 listing Arizona, Florida, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Mississippi, New Jersey, New Mexico, New York, North Carolina, Pennsylvania, South Carolina, South Dakota, Texas, Virginia, and Washington.

^{xliiii} *Id* at 19.

^{xliiv} Hensley-Quinn, M., Henderson, M. and Mooney, K. (2012). "State Experiences with Express Lane Eligibility: Policy Considerations and Possibilities for the Future." State Health Reform Assistance Network. Available at http://www.rwjf.org/content/dam/farm/reports/issue_briefs/2012/rwjf403808

^{xliiv} Wachino, V. (2015). "Policy Options for Using SNAP to Determine Medicaid Eligibility and an Update on Targeted Enrollment Strategies." U.S. Department of Health & Human Services, Centers for Medicaid & Medicare Services. Available at: <http://www.medicaid.gov/Federal-Policy-Guidance/downloads/SHO-15-001.pdf>

^{xliiv} *Confidentiality Toolkit* at 48 and Alameda County Social Services Agency, "Information Services," available at http://www.alamedasocialservices.org/public/departments/agency_administration/information_services/index.cfm

^{xliiv} *Confidentiality Toolkit* at 50.

^{xliiii} Governor Andrew Cuomo, "2015 Opportunity Agenda," January 2015, at 191-192, available at https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/2015_Opportunity_Agenda_Book.pdf stating

1. Economic Opportunity for All New Yorkers. 92. Re-envision Human Service Information Technology.

Human Service Information Technology systems are a series of separate and mostly antique data bases that track well-being, safety and appropriate fiscal actions for New Yorkers receiving Government assistance. The Anti-Hunger Task Force found that these outdated systems can create barriers to individuals and families accessing all of the benefits for which they are eligible. Leveraging Federal funds that incentivize system modernization, the state is embarking on a massive overhaul, bringing many separate systems up to one single standard, with common interoperability and reporting capabilities. This "Integrated Eligibility System" will vastly improve client experience, the ability of workers to assist, system maintenance and reforms, and policy planning through robust data reporting.

The Anti-Hunger Task Force understands that hunger may co-present with a myriad of other human service needs. They recommend the "no wrong door" approach to this technology modernization effort- so that no matter what inquiry is presented, or which mechanism of presenting is used (in person, by telephone or through electronic application) the information technology is smart - capturing critical information once, and routing people to the right answers for their needs.

^{xlix} Teri Shaw, Lucy Streett, Shelby Gonzales and Dottie Rosenbaum, "State Innovations in Horizontal Integration: Leveraging Technology for Health and Human Services," Social Interest Solutions and Center of Budget and Policy Priorities, March 24, 2015 available at <http://www.cbpp.org/sites/default/files/atoms/files/3-23-15fa.pdf>

ⁱ Internal Revenue Service, "Section 7216 Frequently Asked Questions," citing 26 U.S.C. §7216, Treas. Reg. §301.7216-3(a)(3), Revenue Procedures 2013-14 and 2013-19 last reviewed or updated May 21, 2015 available at <https://www.irs.gov/Tax-Professionals/Section-7216-Frequently-Asked-Questions>

ⁱⁱ Intuit: Fact Sheet and Outlook, September 17, 2015 available at <http://investors.intuit.com/financial-information/fact-sheet/default.aspx>

ⁱⁱⁱ Population of 320,695,675 on April 15, 2015 according to the United States Census, "U.S. and World Population Clock," available at <http://www.census.gov/popclock/>

ⁱⁱⁱ Lizbeth Silberman, "Guidance to State Agencies on processing SNAP Applications Submitted by Intuit (TurboTax)," The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS), February 27, 2015 available at <http://www.fns.usda.gov/snap-guidance-intuit-snap-applications>

^{liv} Lizbeth Silbermann, “Guidance to State Agencies on processing SNAP Applications Submitted by Intuit (TurboTax),” The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS), February 27, 2015 available at <http://www.fns.usda.gov/snap-guidance-intuit-snap-applications>

^{lv} Nathalie Tadena, “Among Tax Prep Ads, H&R Block and TaxAct Lead the Pack for Creative Effectiveness,” Wall Street Journal, February 19, 2015 available at <http://blogs.wsj.com/cmo/2015/02/19/among-tax-prep-ads-hr-block-and-taxact-lead-the-pack-for-creative-effectiveness/>

^{lvi} Diane Whitmore Schanzenbach, “Experimental Estimates of the Barriers to Food Stamp Enrollment,” Institute for Research on Poverty, Harris School of Public Policy, University of Chicago, September 2009.

^{lvii} *Id.*

^{lviii} Saurabh Bhargava and Dayanand Manoli, “Why Are Benefits Left on the Table? Assessing the Role of Information, Complexity, and Stigma on Take-up with an IRS Field Experiment,” Carnegie Mellon University and University of Texas at Austin.

^{lix} Internal Revenue Service, Department of the Treasury, “Volunteer Income Tax Assistance: Helping You Help Others – VITA Grant Program Overview and Application Instructions,” Publication 4671 (Rev. 4-2015) Catalog Number 51402Q available at <https://www.irs.gov/pub/irs-pdf/p4671.pdf>

^{lx} Ben Kallos, “Introduction 855 of 2015: A Local Law to amend administrative code of the city of New York, in relation to requiring the human resources administration/department of social services to use income tax filings to determine eligibility for public benefits,” New York City Council, July 23, 2015 available at <http://benkallos.com/legislation/introduction-855-2015-automatic-benefits>

Automatic Benefits: Reducing Red Tape, Improving Lives

By making better use of the data they already have, governments could dramatically improve service delivery.

BY: [Beth Simone Noveck](#) | August 17, 2015

In 2005, California instituted a pilot program called ReadyReturn in which 50,000 taxpayers received an already-completed state tax return. The state compiled the returns based on data it already had from employers and banks. A survey of ReadyReturn participants found that 90 percent said they had saved time, and the ReadyReturn approach to tax filing has now been adopted by the state as standard practice.

In a [2006 paper](#), Professor Austan Goolsbee of the University of Chicago (later chairman of President Obama's Council of Economic Advisors), made the case for the "Simple Return." Same idea. Goolsbee argued that if the IRS pre-filled the 1040 for the some 40 percent of Americans who take the standard deduction and do not itemize, it would save 225 million hours of time and more than \$2 billion a year in tax-preparation fees while increasing revenue to the IRS from reduced errors. Alas, Goolsbee's proposal is still aspirational.

There's a lot of appeal to reducing taxpayers' pain and accelerating their ability to pay into the fisc. But what about applying the same concept to when government *pays out* benefits? That's exactly what New York city council member Ben Kallos, a software developer and chair of the council's Committee on Governmental Operations, wants to do: automate all benefits.

Under a bill Kallos recently introduced, city residents would receive all benefits for which they are eligible simply by filing a tax return or applying for one benefit. Re-certifications would be automatic rather than arduous. The hope is that, instead of confusion, stress and repetitious paperwork, automatic benefits will ensure that the right people get what they need to help them get out of poverty *and* reduce administrative costs.

Of course, a great deal of research and planning will be needed to "score" the bill and empirically assess how much it would cost, how much it would save, how such a program would be administered and who would benefit. But thanks to today's readily available open data about the services the city delivers, this task would will be much easier and less speculative than it would have been in the past.

States, too, could easily make the switch to automated benefits. In Louisiana in 2010, the Department of Social Services implemented "[express lane eligibility](#)," which automatically enrolls and renews children for Medicaid- and Children's Health Insurance Program-based food-assistance eligibility. In doing so, the state has saved \$1 million a year in administrative costs while the percentage of uninsured but eligible children has dropped from 5.3 percent to 2.9 percent.

In California, a cash-assistance program called [CalWORKS](#) comes automatically with Medi-Cal, the state's Medicaid program. And across the country, when residents turn 65 they are automatically enrolled in Medicare.

Instead of filling out the same forms over and over again, residents should be signed up for services based on information they have already provided. A smart, efficient, data-driven government can invert the process so that rather than having to fill out forms, people need only to correct them. As a result, delivering services could be dramatically improved. It may seem counterintuitive, but automatic or ready benefits have the potential to result in more services delivered by smaller yet more efficient government.

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June 27th, 2017



FAMILY HEALTH CENTERS AT NYU LANGONE

Committee on General Welfare

Chair of Committee on General Welfare: Stephen Levin

Good morning Chairperson Levin, members of the General Welfare Committee, members of the City Council and colleagues. Thank you for the opportunity to speak today.

I am Andree Monnier, an Assistant Director at the Family Health Centers' at NYU Langone [formerly NYU Lutheran Family Health Centers]. For those who may be unfamiliar, for 50 years, the Family Health Centers has been a staple in Sunset Park and Southwest Brooklyn. Through the years we have grown from one health center to 9 main locations providing culturally competent medical, dental, and behavioral health care in Brooklyn, over 30 school-based medical and dental clinics, a community medicine program serving over 7,000 homeless New Yorkers, and a myriad of social support services catering to the needs of over 100,000 health center patients. Working at the Family Health Centers for over 5 years and living within its service area, I have seen the tremendous impact that the health center has had on the most vulnerable populations- children, the homeless, the poor and the unemployed.

Last year, approximately 80% of our patient population was 200% below the federal poverty level- 70% were 100% and below. Though providing the best medical care to these patients is our mission- we know it is not enough.

Barriers like unstable housing, food security, unemployment or low paying jobs, and low educational attainment, all play a significant impact on our patients' access to care and engagement in their own health.

Going to the doctor is simply, not a priority, when a patient or their family is in an unstable environment- and not paying attention to one's health, many times leads to hospitalizations, severe illnesses and chronic disease- all of which we know most commonly effect the poor and those with low socioeconomic status.

Many local, state and federal government assistance programs offer the opportunity to tackle these many of these barriers and have been created to help people "get on their feet" -to forge a stable and safe environment for my fellow New Yorkers. But, unfortunately, people often know very little about these programs as navigating through the system to even know what programs exist is difficult- many rely on word of mouth. And to find out whether or not they are even eligible is another mystery.

The Family Health Centers supports the bill proposed today because it ensures people will be notified of their eligibility of all benefits as people are frequently unaware of what they qualify for. The bill proposed today provides a simple but powerful element- *transparency*.

Transparency gives our patients who enroll in Medicaid the ability to take advantage of several other programs that can help in other aspects of their lives. It gives community members who may have applied for public housing the knowledge that they meet the requirements for Medicaid and now that they have some place to live, they can now seek the medical attention that they require. Transparency is necessary when one lives in an uncertain and obscure environment.

This bill directly impacts many of the individuals and families we serve and has the potential to link them with needed access to preventive medicine, prenatal care, infectious disease treatment or mental health care.

Therefore, on behalf of the Family Health Centers at NYU Langone, I support this bill.

Thank you.

FOR THE RECORD

Testimony
of
Elizabeth Holtzman
before
The City Council Committee on General Welfare
on
Intro. 855-A
June 27, 2017

I want to begin by congratulating and thanking Councilmember Ben Kallos for sponsoring Intro. 855-A--I want to thank the other co-sponsors of the legislation as well.

People who rely on government benefits such as food stamps or other forms of assistance are among the neediest and most vulnerable in our society. Yet, too many unnecessary bureaucratic obstacles are put in the way of their obtaining or requalifying for benefits. A New York Times article in July, 2015 described some of these problems. Eliminating these obstacles needs to be more of a priority for New York City.

When I was New York City Comptroller, I found out about the problem first hand. I remember visiting a welfare center. I saw how much time people spent filling out forms, and how much time was wasted waiting for interpreters when the forms weren't in their language. As Comptroller I also knew there was an error rate because city employees were looking up information, such as car values, and erroneously transcribing them. I thought there were many ways of making the system much more user friendly, which would have also had the positive effect of helping applicants for assistance, as well as reducing the number of caseworkers dealing with benefits assistance who could be retrained to provide counseling and other help for those receiving or entitled to benefits. The reaction of the City Administration to my request for addressing these obstacles was: "We don't want to make it too easy to apply for benefits."

That was the wrong approach then and it remains the wrong approach today. The City should be doing whatever it can to ensure that people who are entitled to benefits are getting them. Computers and smart phones offer easier ways to help applicants, avoid fraud and make the process more efficient and less error prone.

That is why Councilmember Kallos' bill is so important. It starts by requiring that recipients of one form of public assistance be informed if they are eligible for another form. Not only that, but the City will have to pre-fill applications for these other programs to the extent there is information available to do that. Regular reporting to the City Council will help ensure that this kind of pro-active thinking takes hold and makes a difference to those eligible for assistance.

I am glad that I had an opportunity to share my concerns about these bureaucratic obstacles with Councilmember Kallos when he was first elected to the City Council and I am

proud that he has followed up on the problem. I know this is not a glamorous subject, but it can make a huge difference to those in the City who most need government help.

Thanks again to Councilmember Ben Kallos and the other co-sponsors of the bill for their important work.

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FOR THE RECORD

June 26, 2017

Memorandum in Support

Re: Int. No. 1597: A local law to amend the administrative code of the city of New York, in relation to requiring that the Department of Homeless Services recognize time spent in foster care as homelessness for the purpose of meeting rental voucher eligibility requirements

Lawyers For Children (“LFC”) is a not-for-profit legal corporation dedicated to protecting the rights of individual children in foster care and compelling system-wide child welfare reform in New York City. Since 1984, LFC has provided free legal and social work services to children in cases involving foster care, abuse, neglect, termination of parental rights, adoption, guardianship, custody and visitation. This year, our office will provide services to children and youth in nearly 3,000 Family Court cases. We are particularly attuned to the needs of youth leaving foster care to independence; LFC’s Adolescents Confronting Transition project is comprised of attorneys, social workers and youth advocates who focus exclusively on the needs and challenges of youth transitioning out of foster care to adulthood. Our comments are based on over 30 years experience representing thousands of children and youth in – and aging out of – foster care.

We urge the City Council to pass this bill, as it will provide crucial housing support to youth who are aging out of foster care. As reported by ACS pursuant to Local Law 46, in 2015 (the last year for which data is available), 652 young people were discharged from foster care to live on their own. Of those, only 229 obtained NYCHA housing. The sad reality is that the remainder were woefully unprepared to obtain a market-rate apartment; only 160 of the 652 youth had completed high school. While many of the youth had a verifiable source of income, for most, that income was from public assistance, part time work, and/or minimum wage jobs. Making LINC vouchers available to youth who are aging out of foster care and to those who were formerly in foster care will play a huge role in ensuring that these youth have a safe, stable place to live.

Expanding the availability of LINC vouchers to this population makes sound fiscal sense. Currently, ACS maintains young people in foster care past age 21 if no stable housing is available to them. Many of these youth could take advantage of the LINC voucher to leave foster care – at a cost to the City that is significantly less than the cost of maintaining the young person in a foster care placement.

Finally, it should be noted that this bill will eliminate the absurdity of requiring young people who are living in foster care because they have no homes to call their own, to enter the shelter system so that they can access LINC vouchers.

For these reasons, we urge the City Council to pass this bill.

Karen J. Freedman
Executive Director

Betsy Kramer
Public Policy Project Director

Benefit Kitchen Testimony re: INT-855A

Council Member Kallos has asked the founders of Benefit Kitchen, Melanie Lavelle and Dan Beeby, to provide testimony regarding the "Automatic Benefits" legislation (Proposed Int. No. 855-A - 6/19/17). Though we cannot attend today, we provide this written testimony in favor of the proposed legislation.

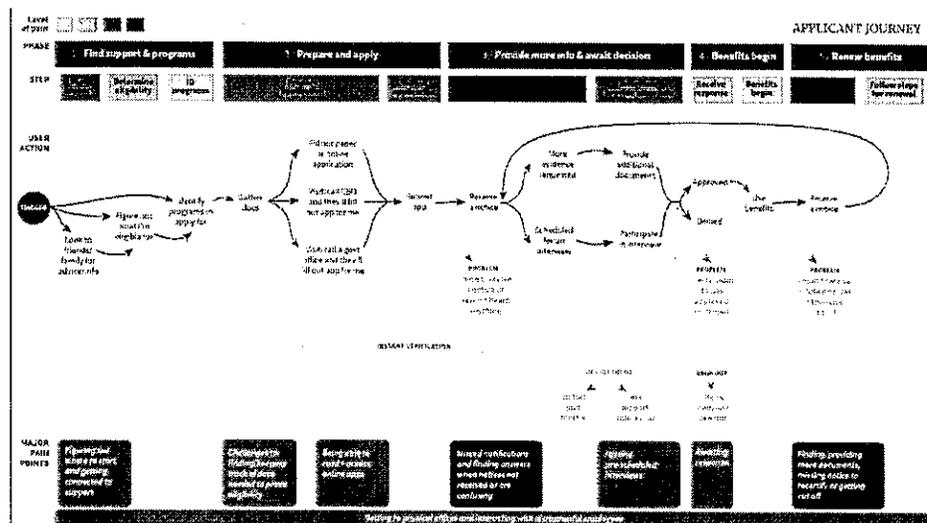
Melanie Lavelle has worked in the public benefits policy realm since 1997 at various non- and for-profit organizations. Dan Beeby has been a developer of modeling systems used by benefit-access advocates since 2004.

We are in favor of this legislation that will help New Yorkers understand and apply for the benefits for which they are eligible.

Unfortunately, only about half of New Yorkers who are eligible for benefits, like SNAP, actually receive them. Nationally, this means that \$80B in allocated programs remain unclaimed by needy families. This not only hurts low-income families, it hurts our city's economy; those dollars aren't reverberating through the local super markets, banks, hospitals, and schools like they should. This legislation, by providing notification of eligibility and pre-filled forms to families, would take the first step towards closing the gap between New Yorkers and the benefits they've earned.

As we have seen after major disasters in NYC (like 9/11 and Hurricane Sandy): when there is goodwill to the citizens government agencies can be very efficient in helping people get the benefits for which they are eligible. However those moments are seldom and

brief--administrations make people who are already working and caring for their families jump through hoops for the benefits they have earned. As this slide (#35 in a presentation from a [USDS and the Center for Medicaid Services](#) illustrates), there are many "pain points" throughout the application process, which can take weeks or months to complete.



Good information leads to good decision making. Telling a family precisely how much they are eligible for (so that they know if it is worth their time to apply) and, in the case of a denial, to be given an explanation would greatly increase transparency within government programs. In whatever way we make transparency and goodwill part of the process, Benefit Kitchen applauds that work.

Finally, applications require families to divulge a lot of personal and family information. This information can be used in detrimental ways across governmental organizations (e.g. questions about child support or immigration status in the Food Stamps office can result in law-enforcement knocking on your door the next day). The most vulnerable New Yorkers can be opened up to abuse if one branch of government knows too much about you and that information is shared or leaked to other departments (as we have seen with ID NYC). Anonymity should be a feature of this work that the city council seeks to do and not a footnote.

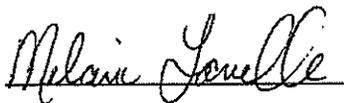
An anecdote: we have done public benefit trainings nationwide. During these sessions we ask caseworkers if the government has called up any of the families they serve and said, "Hey, you're eligible for Food Stamps, please come in and apply!". This usually gets us a good laugh. But this bill would do just that—it would flip the script. Thank you New York City and City Council Member Ben Kallos for considering this step and bringing innovation to our city and dignity to its citizens.

To recap our position:

- We support this legislation
- We believe that the city should act to facilitate, not hinder, benefit applications for New Yorkers.
- We think that benefit dollar estimates should be included in any communication with families so that they can make informed decisions.
- We realize that benefit application information should be protected so that it cannot be misused to hurt families.

We commend the New York City Council for its forward thinking on this issue. Thank you for the opportunity to provide our input on this important legislation.

Sincerely,



Melanie Lavelle



Daniel Beeby



COLUMBIA UNIVERSITY

IN THE CITY OF NEW YORK

SCHOOL OF SOCIAL WORK

To the Committee on General Welfare of the New York City Council

Re: Proposed Int. No. 855-A - 6/19/17 - Notification of public assistance eligibility.

I commend the Council on moving in this direction. For two generations public assistance has been administrated with a focus on preventing fraud and not on assuring the well-being of the residents. The democratic process in the US, in New York State and in New York City has established appropriately defined benefits based on clear eligibility standards. Instead of administering these benefit in such a way as to assure that they are fully distributed to persons who have be defined eligible, public welfare has built barriers to access in the name of fraud prevention and probably to a less extend to reduce the cost of the programs. Requiring HRA and other city agencies to become proactive in assuring that residents are enrolled in programs for which they have been deemed eligible by the democratic process is a major set ahead.

In the last ten years, I have served as a social work in advocating and case management for frail elderly persons and persons return from prison. I have worked with persons who are accessing Medicaid, long term care services, SNAP/food stamps, WIC, HEAP and city state and federal housing programs. I have been active in child protective services and adult protective services. I have worked to access SSI and OASDI benefits as well as Medicare. Many of the NYC residents that I have served are dually eligible, receiving both Medicare and Medicaid. I have done a little work accessing child care services. I have spent hours on the phone and made many visits to eligibility offices.

As I understand this legislation, city agencies would become responsible to rationalizing the eligibility process so that any city eligibility work would provide entry to all city programs. In addition to doing eligibility work across programs the same approach should be developed for recertification. Working with persons with limited sight, limited formal education and some cognitive limitation, the present city recertification processes are torturous. At different time of the year, the person receives notices to recertify from SNAP, Medicaid, HEAP, long term care services, housing vouchers and others. It becomes an ongoing endurance race of leads to endless lost letters and missed due dates and incomplete documentation leading to appeals and resubmissions and to people being removed from benefits. New York City government should be able to develop on annual recertification each year that will significantly reduce errors and the related pain and cost of the present process.

An HRA eligibility workers need to be prepared and supported to in a single interview establish which city managed and/or funded programs the person qualifies: TANF, WIC, SNAP, Medicaid, HEAP, School lunch and breakfast, public housing, Section 8, other housing vouchers, child care, home care, counseling and other. In the 1960, this was the work of a public welfare case worker. Presently we are a long way from this standard. Most HRA and other city eligibility workers have a limited understanding of eligibility for the particular program that they are responsible for and usually have to speak to supervision if the case is not completely routine. City computer screens are not designed to provide the HRA worked with the necessary questions to sort out what benefits that applicant might require. The city has limited integration of its public information webpages and print document to connect the various programs. I want to stop and underline that therefore this bill is not a minor change of practice for HRA, NYCHA, NHS, ACS, HHC, DOC and other city agencies. It will require a major transformation from a fraud and denial based system to a consumer focused system that see providing the best option for city residents as the norm of practice. Shifting these systems will cost money.

Presently, we waste hundreds of millions of dollars throughout NYC in multiple eligibility workers, in unnecessary resubmission and appeals, in failed funding for necessary services and in the work of community advocates who spend hours of their days following up on the byzantine nature of the fraud based approach we have come to use in administering public benefits.

This bill is a first step. It would require city agencies to shift their eligibility work in the direction of delivering services instead of limiting them. It is wonderful to see the Council move New York in this direction.

John G Robertson LMSW PhD
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June 27, 2017



Breaking the Cycle of Homelessness
for Women and their Children

Testimony of

Raysa S. Rodriguez

Vice President, Policy & Planning

Presented to the

New York City Council General Welfare Committee

Regarding

Navigating the Shelter System as a Family with Children

June 27, 2017

Good afternoon. Thank you to Chair Levin, and all the members of the General Welfare Committee. It is a pleasure to be with you this morning. My name is Raysa Rodriguez and I'm the Vice President of Policy and Planning at Win.

Win is the largest provider of shelter and supportive housing for homeless families in New York City. For more than 33 years, Win has provided safe housing, critical services, and ground-breaking programs to help homeless women and their children rebuild their lives and break the cycle of homelessness.

In the past year, Win served nearly 10,000 homeless people—including more than 6,000 children—and helped nearly 800 families transition out of shelter into homes of their own.

When we talk about homelessness, the image that pops into most people's head is what we see on the street. But although the chronically street homeless are certainly the most visible segment of the homeless population, they make up only a tiny fraction of the nearly 60,000 New Yorkers who have no place to call home.

In fact, over 70% of homeless New Yorkers are families with children. Most of our families are headed by women. These are the forgotten faces of homelessness—the mothers, grandmothers, aunts, and sisters who struggle to keep their families together and safe.

The average homeless family in a Win shelter is a single mom in her thirties with two small kids. You don't see her panhandling on the subway or on the sidewalk, because she's probably working. More than half of the moms in Win shelters are currently employed, and 91% have a work history. But no matter how hard she tries, she never seems to earn enough to make ends meet. She might work as a home health aide or a security guard, or in an extremely low-wage industry like retail, food service, cleaning, or administration where real wages have decreased by an estimated 4.5% since 2007.¹ She might be trying desperately to advance her career, but without a Bachelor's or Associate's degree, she finds that it's nearly impossible. Nearly 86% of Win mothers are raising a family with a high school diploma or less.

Even as wages for low-income workers stagnate and decline in New York City, the rents have continued to rise: median gross rent rose 18.3% from 2005 to 2015.² The current median rent in New York City is \$3,185 a month. The National Low Income Housing Coalition estimates that there were only 35 affordable apartments for every 100 extremely low-income renters in the New York Metropolitan Area in 2016. Amidst such ruthless competition for affordable housing, 80% of extremely low income families in New York end up carrying a severe housing burden, renting apartments that cost more than half of

¹ New York City Independent Budget Office. (2016). *Analysis of the Mayor's Preliminary Budget for 2017. IBO's Re-estimate of the Mayor's Preliminary Budget for 2014 and Financial Plan through 2020*. New York, NY: Belkin, D. et. Al. Retrieved: <http://www.ibo.nyc.ny.us/iboreports/analysis-of-the-mayors-2017-preliminary-budget-and-financial-plan-through-2020.pdf>.

² NYU Furman Center (June 2017) *2016 Focus: Poverty in New York City*

their income.³ The average homeless mom at Win may have been renting an apartment she could barely afford, or been living in overcrowded room with friends or family. Like so many New Yorkers, she was only one bad week away from eviction and homelessness.

Advocates agree that the economic roots of homelessness are pernicious, but it is worth pausing to note that women who enter the shelter system are at particular risk for the trauma of domestic violence. Advocates estimate that one-third of families in a New York City shelter are homeless as a result of domestic violence. Nationally, 80% of homeless mothers have experience domestic violence as adults,⁴ and homeless mothers are much more likely than housed, low-income women to have experienced trauma as children, including violence, abuse, and involvement in systems such as foster care.⁵ DHS data indicate that in early 2016, for the first time, domestic violence surpassed evictions as the primary reason that people enter the shelter system.⁶ Domestic violence is not only physical violence, it can also manifest as economic violence, which might entail preventing a victim from attending work, pursuing educational opportunities, or denying her access to shared financial resources.

Whatever the precipitating event that leads to each individual family's crisis, in New York City they make the journey to the Prevention Assistance and Temporary Housing (PATH) Office in the Bronx for a way forward. On this journey with her children, this homeless mom might be remembering her own first experience going into a shelter, as a child with her own mother. One in five mothers in Win shelters first entered the shelter system as children themselves. Like any mother, she wants a better life for her children. Tonight, more than 23,600 children will go to sleep in a homeless shelter. In Win shelters alone, there were nearly 1,500 children under the age of five—a critical period for brain development—who were homeless in 2015.

We know the impact of homelessness and other trauma can also be toxic for school-aged children and can severely impair academic achievement.

After intake at PATH, mom is assigned to one of the family shelters scattered throughout the five boroughs. If sent to one of Win's facilities, after another protracted subway ride she'll meet staff trained in trauma-informed, strengths-based care. She will complete a comprehensive assessment of needs and strengths, which will be used to develop a service plan to help her move forward and to permanent housing. But for now she is focused on settling into this temporary room. After a long night, she finally

³ National Low Income Housing Coalition. (2016). *The Gap: The Affordable Housing Gap Analysis 2016*. Washington, D.C.: Aurand, Andrew, et. al. Retrieved: http://nlihc.org/sites/default/files/Gap-Report_print.pdf.

⁴ US Interagency Council on Homelessness. (2015). *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. Washington, D.C.: no author. Retrieved: https://www.usich.gov/resources/uploads/asset_library/USICH_OpeningDoors_Amendment2015_FINAL.pdf.

⁵ Bassuk, E.L., Buskner, J.C., Weinreb, L.F. et. al. (1997). Homelessness in Female-Headed Families: Childhood and Adult Risk and Protective Factors. *American Journal of Public Health*. 87 (2), 241–249.

⁶ Goldensohn, R. and Schifman, G. (26 October 2016) Domestic violence emerges as economic scourge and primary driver of homelessness. *Crain's*. Retrieved: <http://www.craigslist.com/article/20161026/BLOGS04/161029881/domestic-violence-emerges-as-primary-driver-of-homelessness-in-new-york-city>

tucks her children into bed. She has to figure out how to get her kids to school in the morning, how to get herself to work, and how to rebuild her life.

In addition to connecting families to any benefits they may be entitled to, at Win we work hard to grow our clients' incomes through work. These individualized programs begin with vocational guidance and coaching, offering such practical services as job search and resume writing help. Beyond that, we are also pursuing income-building strategies that create pathways to employment in high-opportunity, non-traditional jobs for women like construction, culinary arts, and technology. Among work-eligible participants in fiscal year 2016, more than half made at least one income gain.

And yet, these income gains are simply not enough to allow the average homeless family to compete in New York City's cutthroat housing market. The typical Win family earns \$1,300 per month, and the median monthly rent in New York City is \$3,185. Our average family would need to increase their income eightfold in order to afford the average New York City apartment.

Fortunately, we know that there is a proven strategy for providing homeless families with a permanent path out of shelter: housing subsidies. In 2016, Win was able to help move 800 families from shelter into permanent housing. Nearly 450 of those families- about 55% of the families who left shelter for their own home- had the help of a rental subsidy. Among the 140 or so families that have unfortunately cycled back into the shelter system since leaving Win's shelters, the vast majority—93%—were families that did *not* have a housing voucher or subsidy in place when they left Win. This suggests that without continued support, families quickly become vulnerable to the destabilizing effect of New York City's high housing costs and overcrowding.

We also know that at one point, 80% of granted LINC vouchers weren't being used. That was over 10,000 families living in shelter despite having a LINC voucher in hand.⁷ We hear from many families that landlords don't want to accept LINC vouchers. This may be because of the amount of the voucher: LINC provides only \$1,515 per month for a family of three, compared to the \$1,768 of monthly Section 8 assistance for a two-bedroom apartment. At Win, we believe that the formula for calculating the LINC voucher amount must be adjusted to reflect the reality of the housing market and family means in New York City.

Landlords may also be reluctant to accept a voucher that they know will eventually expire, leaving them with a tenant who is unable to afford the rent. Landlords need assurance that the LINC voucher program is a permanent fixture in the landscape of homelessness prevention and alleviation. It is urgent that vulnerable New Yorkers be allowed to continue to receive vital housing subsidies provided by LINC rather than being cut off after some arbitrary length of time, only to be thrown back into the trauma of the shelter system.

⁷ Goldensohn, R. (9 November 2015) 80 Percent of LINC Homeless Rent Vouchers Aren't Being Used, City Says. *dna info*. Retrieved: <https://www.dnainfo.com/new-york/20151109/fort-greene/80-percent-of-homeless-rent-vouchers-arent-being-used-city-says>

Int. No. 1642 would aim to tackle both of these problems, by linking the maximum rent to which LINC vouchers can be applied to the fair market rent set by the United States Department of Housing Preservation and Development, and allowing that amount to increase annually as the cost of living increases. Finally, it would remove arbitrary time limits on eligible families continuing to receive rental assistance vouchers.

We must also do more to protect some of the most vulnerable New Yorkers from homelessness. We know that 18-26% of youth aging out of foster care in NYC end up in homeless shelters,⁸ compared to just 4% of youth not involved in the foster care system nationally.⁹ Int. No. 1597 would amend the administrative code so that for youth under the age of 25, DHS recognizes time spent in foster care as “homelessness” for the purpose of meeting rental voucher eligibility requirements, rather than mandating a minimum of 90 days in shelter to qualify. When one in four youth will survive the foster care system only to end up without a home, it seems cruel to force these young people to spend three months in the shelter system before they become eligible for the assistance they so vitally need to achieve housing stability.

Until New York’s affordability crisis can be solved, we must do more than help struggling families get on their feet, we have to help them stay on their feet. A long-term problem like NYC’s affordability crisis requires a lasting solution. The two bills I’ve mentioned here today are a great start. When we remember the real face of homelessness—the young mother lost in thought sitting next to you on the subway, the co-worker who you share your coffee break with, or your child’s playmate on the monkey bars—we can design solutions that help our most vulnerable neighbors, and break the cycle of homelessness for good. Thank you again for your time and attention to this urgent problem.

⁸ NYC Public Advocate (September 2014) Policy Report: Foster Care Part I. Improving the outcomes for youth aging out of foster care in NYC.

⁹ Dworsky, A., Napolitano, L., and Courtney, M. (2013 Dec). Homelessness During the Transition from Foster Care to Adulthood. *American Journal of Public Health*. 103(Suppl 2), S318–S323.

Testimony of
Coalition for the Homeless
and
The Legal Aid Society

on

Oversight – From PATH to Permanency:
Navigating the Shelter System as a Family with Children

prepared for submission to

The New York City Council
Committee on General Welfare

by

Giselle Routhier
Policy Director
Coalition for the Homeless

Kathryn Kliff
Staff Attorney
The Legal Aid Society

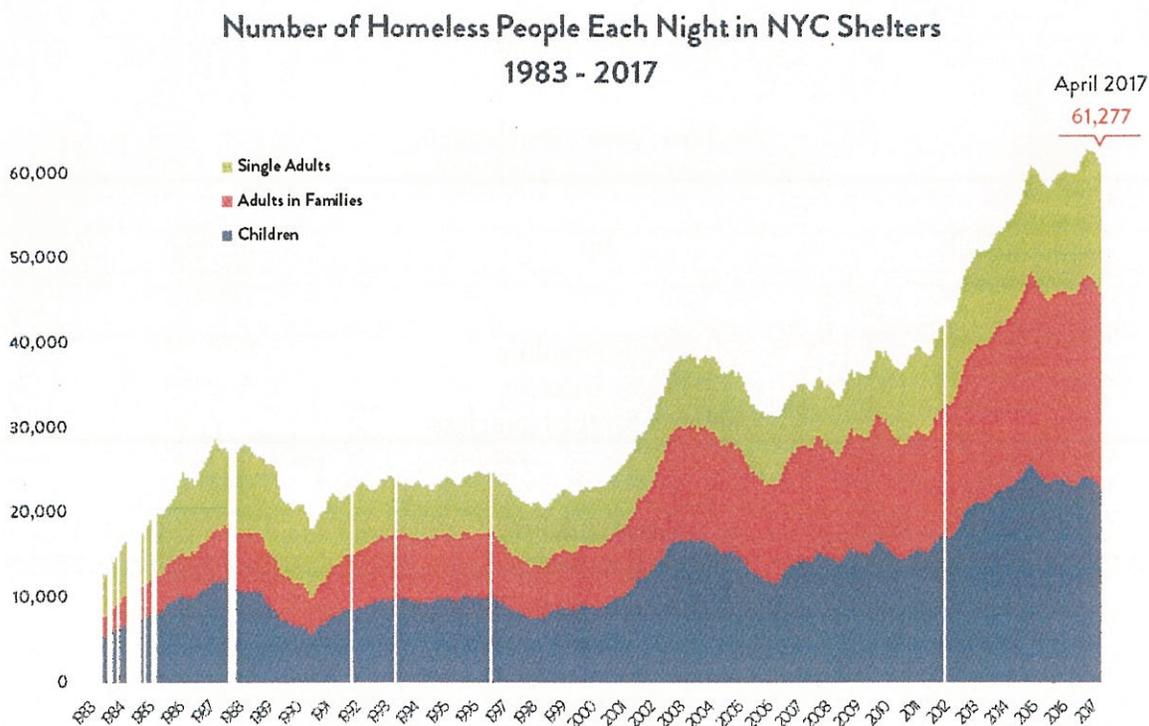
June 27, 2017

Coalition for the Homeless and The Legal Aid Society welcome this opportunity to present testimony to the Committee on General Welfare regarding homelessness among families with children and their experiences in the shelter system.

Near Record Homelessness among Children in NYC

There is widespread evidence of the negative impact of homelessness on children. Homeless children are far more likely than their housed peers to experience health, developmental, and behavioral problems. They are also much more likely to fall behind in school, miss school, and perform worse on measures of academic achievement.¹

The number of homeless children in families is now 60 percent higher than a decade ago, as New York City remains in the midst of the worst homelessness crisis since modern mass homelessness first emerged in our city roughly four decades ago. In April 2017, a near-record 61,277 men, women, and children slept in shelters each night, including 23,000 children.



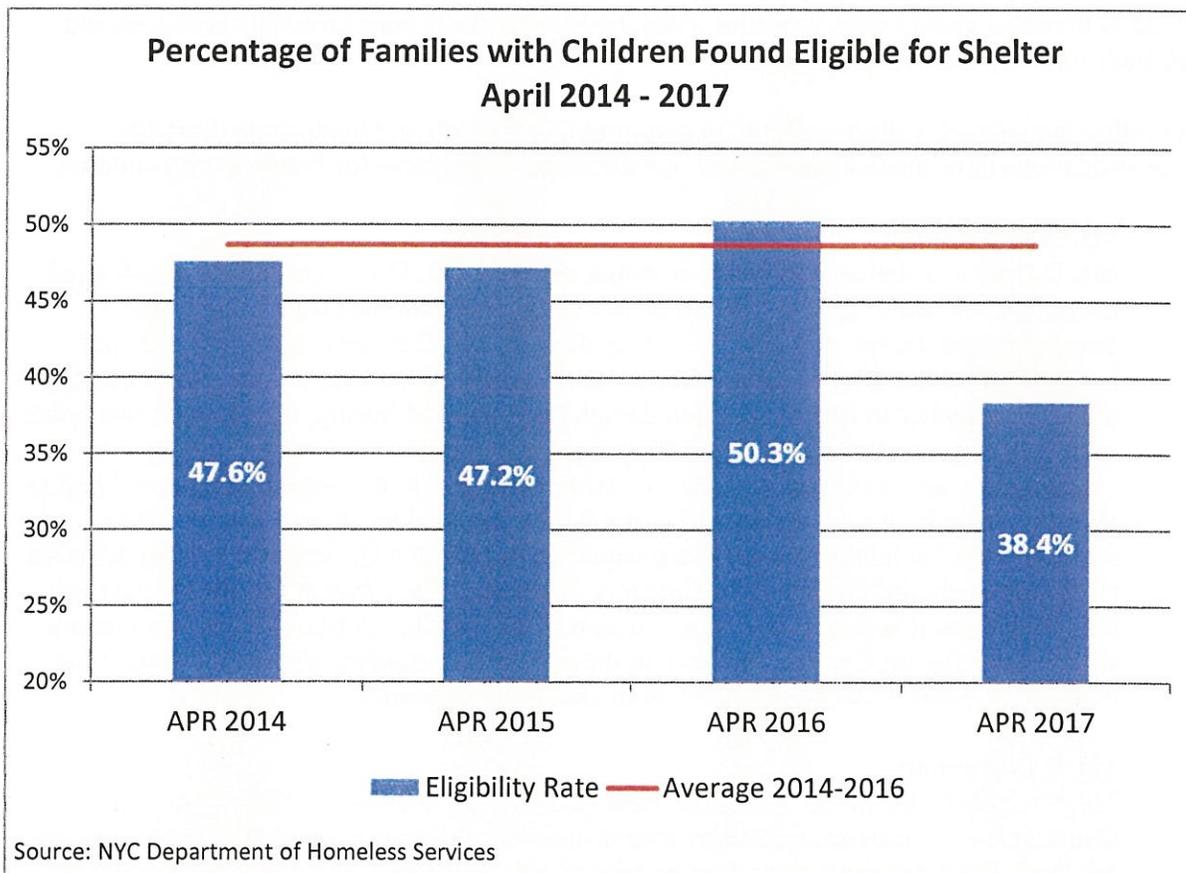
Source: NYC Department of Homeless Services and Human Resource Administration; LL57 Reports
 Data include individuals in veteran's shelters, Safe Havens, stabilization beds, and HPD emergency shelter.

PATH and the Error-Prone Intake Process for Homeless Families

At the City's request, the State modified an administrative directive in November 2016 which governs eligibility for shelter for families with children. That change allowed the City to make it

¹ Routhier, G. (2012). Voiceless Victims: The Impact of Record Homelessness on Children. Coalition for the Homeless

even more difficult for homeless families to gain access to shelter. Indeed, in each month since the directive was modified, the City has turned away a greater percentage of families in crisis. In April 2017, only 38 percent of families applying for shelter were found eligible, compared with an eligibility rate of over 50 percent the previous April – and an average eligibility rate of 49 percent during the first two years of the de Blasio administration.



As a result, far too many homeless families are left with no option but to return to untenable and often unsafe housing situations or sleep on the streets. Often, the best hope is for a homeless family to repeat the onerous application process for a second or third time as they await the correct outcome: Eventually being found eligible.

In April 2017, 42 percent of families ultimately deemed eligible for shelter had to submit two or more applications, up from 34 percent in April 2014. Being forced to apply multiple times is extremely stressful for families who are already experiencing crises. The process disrupts parents' jobs, children's schooling, and generally exacerbates the trauma of homelessness – particularly for children. Further, the difficulty homeless families face in applying for shelter is often compounded by the lack of case management, social supports, and proper training of PATH workers, as illustrated in case examples below.

Placements and Disability Accommodations

As the shelter system has expanded to record levels and capacity has tightened, the City's ability to provide appropriate placements has suffered. Families are now much less likely to be placed near their children's schools, and accommodations for those with disabilities are often not supplied in a timely fashion – if at all. Regrettably, half of all homeless families continue to be placed in hotels or cluster sites, facilities which have notoriously poor physical conditions and lack both services and case management.

The following examples illustrate how inappropriate placements and inadequate disability accommodations have made the trauma of homelessness even worse for families with children:

Ms. D and Family

Ms. D lives in a shelter with her four young children. Ms. D was previously a registered nurse, but she had to give up her job to care for her son who has Down Syndrome, developmental delays, and reactive airway disease. Ms. D became homeless after her home was foreclosed upon. Her children attend school in Queens, but they were initially placed in a shelter in Brooklyn. Even though they received busing, it took them two hours each way to get to and from school. They were also placed in a shelter without air conditioning, and it exacerbated Ms. D's son's condition to the point that it caused him to vomit repeatedly. It took weeks before the family received an air conditioner. After a year in the shelter, the family was told they would be moved to a Queens unit so they could be closer to the children's schools and doctors. However, when they got to the Queens unit, they found that it lacked an elevator and so was inaccessible to Ms. D's son, who uses a wheelchair. The family was sent back to the shelter in Brooklyn, where they waited for over a month before another placement in Queens was located.

Ms. S and Family

The S family includes Ms. S, her husband, and their three children. Their youngest daughter is one year old and suffers from a number of developmental disabilities. Due to her disabilities, she must use a feeding tube to eat. As a result, she must live in a shelter unit with an individual kitchen and bathroom so that the medical and feeding equipment can be properly cleaned. Because DHS placed the family in a unit without an individual kitchen, the hospital could not release the daughter to the family's care. It took weeks and extensive advocacy by the hospital and The Legal Aid Society to secure a unit for the family that is suitable and safe for their daughter.

In addition, the S family is seeking asylum from Nigeria because their daughters were at risk of female genital mutilation at the hands of their extended family. Staff at PATH called family members in the home country, potentially endangering the family who had fled and did not want their extended family to know their whereabouts. PATH workers also called Ms. S and her husband, demanding that they justify their need for shelter by explaining why they were fearful of returning to Nigeria, forcing the family to discuss extremely sensitive and painful issues with staff not properly trained in those issues.

Given the prevalence of challenges such as these, we are pleased that the recent settlement in the Federal class action lawsuit *Butler v. City of New York* should soon be finalized. It will provide a thorough framework for making the shelter system accessible for people with physical and mental disabilities, and the provision of reasonable accommodations for all who need them.

Recommendations

The City, jointly with the State where applicable, must improve shelter processes and conditions in order to reduce the trauma of homelessness for children and families. Specifically, The City and State should implement a less onerous shelter intake process in which 1) applicants are assisted in obtaining necessary documents, 2) the housing history documentation requirement is limited to a list of residences for six months, and 3) recommended housing alternatives are verified as actually available and pose no risks to the health and safety of applicants or to the continued tenancy of a potential host household.

We support Mayor de Blasio's plan to discontinue the use of dangerous and inappropriate shelter models, such as cluster sites and hotels, but urge that the schedule for ending their use be accelerated. Further, the Mayor must make use of all available housing resources for homeless families, in order to achieve meaningful reductions in the shelter census and reduce the need to develop new shelter capacity. This could be done by increasing the number of placements into NYCHA apartments from 1,500 to 3,000 per year and by adding at least 10,000 more affordable housing units set-aside for and built for homeless households not in need of supportive housing.

Last, the pending "Fair Share" bill package introduced in the City Council is designed to restrict the siting of certain facilities and should be amended to exclude shelters, supportive housing, and other facilities serving those with disabilities in order to ensure that they do not exacerbate the current capacity crisis and force more families with children to the streets. As currently written, they could be used to foster unlawful discrimination and violations of the Federal Fair Housing Act and jeopardize the City's access to Federal housing resources.

We thank the Council for the opportunity to testify and look forward to working together on our mutual goal of ending homelessness in New York City.

About Coalition for the Homeless and The Legal Aid Society

Coalition for the Homeless: Coalition for the Homeless, founded in 1981, is a not-for-profit advocacy and direct services organization that assists more than 3,500 homeless New Yorkers each day. The Coalition advocates for proven, cost-effective solutions to the crisis of modern homelessness, which is now in its fourth decade. The Coalition also protects the rights of homeless people through litigation involving the right to emergency shelter, the right to vote, and life-saving housing and services for homeless people living with mental illness and HIV/AIDS.

The Coalition operates 11 direct-services programs that offer vital services to homeless, at-risk, and low-income New Yorkers. These programs also demonstrate effective, long-term solutions and include: Supportive housing for families and individuals living with AIDS; job-training for homeless and formerly-homeless women; and permanent housing for formerly-homeless families and individuals. Our summer sleep-away camp and after-school program help hundreds of homeless children each year. The Coalition's mobile soup kitchen distributes over 900 nutritious hot meals each night to homeless and hungry New Yorkers on the streets of Manhattan and the Bronx. Finally, our Crisis Intervention Department assists more than 1,000 homeless and at-risk households each month with eviction prevention, individual advocacy, referrals for shelter and emergency food programs, and assistance with public benefits as well as basic necessities such as diapers, formula, work uniforms, and money for medications and groceries.

The Coalition was founded in concert with landmark right to shelter litigation filed on behalf of homeless men and women (*Callahan v. Carey* and *Eldredge v. Koch*) and remains a plaintiff in these now consolidated cases. In 1981 the City and State entered into a consent decree in *Callahan* through which they agreed: "The City defendants shall provide shelter and board to each homeless man who applies for it provided that (a) the man meets the need standard to qualify for the home relief program established in New York State; or (b) the man by reason of physical, mental or social dysfunction is in need of temporary shelter." The *Eldredge* case extended this legal requirement to homeless single women. The *Callahan* consent decree and the *Eldredge* case also guarantee basic standards for shelters for homeless men and women. Pursuant to the decree, the Coalition serves as court-appointed monitor of municipal shelters for homeless adults, and the City has also authorized the Coalition to monitor other facilities serving homeless families.

The Legal Aid Society: The Legal Aid Society, the nation's oldest and largest not-for-profit legal services organization, is more than a law firm for clients who cannot afford to pay for counsel. It is an indispensable component of the legal, social, and economic fabric of New York City – passionately advocating for low-income individuals and families across a variety of civil, criminal and juvenile rights matters, while also fighting for legal reform.

The Legal Aid Society has performed this role in City, State and federal courts since 1876. It does so by capitalizing on the diverse expertise, experience, and capabilities of more than 1,100 lawyers, working with some 800 social workers, investigators, paralegals and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in 26

locations in New York City, the Society provides comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel.

The Society's legal program operates three major practices — Civil, Criminal and Juvenile Rights — and receives volunteer help from law firms, corporate law departments and expert consultants that is coordinated by the Society's Pro Bono program. With its annual caseload of more than 300,000 legal matters, The Legal Aid Society takes on more cases for more clients than any other legal services organization in the United States. And it brings a depth and breadth of perspective that is unmatched in the legal profession.

The Legal Aid Society's unique value is an ability to go beyond any one case to create more equitable outcomes for individuals and broader, more powerful systemic change for society as a whole. In addition to the annual caseload of 300,000 individual cases and legal matters, the Society's law reform representation for clients benefits more than 1.7 million low-income families and individuals in New York City and the landmark rulings in many of these cases have a State-wide and national impact.

The Legal Aid Society is counsel to the Coalition for the Homeless and for homeless women and men in the Callahan and Eldredge cases. The Legal Aid Society is also counsel in the McCain/Boston litigation in which a final judgment requires the provision of lawful shelter to homeless families.



Testimony of

Stephanie Gendell, Esq.
Associate Executive Director
For Policy and Government Relations
Citizens' Committee for Children

Before the

New York City Council
General Welfare Committee

*Oversight Hearing: From PATH to Permanency: Navigating the Shelter System as a
Family with Children
Int. 1597 and 1642*

June 27, 2017

Good afternoon. My name is Stephanie Gendell and I am the Associate Executive Director for Policy and Advocacy at Citizens' Committee for Children of New York (CCC). CCC is a 73-year-old independent, multi-issue child advocacy organization dedicated to ensuring every New York child is healthy, housed, educated and safe.

I would like to thank General Welfare Chair Stephen Levin and the members of the General Welfare Committee for holding today's oversight hearing on the family shelter system (from intake to permanency) for families with children. I would also like to thank Council Member Levin for introducing two pieces of legislation related to the LINC rental assistance program, both of which CCC is supporting.

CCC also appreciates the efforts that the de Blasio administration, including the Mayor himself and Commissioner Banks, have been making to try to address the homelessness crisis in New York City. Despite many investments in homelessness prevention such as the expansion of HomeBase and legal services to prevent evictions, the creation of a new rental assistance program, and a commitment to eliminate cluster sites by 2021 and hotels as shelter facilities by 2023 by building 90 new shelters and renovating 30 others.

The situation for families with children in the shelter system is dire. Last Friday, there were 22,101 children in the DHS shelter system. Together with their 16,987 parents, these families comprise nearly 70% of the City's shelter system. Many of these families needed to apply for shelter eligibility numerous times, cycling through PATH intake, before being found eligible for shelter. Once found eligible, these families remain in shelter for an average of over 430 days—well over a year. Each year, approximately 1,100 babies are born into the shelter system and nearly half of the children in the shelter system are under age six. Only half of the families in shelter are even placed in Tier II shelters that were created to provide shelter to homeless families, with the remaining families living in cluster sites and hotels. Only 55% of families with school children are placed in the borough where the youngest child had been attending school. Many families are placed far from their communities of origin, including jobs, schools, child care, health care, child welfare preventive service programs, families and other support systems.

Meanwhile, the research documents that homelessness, even in the best of circumstances, causes trauma for children, and that exposure to trauma in childhood has lifelong implications. Notably the ACEs studies have shown that the more trauma a child is exposed to, the higher their likelihood for obesity, depression, cardiovascular disease, and premature death. This means that the lives of these 22,000 children is literally in the City's hands every day.

We know that housing instability causes stress and trauma for families and children. The data and research on the experiences of homeless children paint a disturbing picture regarding the well-being of the record numbers of homeless children, even in the best of circumstances. Homelessness creates risks to the physical and emotional well-being and educational success of children. For example, children experiencing homelessness have an increased risk of illness compared to children who are not homeless: they suffer from four times as many respiratory

infections, five times as many gastrointestinal infections, and twice as many ear infections.¹ Additionally, they are four times as likely to suffer from asthma and have high rates of asthma-related hospitalizations.² Homeless children also suffer disproportionately from food insecurity, as they are twice as likely to go hungry as non-homeless children, and, due to these nutritional deficiencies they are at an increased risk of obesity.³

Being homeless has also been demonstrated to be harmful to children's emotional well-being. Homelessness causes traumatic disruptions in the lives of children, who, in addition to losing their homes, experience loss of their friends and community, sense of security, routines, possessions, and privacy.⁴ Homelessness also makes families more vulnerable to other forms of trauma, such as witnessing violence, physical or sexual assault, and abrupt separation from family members.⁵ As a result, homelessness increases a child's risk of experiencing mental illness. For example, half of school-age homeless children experience anxiety, depression, or withdrawal, compared to 18 percent of children who are not homeless, and one in three homeless children ages eight and under suffers from a major mental disorder.⁶

The impact of homelessness can also be devastating to a child's education because it often causes disruptions that impact their attendance and academic performance. Only 55% of families in the City's shelter system are placed in a shelter in the school district where the youngest child attends school.⁷ As outlined in tremendous detail in the IBO's October 2016 report, *Not Reaching the Door*, homeless children struggle to get to school and are often chronically absent.⁸

Despite the numbers, the obstacles, and the impact of family homelessness, we know that the administration, the providers, the advocates and others have been working hard to prevent homelessness and help families secure permanent housing. We recognize the challenges of doing this in New York City where median income has not been able to keep up with median rent.

We appreciate all of these efforts, but respectfully submit the following recommendations to better address the well-being of children and families in shelter, which also includes increasing access to affordable housing and reducing the length of stay in the shelter system.

¹ The National Center on Family Homelessness, *The Characteristics and Needs of Families Experiencing Homelessness*, Dec. 2011. Available at: <http://www.familyhomelessness.org/media/306.pdf>.

² *Id.*

³ *Id.*

⁴ The National Child Traumatic Stress Network, *Facts on Trauma and Homeless Children*, 2005, at page 2. Available at:

http://www.nctsn.org/nctsn_assets/pdfs/promising_practices/Facts_on_Trauma_and_Homeless_Children.pdf

⁵ *Id.*

⁶ *Id.*

⁷ New York City Mayor's Management Report FY 2016, Department of Homeless Services.

⁸ Independent Budget Office. *Not Reaching the Door: Homeless Students Face Many Hurdles on the Way to School*. October 2016. <http://www.ibo.nyc.ny.us/iboreports/not-reaching-the-door-homeless-students-face-many-hurdles-on-the-way-to-school.pdf>

1) Prioritizing Homeless Children and Their Families: A Report and Recommendations Based on the Work of the Family Homelessness Task Force

The magnitude of the family homelessness crisis and the devastating impact it can have on children is what led CCC to partner with Enterprise and New Destiny to co-convene a Family Homelessness Task Force (FHTF). Together, with about 40 other organizations, we brainstormed recommendations to promote and enhance the well-being of homeless families and those at risk of becoming homeless. Our report and recommendations, included at the end of this testimony, was released at a summit just last week. The “in-shelter” recommendations, which can be found on pages 22-31, are particularly relevant to today’s hearing. As such we submit them for the record as part of this testimony. We encourage the City Council to read the full report, which also includes additional recommendations to prevent family homelessness and to help families who leave the shelter system remain permanently housed.

Some of the key recommendations related to families in the shelter system, from PATH to Permanency, from our report are:

- Reorient the shelter system, from PATH through permanency, to be trauma informed. Begin by providing training in trauma-informed care for all DHS and provider staff in all shelters and at the PATH intake office.
- Improve the conditions for homeless families placed in hotels by:
 - Eliminating the practice of requiring families in hotels to move rooms every 29 days.
 - Ensuring families in hotels have access to laundry.
 - Ensuring families in hotels have access to high quality, palatable food that meets the needs of clients with special dietary restrictions.
 - Creating space in the hotels for children to play and for families to have visitors during specified hours.
 - Providing shuttle service and/or car service reimbursement for homeless hotel residents located further than a 10- minute walk from a subway and those with disabilities who cannot walk to the subway.
 - Ensuring all hotels have regular access to social service staff who are trained in trauma-informed care, to assist with housing, benefits, education, early childhood education, early intervention, accessing health, behavioral health, and child welfare preventive services, and employment training and assistance.
- Place homeless families with children in safe and appropriate settings, and expedite the elimination of cluster site apartments and hotels.
 - Prioritize the movement of some homeless families with children from cluster sites and hotels to Tier II shelters (or preferably permanent affordable housing), such as families with open child welfare cases with the Administration for Children’s Services.
 - Conduct an assessment as part of the intake process, to place the family in an appropriate shelter setting in the most appropriate location for the family. This assessment should examine the following factors: a) health and safety issues; b) the wishes of the family members; c) where the youngest child attends school; d) whether any children have IEPs and services arranged at current school; e) whether the family is receiving community-based child welfare preventive

- services; f) whether any family member is receiving community-based services that would benefit from continuity (such as health, mental health, etc.); g) where the parent(s) work; and h) whether and where children are enrolled in early education programs. If a community-based shelter placement is not initially available for a family who would like one, families should be placed on a waitlist for shelter transfer, and such waitlist should be prioritized based on the outcome of the assessment. The results of the assessment should also identify who should not be placed in shelters in their community of origin.
- Ensure all new shelters are designed to address the well-being of homeless children and their families by appropriately funding providers and ensuring access to high quality services.
 - Reorient the shelter system to be more proactive about helping homeless families with school-aged children, rather than being responsive to parents only after there is a problem identified.
 - Better staff PATH so that every parent with school-aged children can meet with an expert in education, educational stability, McKinney Vento, and transportation while at PATH.
 - Create a better system to arrange busing/transportation than the current process whereby busing cannot begin to be arranged until after the family is found eligible for shelter. This 10-day eligibility process can take substantially longer for families who are not initially found eligible, and thus leads to a tremendous delay in arranging busing.
 - Provide monthly MetroCards (rather than weekly) for families awaiting transportation arrangements.
 - Increase the number of DOE staff troubleshooting education issues for school-aged children in temporary housing from the current 8 staff. Increase the number of family assistants who aid at shelters to better accommodate families placed in hotels.
 - Increase the number of children under 5 receiving early childhood services, including child care and early intervention.

2) Additional Recommendations

In addition to the recommendations developed in collaboration with the FHTF, CCC submits the following three additional recommendations:

a) Consider eliminating or modifying the “no visitor” policy

DHS shelters have a “no visitor” policy, whereby residents cannot have guests in their units/homes. Some shelter facilities have common areas where there can be guests, but many do not. Shelter residents in facilities without these types of common areas cannot have visitors at all. Parents in the focus group conducted by the IBO spoke about the impact the “no visitor policy” created in hampering the ability of their children to make friends in their new school and in the parents’ ability to maintain their support network.

CCC is deeply disturbed by the impact of this rule because we feel it is manufacturing social isolation for parents and their children, which is a well-documented risk factor for child abuse

and neglect.⁹ One well known researcher wrote, “Of course, most poor people do not neglect nor otherwise maltreat their children, but poverty, when combined with other risk factors such as substance abuse, **social isolation**, financial uncertainty, continued family chaos, or a lack of available transportation and affordable child care can put a child at greater risk of child abuse or neglect.”¹⁰

When DHS moves a family from their community of origin to another community, which due to the census is now a common practice, the family is being moved away from their existing social network. By maintaining a “no visitor” policy, families are unable to create a new social network in their new community/home and are unable to have their family and friends visit their new home. Combined with the curfew, it is nearly impossible for adults and children in shelter to maintain connections to their social supports and networks. The current average length of stay of 431 days is a very significant amount of time to be cut off from a social support system.

The removal of social networks of support is the exact opposite of what we want for families struggling with the trauma and stress of homelessness. We know that the histories of many child fatalities, including the Perkins case, include bouts of homelessness.

CCC strongly urges the City to reconsider the “no visitor” policy. We appreciate that this policy is in effect to help ensure safety to the residents in shelter, but we urge the City to re-think how to both protect shelter residents and ensure that homeless families are not isolated from their communities of support by a system that is supposed to be helping them. Options could include requiring common areas for guests; establishing reasonable hours when guests can be in shelter units using a system where guests sign in and out; and/or eliminating the policy completely. In addition, it is important to note that reorienting the shelter system to be more of a community atmosphere with staff trained in trauma, would go a long way towards improving the safety of residents.

In the meantime, we urge the City to ensure any new or renovated Tier II shelter include space for community activities and visitors.

b) Reconsider the proposed amendments to the Health Code, which would preclude shelters from having on-site full-time, long-term child care programs.

The City recently released proposed amendments to Article 47 of the Health Code, for which there will be a hearing before the Board of Health on July 25, 2017. Likely in response to a report by the Comptroller’s office, the City is proposing to prohibit full-time, long-term child care programs at shelters and instead require shelters to have drop-in care that cannot exceed 10 hours per week per child. The Department is also proposing to regulate the health and safety of these programs (which they currently do not), which is a proposal CCC supports.

⁹ There is a great deal of literature about social isolation as a risk factor for child abuse and neglect. For example: DePanfilis, D., United States Department of Health and Human Services, *Child Neglect: A Guide for Prevention, Assessment and Intervention*. 2006. <https://www.childwelfare.gov/pubPDFs/neglect.pdf>. American Psychological Association. <http://www.apa.org/pi/families/resources/understanding-child-abuse.aspx>.

¹⁰ DePanfilis, D., United States Department of Health and Human Services, *Child Neglect: A Guide for Prevention, Assessment and Intervention*. 2006, pp 29-32. <https://www.childwelfare.gov/pubPDFs/neglect.pdf>.

CCC also values the important role early childhood education can play in the life of a young child and that it is critical that these programs be high quality. We believe that there is a value to some shelters choosing to have a full-time, long term child care program, that includes a curriculum, that would be open to both homeless children and children from the community. In fact, not only could this be convenient for the homeless families, but it could help make shelters more appealing to communities.

The proposed rule would limit shelters to having drop-off centers where children could only attend for no more than 10 hours per week. While we appreciate that children should not be “enrolled” long-term in a drop-off program that would not be able to have a curriculum that builds from day to day, we think that this arbitrary 10-hour per week limit will not work for families in the shelter system. First, shelter is intended to be short-term and temporary. If the system was functioning this way, a short-term program might be most appropriate so that the child could then be enrolled in a long-term program once placed in permanent housing. While many families spend years in shelter, we do not think we should design the system around this premise. Second, ten hours feels arbitrary. Two days per week in child care would be 16 hours. Many parents have a lot of appointments to get to (such as public assistance, job interviews, housing searches, and medical care), as well as other children to get to and from school. Given the many hardships that come with being in the shelter system, the child care programs should be easily accessible and available to any and all families in need.

c) Expand home visiting programs and other evidence-based models that provide important supports for parents.

Home visiting programs, such as Nurse-Family Partnership and Healthy Families New York, have been proven to improve outcomes for the vulnerable and at-risk children and parents participating in the programs. Given the trauma, stress and housing instability of homeless families, we believe these programs should be more readily available to families in shelter and that the City should be intentional about shelters collaborating with these programs.

In addition, CCC has long-supported the City Council initiative that funds trauma- based programs for young children in shelter. We look forward to working with the Council to document these successes so that we can advocate for an expansion.

3) City Council Legislation

- a) *Int. 1597-2017: A local law to amend the administrative code of the city of New York, in relation to requiring the department of homeless services recognize time spent in foster care as homelessness for the purpose of meeting rental voucher eligibility requirements.*

CCC strongly supports this bill and urges the City Council to support it and for the Mayor to sign it into law. For any youth 24 years old or younger who is a foster youth or former foster youth, included those who achieved permanency through adoption or guardianship after the age of 16, would be able to use the time they spent in foster care as time homeless for their eligibility for rental assistance.

In short, this bill would help prevent foster youth and former foster youth from becoming homeless. Unfortunately, former foster youth have incredibly high rates of homelessness.

By enabling youth who achieved permanency to also have access, we ensure that this new eligibility would not create the perverse incentive for youth to age out of care rather than achieve permanency. This is the same standard that is used by the federal level for eligibility for Education and Training Vouchers (ETVs), which help pay for college.

We do urge the City Council and the Administration to make one amendment to the bill, which would enable youth who reunify from foster care after age 16 to also be eligible for LINC.

For many years, CCC has been trying to secure state statutory change to increase the child welfare housing subsidy from \$300 to \$600 per month and to increase the upper age of eligibility from 21 to 24, but we have been unsuccessful. The City Council has passed a resolution in support of this state law change. For youth on public assistance, this bill would go a long way towards addressing the issue we were attempting to address at the state level, by providing a substantial rental assistance subsidy up to age 24.

b) *Int. 1642-2017: A local law to amend the administrative code of the city of New York, in relation to rental assistance vouchers*

This bill would require eliminate time-limits on city rental assistance programs (for those otherwise eligible) and index maximum rental allowances to the fair market rent. CCC supports this bill.

In short, this bill would enable New Yorkers using rental assistance vouchers to remain stably housed rather than re-enter the shelter system. By ensuring that there is no arbitrary time-limit on a rental assistance voucher and by ensuring the amount of the voucher is indexed to the fair market rent, the New Yorkers using these rental assistance vouchers should be able to remain permanently housed in their apartments. This will be a tremendous benefit to the families and will also benefit the City by reducing the shelter population.

CCC is grateful to the City Council for its commitment to homeless families. We look forward to working together to finalize these important pieces of legislation and to improving the homeless service system for children and families.

Thank you for the opportunity to testify.



Prioritizing Homeless Children and Their Families

**A Report and Recommendations
Based on the Work of
the Family Homelessness Task Force**

June 2017

We would like to thank our sponsors, Deutsche Bank Americas Foundation and JPMorgan Chase,
for supporting the Family Homelessness Task Force.

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Executive Summary

Despite what many imagine a homeless person in New York City to look like, nearly 70% of the people in the City's shelter system are children and their families. In fact, over 27,000 children sleep in New York City homeless shelters each night¹, many of whom had been in the shelter system for over a year. These numbers and the research on the impact that homelessness has on children, led Citizens' Committee for Children (CCC), Enterprise Community Partners (Enterprise), and New Destiny Housing (New Destiny) to convene the Family Homelessness Task Force (FHTF). The FHTF is a group of stakeholders from over 40 organizations with expertise in housing, homelessness, and child well-being, which came together to call more attention to the needs of homeless children and their families and to develop and advance recommendations to prevent and end family homelessness, while ensuring the well-being of families living in shelter.

The City and the State have taken important steps to address the homelessness crisis. Access to representation in housing court for all low-income New Yorkers, the increase in the Family Homelessness and Eviction Prevention Supplement rental subsidy, and the expansion of HomeBase, the City's evidence-based model for homelessness prevention, all help children and their families remain in their homes. New rental assistance programs such as LINC and commitments from the City and State to build more supportive and affordable housing will help families obtain and retain permanent housing. And the Mayor's newest plan, *Turning the Tide*, aims to end the practice of placing homeless families in cluster sites and hotel rooms, by creating new service-rich shelters that will enable more appropriate placements for children and their families. The three co-conveners and the Family Homelessness Task Force recognized these investments and accomplishments and the recommendations in this report build on the important work already underway.

Ending family homelessness and promoting the well-being of homeless children and their families will require a coordinated approach between housing and homeless services to effectively address family homelessness. CCC, Enterprise and New Destiny are committed to advancing the recommendations in this report. We look forward to a continued collaboration with our partners both inside and outside government to ensure every child has a safe, stable, and permanent home and access to the services and supports that are needed to thrive.

¹ Including DHS, HRA Domestic Violence, HPD, and DYCD administered shelters.

The Recommendations

A) Prevention: Keep Children and Families in Their Homes

<p><u>Recommendation One</u></p> <p>The State should strengthen its rent-stabilization policies and, in collaboration with the City, improve enforcement of existing policies to prevent the further loss of rent-stabilized units. In addition, the City should educate consumers about tenant rights in rent-stabilized housing to help keep families in their homes.</p>	<ul style="list-style-type: none"> • The State should remove the \$2,700 decontrol rent threshold and put into place much narrower parameters, if any, for deregulation. • The State should ensure that legal rents are accurately registered and consider making the Rent Guidelines Board rent increases apply to the preferential rent. • The State should build upon the accomplishments of DHCR’s Tenant Protection Unit by increasing its capacity and staffing levels to ensure that landlords register rents with the State. • The City, State, and the service provider community should work in partnership to ensure tenants have access to the information, legal services, and rental assistance that will enable them to remain housed in their rent stabilized units.
<p><u>Recommendation Two</u></p> <p>The City, State, service providers and the philanthropic community should invest in prevention strategies that target families at all levels of housing stability to help families avert a housing crisis.</p>	<ul style="list-style-type: none"> • The City should broaden the notion of what constitutes homelessness prevention services, beyond HomeBase, legal assistance and rental subsidies, and explore the development of a tool that will help households assess their level of housing stability and connect them to needed services depending on where they fall on the housing stability spectrum. • The City should increase the capacity of organizations that provide services and resources that are inextricably linked to housing stability.
<p><u>Recommendation Three</u></p> <p>The City, with the support of the philanthropic community and nonprofit domestic violence experts, should develop safe alternatives to shelter for families headed by domestic violence survivors who can remain in their existing housing or move directly to permanent housing.</p>	
<p><u>Recommendation Four</u></p> <p>The City should support State approval of Assembly Member Andrew Hevesi’s Home Stability Support (HSS) program and agree to fund the gap between the State’s share (85 percent of Fair Market Rent) and 100 percent of Fair Market Rent.</p>	

B) In-Shelter: Promote and Strengthen the Well-Being of Children and Their Families While in Shelter

<p><u>Recommendation One</u></p> <p>The City should place homeless families with children in safe and appropriate settings that meet their needs and improve their well-being.</p>	<ul style="list-style-type: none"> • The City should place homeless families with children in safe and appropriate settings, and expedite the elimination of cluster site apartments and hotels. • The City should take immediate steps to improve the living conditions of families residing in hotels. • The City should adequately fund non-profit providers to deliver high-quality shelter and services rooted in evidence-based practices and an intergenerational approach. • The City should implement best practice standards in all new and renovated purpose-built shelters. • The City should streamline and improve the application and intake process for homeless families with children.
<p><u>Recommendation Two</u></p> <p>The City should increase funding and modify policies to improve the educational outcomes of homeless children by better addressing educational continuity, reducing absenteeism, and increasing the enrollment of young homeless children in early childhood education and Early Intervention programs.</p>	<ul style="list-style-type: none"> • The City should be required to inform families at the PATH Intake Center about their education rights, the processes for ensuring educational stability and arranging transportation, and the assistance available to families to navigate those processes. • The City should increase the number of staff available to help families year-round, and ensure staff have adequate supervision and accountability measures. • The City should increase the number of homeless young children enrolled in early education and Early Intervention programs. • The Department of Education and the Department of Homeless Services should convene a working group with shelter providers, family assistants, staff from DOE’s Office of Pupil Transportation and advocates to review and where appropriate, design and implement new procedures to make education access and transportation more seamless for children in shelter.

C) Post Shelter: Help Homeless Families with Children Obtain and Retain Quality Affordable Housing with Access to Services

<p><u>Recommendation One</u></p> <p>The City and State should increase the supply of permanent affordable housing resources available to homeless families by including or increasing set-asides for homeless families in existing zoning, tax incentive, and publicly funded housing programs.</p>	<ul style="list-style-type: none"> • HPD and City Planning should amend Mandatory Inclusionary Housing (MIH) to require developers to provide at least 10% homeless units in a project. • HPD should require that developers using the Affordable New York Housing Program (formerly 421-a) set aside at least 10% of their units for homeless families and individuals. • HPD should require that 50% of HPD’s community preference be used for homeless families located in the community district where HPD- funded projects are constructed or preserved. • HPD should increase the flexibility of existing program term sheets, for developers interested in providing homeless set-asides exceeding 30% but less than 60% of the project units. • NYCHA, with City and/or State funding, should use vacant public housing units requiring rehabilitation to provide permanent housing to homeless families.
<p><u>Recommendation Two</u></p> <p>The City and State should target, standardize and streamline the allocation of existing homeless housing resources.</p>	<ul style="list-style-type: none"> • HPD and HRA should use cross-systems information about homeless families in the shelter databases to target available subsidies and/or homeless resources more appropriately. • HPD and HRA should standardize inspection standards across rental subsidy programs. • HPD and HRA should work together to prioritize and fast-track the application review process and the inspection of units intended for homeless families.
<p><u>Recommendation Three</u></p> <p>The City should strengthen post-shelter services and explore new service models to improve permanent housing retention by homeless families with children.</p>	<ul style="list-style-type: none"> • The City, with the support of the philanthropic community, should encourage the piloting of an evidence-informed service-enriched housing model for vulnerable homeless families not qualifying for NYC 15/15 housing. • HRA/DHS should fund aftercare services at existing shelters. • HPD should facilitate the provision of voluntary services in HPD-funded projects housing 10% or more homeless families with children. • The City should enhance and publicize the existing 311 Helpline.

D) Systemic Recommendations

Recommendation One

The City should create an integrated housing and homelessness plan focused on homeless families with children and create a subcommittee of the interagency coordinating council that includes advocates, service providers and formerly homeless family members to monitor that plan and ensure that the needs of homeless children and their families are addressed.

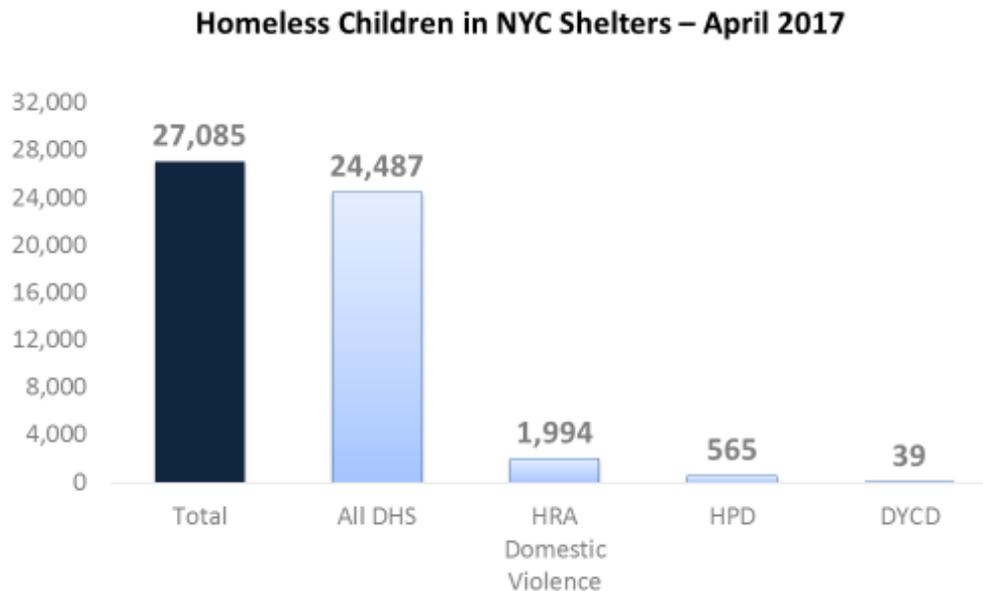
Recommendation Two

The City should track and make public data about homeless families with children as well as information about the allocation of housing and homeless housing resources to homeless families with children.

I. Introduction

Over 27,000 children slept in a New York City homeless shelter in April 2017. This includes children in domestic violence shelters, Department of Homeless Services shelters, and other city shelters serving families with children.

Family Homelessness by the Numbers



*All DHS includes DHS administered shelters, safe haven shelters, stabilization beds, and veteran shelters
Source: DHS Local Law 37 report: http://www1.nyc.gov/assets/operations/downloads/pdf/temporary_housing_report.pdf

While children, almost half of whom are under age 6², are perhaps not the typical image of a homeless person, children and their families comprise nearly 70% of the City’s Department of Homeless Services shelter system.³ The profile of a typical homeless family with children is a female-headed minority household (91%), whose average age is 34 years old, with an average of two children.⁴ Nearly a third of the heads of household are working despite nearly half lacking a high school diploma or GED.⁵ About 25% have an open child welfare case with the Administration for Children’s Services.⁶

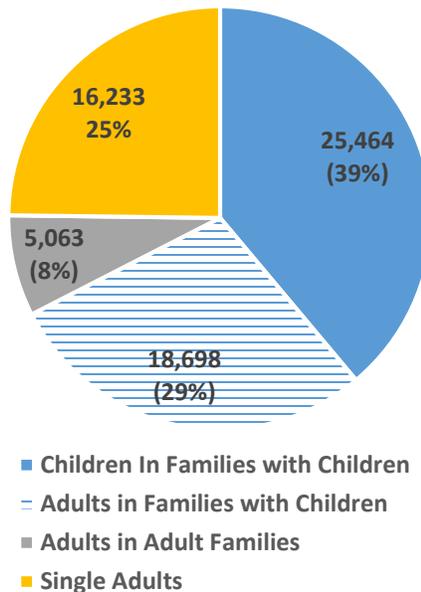
² DHS unpublished data provided to CCC. January 2015. This is a national trend as well. U.S. Department of Health and Human Services, U.S. Department of Housing and Urban Development, U.S. Department of Education. *Policy Statement on the Needs of Families with Young Children Experiencing and at Risk of Homelessness*. October 31, 2016.

³ New York City Department of Homeless Services Data Dashboard. December 2015. <https://www1.nyc.gov/site/dhs/about/stats-and-reports.page>

⁴ DHS unpublished data provided to CCC. January 2015.

⁵ Id.

⁶ Id.



**DHS Shelter System
December 2015:**

44,432 (68%) of shelter residents are children or adults in families with children

Given both the number of homeless children and families and the impact homelessness has on them, it is critical that City and State leaders, advocates, providers, and every day New Yorkers focus more on how to prevent family homelessness, create and preserve affordable housing units for homeless families with children, promote the well-being of children and families who are homeless, and decrease the return rate for families leaving the shelter system.

The de Blasio and Cuomo Administrations, and their partners, have devoted significant attention and resources to homelessness. For example, the City has expanded eviction prevention services including a right to counsel, created new rental assistance programs, and expanded its HomeBase homelessness prevention program. The City and State have also developed and implemented new affordable and supportive housing plans. The de Blasio administration estimates that without these key initiatives, there would be over 70,000 people in Department of Homeless Services (DHS) shelters, rather than holding stable at its current level of about 60,000.⁷

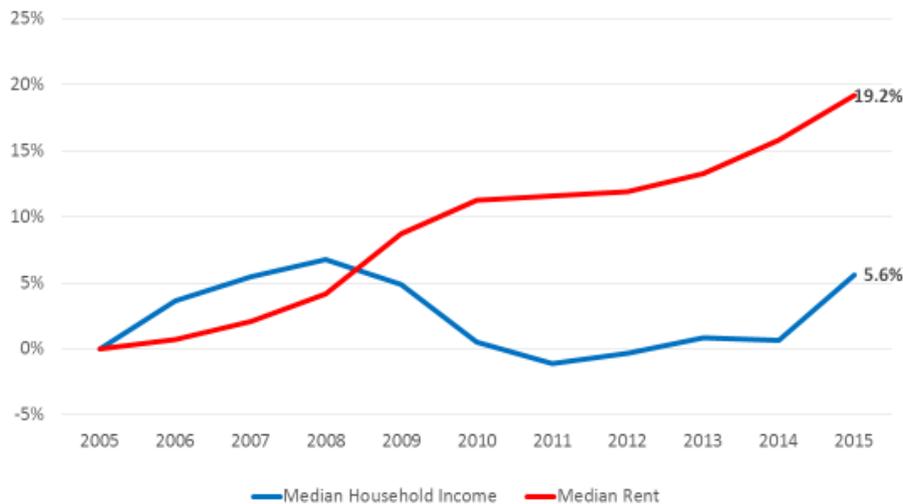
The leading drivers of homelessness are eviction and domestic violence.⁸ Another major factor that has driven New York City's homelessness crisis is that median rent has not kept pace with median household income in New York City. The result of which is that families simply cannot afford to pay rent.

⁷ The City of New York. *Turning the Tide on Homelessness in New York City*. February 2017. <http://www1.nyc.gov/assets/dhs/downloads/pdf/turning-the-tide-on-homelessness.pdf>

⁸ New York City Independent Budget Office. November 2014. http://www.ibo.nyc.ny.us/iboreports/2014dhs_families_entering_NYC_homeless_shelters.html

Family Homelessness by the Numbers

**Growth in NYC Median Household Income Compared to Median Rent
(In 2015 Dollars)**

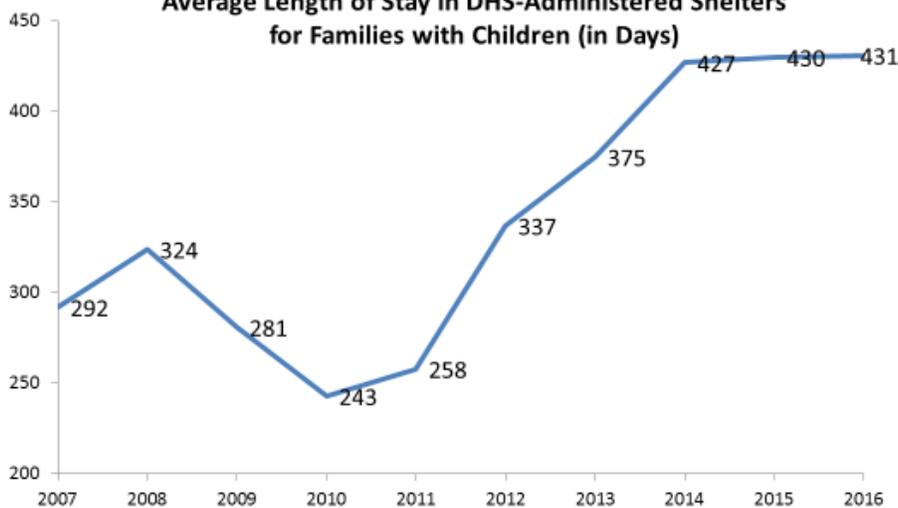


Source: American Community Survey

This dearth of affordable housing has led to long shelter stays for those families who are in the shelter system. Since 2014, the average length of stay for a family with children in a DHS-administered shelter has been approximately 430 days.

Family Homelessness by the Numbers

**Average Length of Stay in DHS-Administered Shelters
for Families with Children (in Days)**



Source: New York City Mayor's Management Reports

With a critical right to shelter in New York City, the long lengths of stay, and the shortage of affordable housing, the City’s Tier II shelters—shelter built to serve homeless families—have been unable to keep up with the demand. As a result, only 58% of homeless families with children in the DHS shelter system are residing in Tier II shelters; 22% are in cluster sites and 20% are in hotels/motels.

The City’s newest plan, *Turning the Tide* (“The Plan”), recognizes that cluster sites and hotels/motels are not appropriate shelter facilities for families. The Plan seeks to eliminate the use of cluster sites by 2021 and hotels/motels by 2023, in part by creating 90 new shelters and renovating 30 others. The Plan also seeks to employ a borough-based approach whereby the goal is for homeless families to be able to remain in their home borough when it is safe and appropriate to do so.

Preventing homelessness, reducing the time families spend in shelter and promoting their well-being during that time, and helping families remain permanently housed after leaving shelter are all critical to mitigating the tremendous impact that homelessness has on children and their development. The data and research paint a disturbing picture of the effect of homelessness on the well-being of children. Even in the best of circumstances, homelessness creates life-long risks to the physical and emotional well-being and educational success of children. For example, children experiencing homelessness have an increased risk of illness compared to children who are not homeless: they suffer from four times as many respiratory infections; five times as many gastrointestinal infections; and twice as many ear infections.⁹ Additionally, they are four times as likely to suffer from asthma and have high rates of asthma-related hospitalizations.¹⁰ Homeless children also suffer disproportionately from food insecurity, as they are twice as likely to go hungry as non-homeless children, and due to these nutritional deficiencies, they are at an increased risk of obesity.¹¹

Being homeless can also be harmful to children’s emotional well-being. Homelessness causes traumatic disruptions in the lives of children, who, in addition to losing their homes, experience loss of their friends and community, sense of security, routines, possessions, and privacy.¹² Homelessness also makes families more vulnerable to other forms of trauma, such as witnessing violence, physical or sexual assault, and abrupt separation from family members.¹³ As a result, homelessness increases a child’s risk of experiencing mental illness. For example, half of school-age homeless children experience anxiety, depression, or withdrawal, compared to 18 percent of children who are not homeless, and one in three homeless children ages eight and under suffers from a major mental disorder.¹⁴

⁹ The National Center on Family Homeless, *The Characteristics and Needs of Families Experiencing Homelessness*, Dec. 2011. Available at: <http://www.familyhomelessness.org/media/306.pdf>.

¹⁰ *Id.*

¹¹ *Id.*

¹² The National Child Traumatic Stress Network, *Facts on Trauma and Homeless Children*, 2005, at page 2. Available at:

http://www.nctsn.org/nctsn_assets/pdfs/promising_practices/Facts_on_Trauma_and_Homeless_Children.pdf

¹³ *Id.*

¹⁴ *Id.*

The impact of homelessness can also be devastating to a child's education because it often causes disruptions that impact their attendance and academic performance. In New York City, only 55% of families are placed in the same borough where the youngest child was attending school.¹⁵ As indicated by the New York City Independent Budget Office, homeless children have high rates of absenteeism, which is associated with lower academic performance, increased drop-out rates and reduced college and career preparedness.¹⁶

It is imperative that New Yorkers come together as a community to address this crisis. This means that government, advocacy groups, service providers, landlords and communities themselves must come together and prioritize the needs of homeless children and their families. The research shows that if we do not do this, we increase the chances that the next generation of New Yorkers will struggle in school and face intergenerational poverty and homelessness, as well as increased health and mental health costs. The co-conveners brought together the members of the Task Force believing that if we put our collective minds together we could improve the lives of thousands of children and their families, both today and in the future, while reducing the burden on New York City taxpayers.

II. About the Family Homelessness Task Force (FHTF)

The Family Homelessness Task Force (FHTF) was convened by Citizens' Committee for Children, Enterprise Community Partners and New Destiny Housing ("the co-conveners") to call attention to the needs of homeless children and their families and to develop and advance recommendations to prevent and end family homelessness, while ensuring the well-being of families living in shelter. Our concerns about the well-being of the thousands of homeless children growing up in a shelter system, often not designed for that purpose, was the catalyst for the creation of the Family Homelessness Task Force.

The FHTF consists of approximately forty stakeholders representing the service provider, affordable housing and advocacy communities with expertise in homelessness, housing and child well-being. The FHTF was divided into three working groups to address key components of the homelessness system – prevention, in-shelter and post-shelter services. Each group was asked to generate a body of policy and programmatic recommendations that would together strengthen the prevention, permanent housing and service options available to reduce and eliminate homelessness, while also improving the experiences of children and their families while in shelter.

Consumer participation and a Philanthropic Advisory Committee were both critical aspects of the FHTF.¹⁷ Consumers who were at risk of or experienced homelessness were organized into three focus groups. The first focus group discussed consumers' experiences with prevention

¹⁵ New York City Mayor's Preliminary Management Report FY 2017, Department of Homeless Services.

¹⁶ Independent Budget Office. *Not Reaching the Door: Homeless Students Face Many Hurdles on the Way to School*. October 2016.

¹⁷The Philanthropic Advisory Committee included Capital One, Deutsche Bank, Goldman Sachs, JP Morgan Chase, Mizuho, New York Community Trust, New York Women's Foundation, Robin Hood Foundation and Santander.

services, making suggestions for how to improve both knowledge of and access to such resources. The second focus group consisted of homeless families living in a commercial hotel who spoke to the need to improve the shelter intake process as well as the shelter experience itself, particularly for those living in hotels. The third focus group provided input on the process required to obtain affordable housing and the experience of transitioning from shelter to permanent housing. The FHTF also received input and feedback from a Philanthropic Advisory Committee, comprised of foundations and private corporations that have invested in solutions to homelessness and have perspective on best practices from across the City and from other localities.

Throughout the process, the FHTF recognized the significant efforts of the City, the State and the providers to end the City's family homelessness crisis. The recommendations in this report are intended to build upon the important work underway and include the input and ideas of the members of the Family Homelessness Task Force. It is important to note that this document has not been vetted and endorsed by all Task Force members.

III. Recommendations of the Workgroups: Prevention, In-Shelter and Post-Shelter

The recommendations in this report span the prevention, shelter and post-shelter service components of the homelessness system. The prevention recommendations are focused on keeping families and children in their homes so that they never experience homelessness. The in-shelter recommendations are focused on promoting and strengthening the well-being of children and their families while in shelter. The post-shelter recommendations are focused on obtaining and retaining quality housing and services children and their families experiencing homelessness and ensuring those who leave the shelter system do not return.

Each component of the system— prevention, in-shelter and post-shelter – is critical to ending the homelessness crisis for children and their families and must be addressed in concert. Furthermore, while the FHTF organized around these three components separately, they are inextricably linked to one another.

A) Prevention: Keep Families and Children in Their Homes

The top three drivers of family homelessness in NYC are domestic violence, evictions and overcrowding.¹⁸ Compounding this is the shortage of affordable housing. The high level of demand for shelter is likely to continue if the growing divide between rising rents and stagnating wages continues.

The City has put forth a tremendous amount of effort over the last several years to decrease the number of families entering the shelter system. The creation of rental assistance programs such as LINC and the expansion of HomeBase, the City's evidence-based model for

¹⁸ New York City Independent Budget Office. November 2014.
http://www.ibo.nyc.ny.us/iboreports/2014dhs_families_entering_NYC_homeless_shelters.html

homelessness prevention, have helped prevent the City's homelessness crisis from reaching 70,000 individuals in the system.¹⁹ This will be further strengthened by the City's commitment to add 15,000 units of supportive housing over the next 15 years, expand the number of HomeBase sites, and provide all low-income New Yorkers with access to representation in Housing Court.

Simultaneously, the State has committed \$2.5 billion for the preservation or creation of 100,000 affordable housing units and 5,000 supportive housing units. This will help increase much-needed housing supply for homeless families.

Additionally, the State's increase in the Family Homelessness and Eviction Prevention Supplement (FHEPS) rental subsidy amount will help many families, including those headed by victims of domestic violence at risk of homelessness, remain in their homes. There is also growing momentum for Home Stability Support, which if enacted, would provide a "statewide rent supplement for families who are eligible for public assistance and who are facing eviction, homelessness or loss of housing due to domestic violence or hazardous living conditions."²⁰ Home Stability Support would prevent thousands of vulnerable families from entering the shelter system altogether.

Despite the efforts from the City and the State, family homelessness persists at unsustainable levels with 13,000 entering in FY2016. It is critical that the City, State, service provider and philanthropic communities make additional efforts to prioritize homelessness prevention and ensure children and their families can remain in their homes and out of the shelter system.²¹ It is critical that the City, State, service provider and philanthropic communities make additional efforts to prioritize homelessness prevention and ensure children and their families can remain in their homes and out of the shelter system.

This section addresses four main issue areas that, if addressed, can help keep families with children in their homes by: 1) preventing the loss of rent-stabilized units; 2) advocating for investment in prevention strategies that target families at all levels of housing stability; 3) developing safe alternatives to shelter for domestic violence survivors and their children; and 4) supporting Home Stability Support, a rental subsidy that focuses on homelessness prevention.

¹⁹ The City of New York. *Turning the Tide on Homelessness in New York City*. February 2017. <http://www1.nyc.gov/assets/dhs/downloads/pdf/turning-the-tide-on-homelessness.pdf>.

²⁰ Home Stability Support. <http://www.homestabilitysupport.com/about-overview>

²¹ Preliminary Fiscal Year 2017 Mayor's Management Report, Department of Homeless Services. This trend continued in the first 4 months of FY17 when 5,168 families entered shelter compared to 4,508 during the same time period in FY16. <http://www1.nyc.gov/assets/operations/downloads/pdf/pmmr2017/dhs.pdf>

Recommendation 1:

The State should strengthen its rent-stabilization policies and, in collaboration with the City, improve enforcement of existing policies to prevent the further loss of rent-stabilized units. In addition, the City should educate consumers about tenant rights in rent-stabilized housing to help keep families in their homes.

- 1) The State should remove the \$2,700 decontrol rent threshold and put into place much narrower parameters for deregulation, if at all.**

Over the course of 18 years, from 1994 – 2012, the City experienced a net loss of approximately 150,000 rent-stabilized units.²² The City cannot sustain this loss rate of rent-stabilized units in the face of such an acute housing affordability crisis.

There are a variety of ways in which a rent-stabilized unit becomes de-regulated. The primary driver of deregulation is the high rent vacancy deregulation, which accounted for the vast majority of the 150,000 rent stabilized units that were lost due to deregulation. Specifically, when the rent reaches the threshold of \$2,700, regardless of unit size, the landlord can deregulate the unit. This Deregulation Rent Threshold (DRT) of \$2,700 creates an incentive for landlords to evict tenants and/or use other methods to increase rents to the level of the DRT, triggering deregulation of a unit.

- 2) The State should ensure that legal rents are accurately registered and consider making the Rent Guidelines Board rent increases apply to the preferential rent.**

Every rent-stabilized apartment has a maximum legal rent that landlords are required to register with the New York State Department of Homes & Community Renewal (DHCR) every year. Landlords may, however, offer the unit at a lower rent called a “preferential rent”-- a rent that is lower than the legal regulated rent that the owner could collect from the tenant. For an owner to preserve the legal regulated rent when they are charging a preferential rent, the legal rent must be written in the lease where the preferential rent was first charged. In many cases, the preferential rent can be revoked at the end of a lease unless the terms of the lease specify that the preferential rent cannot be terminated for that tenancy.

While the preferential rent can be beneficial to residents, many landlords abuse the use of preferential rents by stating a false legal rent to tenants and then substantially increasing rents at the end of a lease term or a tenancy. Mechanisms should be put into place to more effectively regulate the use of the preferential rent and rent increases when a preferential rent is being used. To eliminate the incentive for landlords to abuse the use of preferential rents, the State should consider making preferential rent increases subject to the same Rent Guidelines Board rent increases to which legal rents are held. Additionally, there must be greater oversight

²² The City of New York. *Turning the Tide on Homelessness in New York City*. February 2017. <http://www1.nyc.gov/assets/dhs/downloads/pdf/turning-the-tide-on-homelessness.pdf>.

of the maximum legal rent that landlords are required to register with DHCR every year. With minimum oversight, landlords can easily file false legal rents and then raise rents to unaffordable levels.

3) The State should build upon the accomplishments of DHCR’s Tenant Protection Unit, by increasing its capacity and staffing levels to better hold landlords accountable, especially in relation to preferential rents and the registration of units.

The practice of using false legal rents and a preferential one to increase rent amounts is one example of how a landlord might abuse rent-stabilization policies as they are currently designed. When a building is subject to rent-stabilization, the developer is required to register that unit with the State until the status expires, but too often there are no consequences if the unit is not registered. The City has lost many rent-stabilized units due to non-registration, but there is currently not enough staff to fully enforce these rules. Over the past five years, the DHCR Tenant Protection Unit, through its enforcement efforts, brought over 50,000 units back into regulation. Increasing the number of staff could dramatically increase DHCR’s ability to protect and maintain rent-stabilized units.

In addition, strengthening the partnership between the State and the City would also help with greater oversight. For example, HPD has started to revoke 421-a and J-51 tax benefits from developers who are not registering their projects with the State—a process which should continue.

4) The City, the State and the service provider community should work in partnership to ensure tenants have access to the information, legal services and rental assistance that will enable them to remain housed in their rent-stabilized units.

As part of the effort to keep families in their homes and prevent the loss of rent-stabilized units, the City, State and service providers need to engage in a full-scale education effort to ensure that tenants know their rights, targeting tenants living in regulated and recently deregulated rent-stabilized units. This is especially important for the preservation of rent-stabilized units 1) when a tenant is being charged above the legal rent, especially one that they cannot afford; and 2) when a tenant is unlawfully being pushed out of a stabilized unit.

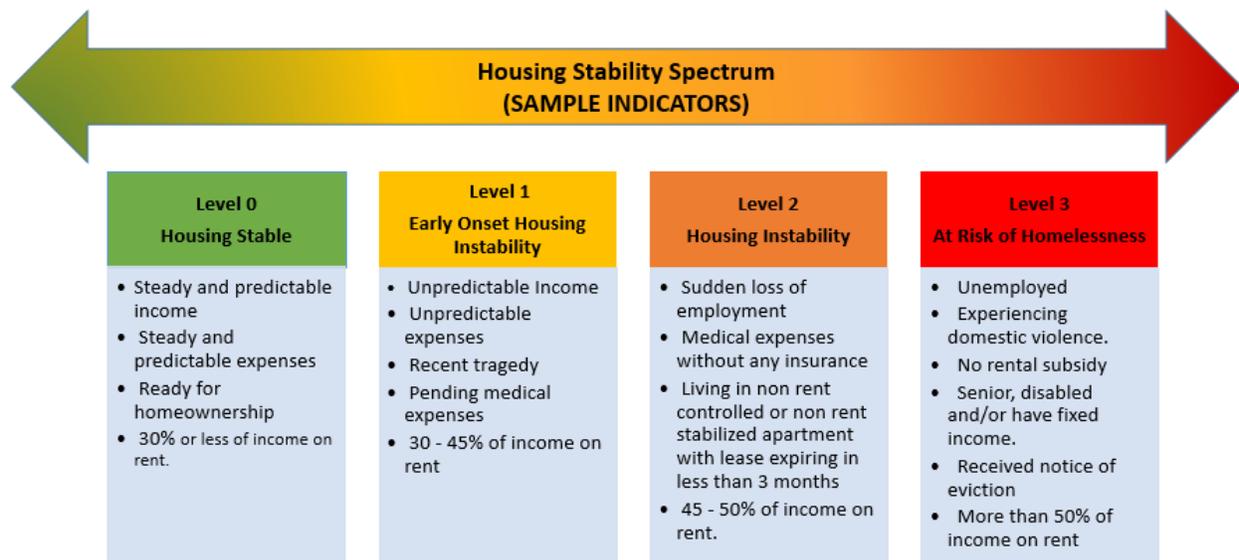
The provision of strong and flexible legal services that can provide the appropriate level of intervention that a tenant requires to protect their housing rights is critical. Furthermore, the State and the City should continue building and strengthening rental assistance programs that help tenants meet their rent obligations and remain in place, preventing homelessness.

Recommendation 2:

The City, State, service providers and the philanthropic community should invest in prevention strategies that target families at all levels of housing stability, especially in upstream efforts that help families avert a housing crisis.

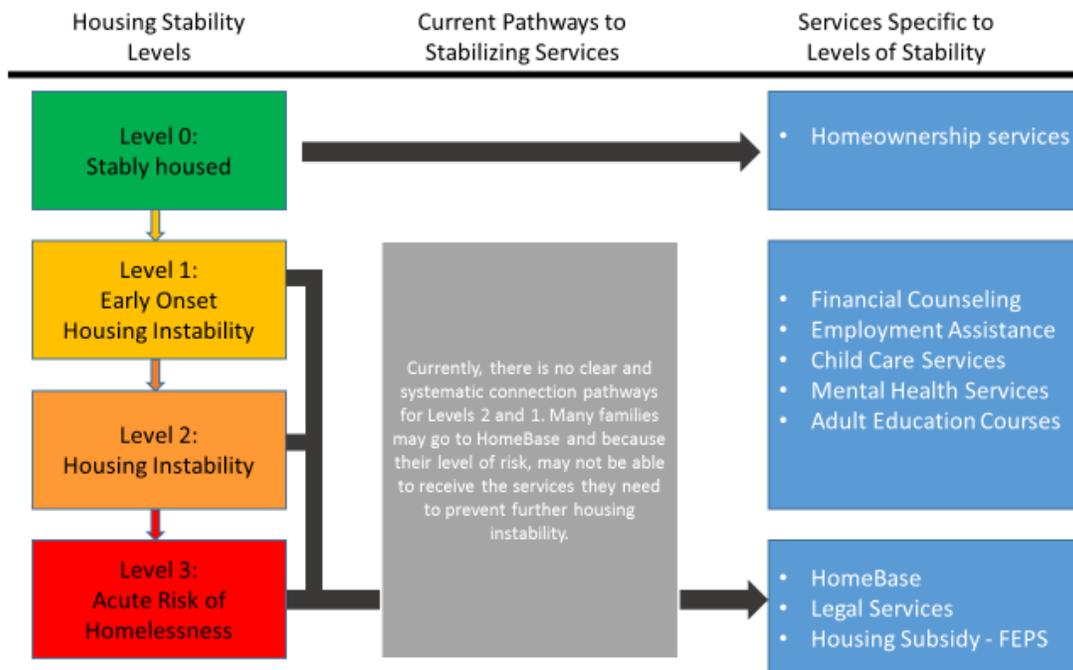
- 1) The City should broaden the notion of what constitutes homelessness prevention services, beyond HomeBase, legal assistance and rental subsidies, and explore the development of a tool that will help households assess their level of housing stability and connect them to needed services depending on where they fall on the housing stability spectrum.

All families fall somewhere along a spectrum between housing stability and extreme instability, with some being more stable and secure in their housing than others. The chart below provides one example of a spectrum of housing stability risk – from low/no risk (Level 0) to high risk (Level 3). A family who is in Level 0 and is housing stable would likely have no trouble paying their rent from month to month, have emergency savings to cover at least three months of living expenses and may even be ready for home ownership. On the other end of the spectrum, a family in Level 3 and at acute risk of homelessness may be experiencing domestic violence, have received a letter from their landlord, is in housing court, and/or is unemployed with no steady source of income to cover their housing costs. The factors under each level are sample indicators of housing stability (or instability) and a family need not be experiencing these characteristics to meet the criteria for a certain level, but can use the characteristics to self-identify where they may fall on the spectrum.



The image below illustrates the spectrum of housing stability, the various service interventions relevant at each level and the current lack of pathways and connections to those various types of services. As the system is currently designed, families at all levels of housing instability who know about HomeBase are directed there for services. However, there is a segment of families,

especially in Levels 2 and 1, that are not eligible for HomeBase or for whom HomeBase is not the most appropriate service because their risk of homelessness is not yet high enough for HomeBase services.



As such, the City should broaden the notion of what constitutes homelessness prevention services beyond HomeBase, legal assistance and rental subsidies. The City’s plan to use data analytics to “improve its ability to accurately assess the risk factors that lead to homelessness and then reach out to families at risk to provide help to prevent it,”²³ is a promising step in this direction. This type of housing stability tool could help identify where families fall on a spectrum of housing stability and then match those families to resources and opportunities depending on their level of stability. Nonprofit providers could help clients understand the indicators on the tool and then link them to appropriate services.

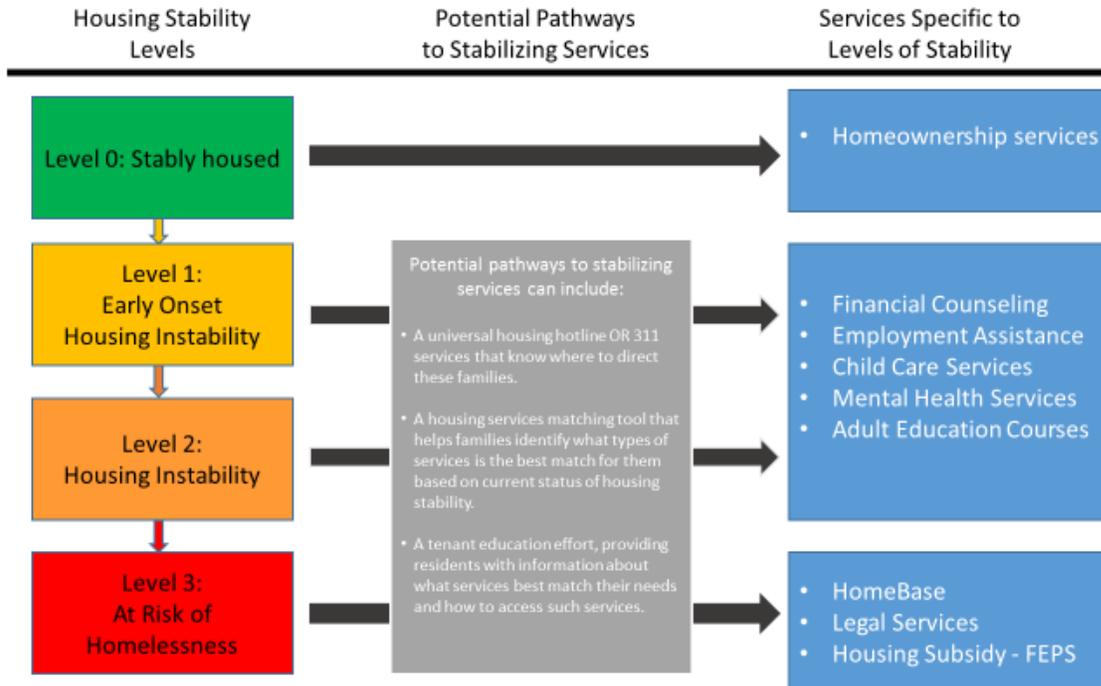
In addition to a tool, the City should consider enhancing 311 to include a directory of services connected to housing stability for families depending on where they fall on the housing stability spectrum. Further, the City should create a 311 team dedicated to housing stability whose function would be to ensure families are connected with the appropriate housing stability service. An alternative to a 311 enhancement is the creation of a dedicated housing hotline that is available to any household 24/7 and can be used to find services that will ensure housing stability.

Finally, a tenant education effort will be critical to promoting long-term housing stability. This effort would entail several components. First, it would encourage families to identify where they fall on the housing spectrum and understand what types of resources would help both

²³ Turning the Tide, page 22.

prevent instability and promote greater stability. Second, it would encourage preventative behavior, encouraging families to seek assistance as early as possible. Finally, this type of tenant education effort should be able to direct residents to the resources and services they get matched to through the services matching tool described above.

The image below shows how a combination of a housing services matching tool, a tenant education effort and an enhanced 311 (or a 24/7 housing hotline) can together potentially direct families to the appropriate services needed to retain housing.



2) The City should increase the capacity of organizations that provide services and resources that are inextricably linked to housing stability.

Families with children, particularly those struggling with housing stability, often have varied service needs that if not addressed can lead to homelessness. It is critical that families facing housing instability at any level, can access the services that could alleviate their risk factors. These services include but are not limited to child care, after-school programs, adult education, domestic violence counseling, substance abuse treatment, mental health services, health care, child welfare prevention programs, GED programs, ESL programs, workforce development, and financial counseling services. For the City to prevent homelessness, families with children will need to have access to the types of services that enable families to successfully participate in the workforce and comprehensively meet the health and development needs of the entire family. For families to have such access, these services also need to have the capacity to meet any increased demand because of such a tool described above. The City should ensure that all organization that can help strengthen overall housing stability and prevent risk of homelessness have the capacity to deliver services to those individuals that need them.

Recommendation 3:

The City, with the support of the philanthropic community and nonprofit domestic violence experts, should develop safe alternatives to shelter for families headed by domestic violence survivors who can remain in their existing housing or move directly to permanent housing.

Domestic violence is a major generator of family homelessness in New York City. Many families seek shelter because they are fleeing an unsafe situation and do not have access to other options. Over 3,000 DV survivors were in homeless shelters in NYC on the night of the 2016 Continuum of Care Point in Time Count.²⁴

For many individuals experiencing domestic violence, shelter with services tailored to their needs is the best and safest option; however, avoiding the additional trauma of homelessness could provide a healthier and less disruptive, as well as a less expensive, alternative to shelter for some families experiencing domestic violence. Two programs offer examples of how this could be achieved. The Washington State Coalition Against Domestic Violence and Home Free in Portland, Oregon have successfully pioneered and then brought to scale evidence-based rapid rehousing programs that help survivors either remain in their existing housing or relocate to other permanent housing quickly.

Both programs identify domestic violence survivors before they apply for shelter at locations such as social service and public assistance offices. After assessing their domestic violence, family and financial situations, program staff work with survivors to help them remain, where possible, in their existing housing or find permanent housing in the private market by offering short-term rental assistance and connections to landlords and non-residential social services.

New York City currently has two programs that could, with additional resources and tweaking, replicate the successes of the Washington State Coalition Against Domestic Violence and Home Free programs. HRA operates Alternatives To Shelter (ATS) that helps survivors who can safely do so remain in their existing housing. Because ATS requires survivors to obtain an Order of Protection and to be able to afford their housing without assistance, it has remained relatively small. A safety assessment by domestic violence experts instead of an Order of Protection and the availability of rental assistance could expand the use of this program significantly with better outcomes for adults and children who would experience less disruption to their lives.

The second program is a rapid rehousing program, Project HOME, being piloted by the Mayor's Office to Combat Domestic Violence's Family, which links clients of three borough-based Family Justice Centers who have been screened for safety and income with appropriate units in existing housing. Pre-screening, technical assistance, post-placement follow up, and short-term rental assistance are critical elements of the program. Results to date have been positive, with

²⁴ HUD 2016 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations, New York City Continuum of Care, Point-in-Time Date: 2/9/2016.

over forty families placed in housing and a 100 percent retention rate.²⁵ Expansion of this program to all the Family Justice Centers could increase the number of families headed by domestic violence survivors who could move directly to safe permanent housing as an alternative to shelter.

Recommendation 4:

The State should enact Assembly Member Andrew Hevesi’s Home Stability Support (HSS) proposal and then the City should fund the gap between the State’s share (85 percent of Fair Market Rent) and 100 percent of Fair Market Rent.

Home Stability Support (HSS) is a proposed statewide rental supplement for families and individuals eligible for public assistance benefits who are facing eviction, homelessness, or loss of their housing because of domestic violence or dangerous housing. If enacted, HSS would cover the gap between the existing shelter allowance and 85% of the fair market rent (FMR) as determined by HUD and be 100% Federal and State-funded. As currently proposed, local districts would be permitted, at their own expense, to raise the supplement from 85% FMR to 100% FMR.

It is critical that the State Legislature and the Governor work together to enact Home Stability Support into law as soon as possible. Furthermore, should the law pass as currently proposed, the City should fund the difference between 85% and 100% of the FMR.

B) In Shelter: Promote and Strengthen the Well-being of Children and Their Families While in the Shelter System

While the ultimate goal of the City’s and State’s responses to family homelessness must be to prevent homelessness, increase affordable housing options, and help homeless families move to permanent housing as quickly as possible, steps must also be taken to better promote and strengthen the well-being of children and their families while they reside in any NYC homeless shelter. The shelter facilities in which families with children live must be safe and adequate, with services that meet the needs of both children and their families.

Near-record numbers of families live in the DHS shelter system, including nearly over 22,000 children from nearly 13,000 families, comprising almost 70% of New York City’s shelter occupants. They endure extended lengths of stay that now average 431 days, but often last for much longer. Many have experienced, and continue to experience, a significant amount of trauma.

Only 58% of the families in the DHS shelter system reside in Tier II, shelters. The remaining families live in cluster site apartments (22%) and Motels/Hotels (20%), with the percentage of families in hotels continuing to increase. Cluster site apartments and hotels were not originally

²⁵ New Destiny Housing. June 2017.

built to serve as shelters. This causes a variety of hardships for families, including unresolved safety violations (particularly in cluster sites), challenges in providing services to the families, and inadequate public transportation options. Most cluster sites and hotels do not have kitchens, laundry rooms or spaces for socializing or community gatherings.

For many children in shelter, school and early education programs could provide a structural consistency in their lives; however, students in NYC homeless shelters have the highest rates of absenteeism.²⁶ In school year 2013-2014, only 34.3% of homeless children had “good attendance”, as compared to 73.5% of the students not in temporary housing.²⁷ This data are from a school year when approximately 65.4% of families found eligible for shelter were placed in the borough where the youngest child attended school²⁸ as compared to more recent data from Fiscal Year 2016 when only 55% of families with children who were found eligible for shelter were placed in the borough where the youngest child attended school.²⁹ This indicates that homeless children’s school attendance has likely decreased further in the more recent school years.

This section addresses two main issues that affect the well-being of homeless families with children: 1) safe and appropriate shelter placement; and 2) barriers within the shelter and education systems that impact educational outcomes for homeless children.

Recommendation 1:

The City should place homeless families with children in safe and appropriate settings that meet their needs and improve their well-being.

All City-funded shelters should promote and enhance the well-being of families with children, at all points in the process, including when families enter the shelter system, while they are residing in temporary housing, and as they transition to permanent housing. This should apply to shelters in both the DHS and HRA Domestic Violence systems, and to all facility types, including existing Tier II shelters, cluster sites and hotels, as well as all new shelters and transitional housing residences developed in the future.

²⁶ In 2013-2014 school year, 31.9% of students in shelters were chronically absent (absent 10-20% of the school year) and an additional 33.9% were severely chronically absent (absent > 20% of the school year). Independent Budget Office, *Not Reaching the Front Door: Homeless Students Face Many Hurdles on the Way to School*. October 2016.

<http://www.ibo.nyc.ny.us/iboreports/not-reaching-the-door-homeless-students-face-many-hurdles-on-the-way-to-school.pdf>.

Fiscal Year 2014 Mayor’s Management Report, Department of Homeless Services.

http://www1.nyc.gov/assets/operations/downloads/pdf/mmr2014/2014_mmr.pdf

²⁷ “Good attendance” is absent less than 10% of the school year. Independent Budget Office, *Not Reaching the Front Door: Homeless Students Face Many Hurdles on the Way to School*. October 2016. <http://www.ibo.nyc.ny.us/iboreports/not-reaching-the-door-homeless-students-face-many-hurdles-on-the-way-to-school.pdf>

²⁸ <http://www1.nyc.gov/assets/operations/downloads/pdf/mmr2016/dhs.pdf>.

²⁹ Fiscal Year 2016 Mayor’s Management Report, Department of Homeless Services.

<http://www1.nyc.gov/assets/operations/downloads/pdf/mmr2016/dhs.pdf>

1) The City should place homeless families with children in safe and appropriate settings, and expedite the elimination of cluster site apartments and hotels.

Cluster site apartments and hotels are not appropriate for use as shelter facilities for families with children. Buildings containing cluster site apartments are often poorly maintained, and typically have numerous safety violations that, through the City's own admission, have proven both numerous and difficult to repair in a timely manner.³⁰ In addition to these conditions, providing services to families in cluster sites is challenging. Hotels (including motels) are built for short-term stays. They often do not have facilities that families require, such as kitchens for food preparation, laundry rooms, recreational space for children and adults, and space for the provision of on-site services. In addition, many hotels are in locations far from public transportation, making it difficult for parents to work, take their children to school and child care, and keep social service appointments.

The Mayor's Plan, *Turning the Tide*, seeks to eliminate the use of cluster sites and hotels for all homeless placements. The plan envisions opening 90 new shelters, including 25 new purpose-built sites, and renovating about 30 existing shelters to expand capacity, to enable the phasing out of cluster sites by 2021 and hotels by 2023.³¹ The City and the State should take additional steps to expedite the achievement of these goals, by increasing the number of permanent affordable housing units available to homeless families and streamlining the subsidy application and housing placement processes.³² The Administration should also consider prioritizing the movement of some homeless families with children from cluster sites and hotels to Tier II shelters (or preferably permanent affordable housing), such as families with open child welfare cases with the Administration for Children's Services.

The Mayor's Plan also commits to a shelter system that provides improved services to families, as well implementing a borough-based placement approach for those families wishing to stay in their communities—recommendations, which when implemented, will promote and enhance the well-being of homeless families with children.

2) The City should take immediate steps to improve the living conditions of families residing in hotels.

So long as hotels continue to be used for shelter, the City should make needed investments and policy and practice changes to improve the living conditions of families with children placed in hotels. Making hotels adequate environments for homeless families with children is

³⁰ There were nearly 13,000 open violations in cluster sites in April 2017. Shelter Scorecard Summary, April 2017, NYC Mayor's Office of Operations. <https://www1.nyc.gov/assets/operations/downloads/pdf/Shelter-Repair-Scorecard-Archive/scorecard-2017-apr-summary.pdf>

³¹ *Turning the Tide on Homelessness in New York City* (2017), at page 84.

<http://www1.nyc.gov/assets/dhs/downloads/pdf/turning-the-tide-on-homelessness.pdf>

³² This FHTF Report includes additional recommendations aimed at reducing the shelter population such as the statewide creation of Home Stability Support rental vouchers to prevent and end homelessness, and enhancing services available to those who leave shelter to permanent housing.

challenging. The following steps could, however, mitigate the negative impacts to families in hotels:

- Eliminate the practice of requiring families in hotels to move rooms every 29 days.³³
- Ensure families in hotels have access to nutritious, palatable food that meets the needs of clients with special dietary restrictions, to compensate for the lack of kitchens in most hotels.
- Create space in hotels for children to play and for families to have visitors.
- Provide shuttle service and/or car service reimbursement for homeless hotel residents with mobility impairments, and for residents of hotels located further than a ten minute walk from a subway.
- Ensure all hotels (and cluster sites) have regular access to social service staff who are trained in trauma-informed care and able to assist with housing, benefits, education (transportation/enrollment), early education, access to services (health, behavioral health, child welfare preventive, etc.), and employment training and assistance.
- Ensure there is appropriate space at hotels for clients to meet with service providers in confidential settings.

Much of the above could be accomplished by being creative about the use of hotel space, including lobbies, parking lots, and space currently used as rooms.

3) The City should adequately fund non-profit providers to deliver high-quality shelter and services rooted in evidence-based practices and an intergenerational approach.

Connecting families with children to permanent, affordable housing is critical to stabilizing their lives, and should continue to be the City's primary response to ending family homelessness. With shelter stays in NYC averaging well over a year, providing quality services in shelter offers a promising way to help increase homeless families' long-term housing stability. The positive effects of such services can be increased by delivering them using a multi-generational approach rather than directing them solely at the family's head of household.

Several social service interventions have been tested and proven to be effective at improving mental health and reducing the negative effects of trauma. These evidence-based practices include interventions such as Mental Health First Aid, Motivational Interviewing and Trauma-Informed Care. Applying trauma-informed care in the shelter environment is an especially promising strategy. Homeless children and families typically endure trauma prior to entering the shelter system, which is compounded by the experience of homelessness itself. According to the Bassuk Center on Homeless and Vulnerable Children & Youth, 90% of homeless mothers have experienced extreme trauma, such as interpersonal violence, and the children are exposed to stressors that can have a lifelong impact.³⁴

The Mayor's Plan suggests implementing evidence-based programs as part of the service model for families in shelter. Accordingly, the City should provide training in trauma-informed care to

³³ A practice/policy design to avoid invocation of tenancy rights under NYC Tenant Law.

³⁴ The Bassuk Center web site. <http://www.bassukcenter.org/trauma-informed-care/>, visited 5/5/17.

all staff working with homeless families in the NYC system as soon as possible. The City could look to the *Trauma Smart* model being implemented in Early Learn child care programs, the trauma-informed interventions currently funded through the City Council, and the work the Bassuk Center is doing with the Gateway Housing Initiative, as possible models to implement more broadly.

4) The City should implement best practice standards in all new and renovated purpose-built shelters.

The Mayor's Plan's commitment to a borough-based placement approach for those families wishing to stay in their communities, and to shelters that provide improved services to families in a safe, clean living environment, should help improve the well-being of homeless children and their families.

In implementing *Turning the Tide*, the City should ensure that any new or renovated Tier II shelter serving families with children be a purpose-built shelter facility operated by a high quality non-profit provider able to meet best practice standards, including the following elements:

- The facility must be safe.
- Families must have adequate living space for their family size. Shelters should also provide families with access to space for cooking, laundry, and social interaction. There should be spaces for community activities, as well as spaces that allow guests to visit. There should be a safe space for children to play.
- Families should have access to the services they need, either on-site or through a referral to a nearby location. These services include housing assistance, education and employment training that prepares adults for living wage jobs, health and mental health services, domestic violence counseling, substance abuse programs, GED programs, benefit assistance, ESL programs, child care, after-school, and summer programs.
- Social workers, education and early education specialists, and housing specialists must be available on-site, and have appropriate office space to allow for private meetings with families, as well as appropriate respite space for staff to recharge on breaks.
- Access to drop-off child care and after-school programs, either on-site or nearby.
- Services must be trauma-informed.
- Staff can help families prepare for, and transition to, permanent housing.

For community-based organizations to operate high-quality purpose-built shelters that are safe, well-maintained and infused with services and supports, the shelter providers must be reimbursed at an appropriate rate. The funding must support the provision of high-quality services, retention of qualified staff, reduction of staff/family ratios, additional on-site specialists, and ongoing maintenance costs. The work that is currently underway, with providers and the administration to develop a model budget for shelter providers is promising.

The City and the State should take additional steps, including:

- Allow for a portion of the rate to fund ongoing maintenance costs.
- Allow shelter providers to maintain a facility reserve that can be used for timely repairs.
- Ensure additional resources for facility repairs are easy to access in a timely manner.
- Ensure the provider rate is sufficient to ensure appropriate staffing levels of qualified, well-compensated staff.
- Index the provider rate so that over the course of a multi-year contract, shelters continue to have sufficient resources to adequately maintain the building and provide appropriate services rather than deferring maintenance or curtailing services to keep pace with other rising costs.
- DHS/DSS and OTDA should allow for long term contracts (20 years or more) to facilitate the financing of purpose built shelters using bonds or other sources of capital.

5) The City should streamline and improve the application and intake process for homeless families with children.

In New York City, homeless families with children must apply for shelter at the PATH Family Homeless Intake Center³⁵ in a process that can be one of the most traumatizing elements of a homeless episode. Trauma can be lessened and the process made more efficient by implementing the following improvements:

- Continue efforts to reduce, or preferably eliminate, the need for children to accompany parents to PATH for applications and appointments.
- Continue efforts to streamline eligibility determinations and placements for:
 - Families moving from the domestic violence (DV) shelter system to the DHS family shelter system;
 - Families with children in foster care;
 - Victims of human trafficking; and
 - Asylum applicants.
- Prioritize families for community-based shelter placement by using an assessment to determine whether it is safe and in the best interests of the family to be placed in a shelter in or near their community of origin.³⁶
- Revise all PATH notices denying shelter or requiring additional information so that they are in plain, easy to understand language, that is clear, concise and in the language clients speak, so that they can understand what they need to do to resolve their cases.
- For families denied shelter on the basis that they can return to a recommended housing option (RHO) who then return to shelter stating they cannot access the RHO, PATH staff

³⁵ This does not apply to families with children entering the domestic violence shelter system.

³⁶ This assessment should examine the following factors: a) health and safety issues; b) the wishes of the family members; c) where the youngest child attends school; d) whether any children have IEPs and services arranged at current school; e) whether the family is receiving community-based child welfare preventive services; f) whether any family member is receiving community-based services that would benefit from continuity (such as health, mental health, etc.); g) where the parent(s) work; and h) whether and where children are enrolled in early education programs. If a community-based shelter placement is not initially available for a family who would like one, families should be placed on a waitlist for shelter transfer, and such waitlist should be prioritized based on the outcome of the assessment. The results of the assessment should also identify who should not be placed in shelters in their community of origin.

should accompany the family to the RHO and determine whether it is viable option. If it is not, PATH should no longer consider the RHO in the eligibility determination.

- Ensure all staff at PATH are trained in trauma-informed care, as many discussions, including those about why a family cannot return to an RHO, often involve discussing past incidents of trauma.
- Offer a wider array of food options, including child-friendly meals, at PATH.
- Strengthen the Staten Island Intake/HomeBase Pilot by co-locating DSS/DHS staff at the HomeBase office. Such staff should have the power both to determine eligibility, and to place a family in temporary housing without the need for the family to go to the PATH Center in the Bronx.³⁷
- Implement similar pilots in Manhattan, Brooklyn and Queens.

Recommendation 2:

The City should increase funding and modify policies to improve the educational outcomes of homeless children by better addressing educational continuity, reducing absenteeism, and increasing the enrollment of young homeless children in early childhood education and Early Intervention programs.

Increasing access to quality early education and education is essential to helping homeless children achieve successful life outcomes. The City should take a more proactive approach to increase participation in early childhood education and Early Intervention services, and to reduce chronic absenteeism among homeless children, so that they can fully participate in school and early education programs.

Several systemic barriers to educational continuity face homeless families and children. For many, the most significant issue impacting school attendance and participation in early childhood programs is placement in a shelter far from the schools and programs they were attending before entering the shelter system. Resolving this placement issue, through the assessment discussed previously, will go a long way toward helping many families and will make the transportation arrangement tasks more manageable for City staff helping the smaller number of families not placed in or near their communities of origin.

Additional systemic issues include:

- Many staff assisting homeless families with educational issues do not work evenings, weekends or summer months. This includes both staff at the PATH intake center and DOE Students in Temporary Housing (STH) Family Assistants helping families placed in shelters.

³⁷ There is currently a pilot where homeless families with children can be assessed for shelter eligibility at the Staten Island HomeBase office. If the family is found to be in need of shelter, the family still has to go to the PATH intake office in the Bronx for placement.

- Few families are informed of their right to keep children in their school of origin, or about the availability of transportation, how to arrange it, and who can help them, when they first enter the shelter system.³⁸
- The Department of Education (DOE) provides bus service only for K – 6 students who have been found eligible for shelter. This does not cover students during the ten-day conditional approval period (or longer, if the family must apply for shelter more than once).³⁹
- Bus service is not available to children in prekindergarten, child care, middle school or high school (unless the child has a special need).
- While bus service is being arranged, families can request a weekly MetroCard from the DOE Family Assistant, at their shelter placement, or at a DOE borough office, but these already stretched parents must return **each week** to get a new card.
- There are not nearly enough staff on-site at shelters to support families with educational issues. There are approximately 115 DOE STH Family Assistants and eight DOE STH Content Experts helping parents troubleshoot education issues for over 22,000 school-aged children in temporary housing. These staff do not work during the summer, even though there is often an increase in families entering the shelter system in the summer months, and their assistance is particularly necessary prior to the start of the school year.
- There is no strong management, accountability structure, or feedback mechanism for these staff, often leaving them struggling to resolve issues for families, or unaware of the education-related issues with which families in shelter are contending. Without a formalized management structure, there is no quality assurance/improvement mechanism nor manager focused on addressing systemic change for repeat barriers.
- Half of the children in shelter are under five years old, but many are not enrolled in EarlyLearn child care, Head Start or other early education programs. To date, the City has only focused on enrolling homeless four-year-olds in prekindergarten programs and not enrolling younger children in child care or Head Start programs.
- Homeless children 0-3 years old are not routinely referred for Early Intervention evaluations, even though many are likely eligible for free services.

1) The City should be required to inform families at the PATH Intake Center about their education rights, the processes for ensuring educational stability and arranging transportation, and the assistance available to families to navigate those processes.

All families with school-aged children entering PATH intake should have the option to meet with an Education Specialist, regardless of time of day, day of the week, or month of the year they are at PATH. In addition, every family should leave PATH with a handout that includes information and instructions about their educational rights, including school transportation,

³⁸ The Department of Education currently has two staff members assigned to PATH, but neither works at night, on weekends, or during the summer. None of the participants in the “in shelter” focus group recalled meeting with a DOE staff member at PATH.

³⁹ For most families, the conditional approval process lasts 3-5 weeks.

enrollment options for schools and child care programs, and contact information of those who can help them once they are placed in temporary housing.

2) The City should increase the number of staff available to help families year-round, and ensure staff have adequate supervision and accountability measures.

All families in a shelter placement, regardless of whether it is a hotel, cluster site or Tier II, should have access to an educational specialist. Specifically, every Tier II shelter should have an educational specialist and, until cluster sites and hotels are eliminated, there must be enough educational specialists for these staff to regularly visit each hotel and cluster site to which they are assigned.

The City should increase the number of staff who are available to help families with educational issues and ensure that these staff and the STH Program Staff have a management structure with clearly articulated roles and expectations as well as a data-driven accountability system that provides for the identification and resolution of individual and systemic issues. It is critical that educational assistance be available year-round, including during the summer months.

3) The City should increase the number of homeless young children enrolled in early education and Early Intervention programs.

Families with children under five (who make up about half of the population of children in shelter) should be provided with information about the early education opportunities available, particularly considering the expansion of full day prekindergarten for all four-year-olds, the creation of prekindergarten for three year-olds and the availability of EarlyLearn child care programs.

While there is a new subsidized child care priority for homeless children, it excludes families where a parent has a sanctioned Public Assistance case, is exempt from the work requirements, or is on SSI. The City should expand upon the current homeless priority, and make all homeless children categorically eligible for subsidized child care programs.

Due to the expansion of the full-day prekindergarten program to all four-year-olds, the City has been deliberate in seeking to enroll homeless four-year-olds in prekindergarten programs by providing shelter providers with lists of children due to be four years old. The City should take a similar approach with homeless children 0-3. Furthermore, full-day prekindergarten programs are the full school day and not available during the summer, so families of four-year-olds should also be advised of the availability of subsidized child care programs. In addition, families with children under three should be informed of their rights to have their child evaluated for free Early Intervention services and how to obtain these services for free if their child is eligible.

The Education Specialist should be tasked with helping parents enroll their children in these programs because the enrollment process can be difficult to navigate; providing information is not enough. More children in shelters must receive the benefits of early education and Early

Intervention, which have been proven to improve life outcomes, particularly for low-income children growing up in high-stress environments like homeless shelters.

- 4) The Department of Education and the Department of Homeless Services should convene a working group with shelter providers, family assistants, staff from DOE's Office of Pupil Transportation and advocates to review and, where appropriate, design and implement new procedures to make education access and transportation more seamless for children in shelter.**

There are several systemic issues that lead to delays in the arrangement of transportation. This working group should map out the current processes and identify ways that this process can become more seamless. We encourage this group to track key data points to see if they improve such as number of days from PATH intake until transportation is arranged; the absenteeism rate; the number of children enrolled in EarlyLearn, prekindergarten and 3-K (prekindergarten for three-year-olds); and the number of children evaluated for Early Intervention.

The federal McKinney-Vento law, and New York's implementing legislation, now require districts to arrange for transportation of homeless children to prekindergarten programs. This working group can also ensure the successful implementation of this new law.

In the meantime, the City should provide every family awaiting for bus transportation to be arranged with a monthly (not weekly) MetroCard and the first MetroCard should be provided at PATH without the need for the family to go to a DOE office. Families should be provided with a City-funded car service if the shelter or school is not accessible by public transportation or if the parent cannot access public transportation, until busing is arranged.

C) Post-Shelter: Helping Homeless Families with Children Obtain and Retain Quality Affordable Housing with Access to Services

While many of the Administration's efforts have started to have a noticeable impact on homeless families with children, the homelessness crisis is far from over. A critical component to permanently resolve this crisis is to ensure that when families with children leave the shelter system, they are able to remain stably housed. Unfortunately, families who leave shelter often return, sometimes several years later; in fact, 45% of the people in shelter have been there before in the last 5 years.⁴⁰ The rate of return for families tends to be higher than for single adults or adult families.

Family homelessness is a complex problem. This section addresses three aspects of the problem: 1) the need for more permanent housing affordable to homeless families with

⁴⁰ Coalition for the Homeless. *State of the Homeless 2017, Rejecting Low Expectations: Housing is the Answer*. March 2017. <http://www.coalitionforthehomeless.org/wp-content/uploads/2017/06/CFH-State-of-the-Homeless-2017.pdf>.

children; 2) the need to reduce the length of stay in shelter; and 3) the need to prevent the repeated return of homeless families to shelter.

Recommendation 1:

The City and State should increase the supply of permanent affordable housing resources available to homeless families by including or increasing set-asides for homeless families in existing zoning, tax incentive, and publicly funded housing programs.

The permanent housing resources currently available to homeless families with children – rental subsidies, public housing, and City-funded developed or preserved units—are overwhelmed by the scale of the need. Very few units in the Mayor’s ambitious 200,000 unit 10-year housing plan are designated for homeless families with children, who represent almost 70% of the users of shelters.

In CFY 2016 2,875 households (singles and families) received LINC vouchers.⁴¹ During the same period, 2,612 homeless families (adult families and families with children) were placed in public housing or received a Section 8 voucher from HPD or NYCHA.⁴²

In CFY 2016, about 600 units of new or preserved housing for Extremely Low Income (ELI) households closed.⁴³ We do not know how many of these units were designated for homeless households versus other ELI households or how many of the units allocated to the homeless were for families with children versus individuals. In the same year, HPD began construction of about 1,000 supportive housing units under the Supportive Housing Loan Program. Most of those units were for homeless singles, although again we do not know the exact breakdown. It should also be noted that these numbers represent “housing starts” not completed units ready for move in.

Under the current administration, City-funded rental subsidies combined with the use of federal resources—public housing and Section 8—have helped to reduce the number of homeless families in shelters. However, the City—and the State—need to be much more aggressive if we are to significantly reduce the number of families with children using homeless shelters.

1) HPD and City Planning should amend Mandatory Inclusionary Housing (MIH) to require developers to provide at least 10% homeless units in a project.

Under Mayor Bloomberg’s administration, large sections of the City were upzoned to permit more residential development at higher densities. Mayor de Blasio has used Mandatory

⁴¹ New York City Human Resources Administration/Department of Social Services. Unpublished data. 2017.

⁴² Coalition for the Homeless. *State of the Homeless 2017, Rejecting Low Expectations: Housing is the Answer*. March 2017. <http://www.coalitionforthehomeless.org/wp-content/uploads/2017/06/CFH-State-of-the-Homeless-2017.pdf>.

⁴³ New York City Housing Preservation and Development. Unpublished data. 2017.

Inclusionary Housing (or Mandatory Inclusionary Zoning) to trade additional density, resulting from either neighborhood rezoning or individual requests by developers for zoning increases, for affordable housing guarantees.

The new policy, approved in 2016, grants a density bonus to developers who agree to make a portion of their newly developed units permanently affordable. Much of the controversy around MIH has had to do with the levels and amounts of affordable housing required in return for zoning bonuses, with affordable housing advocates arguing that more units affordable to lower income households should be built into the program.

The current MIH should be amended to require developers to allocate at least 10% of the units to be developed for homeless families, with a preference to be given to homeless families living in the community board where the project is located. HPD could incentivize developers to provide the 10% or higher homeless family set asides by providing additional subsidy.

2) HPD should require that developers using the Affordable New York Housing Program (formerly 421-a) set aside at least 10% of their units for homeless families and individuals.

The Affordable New York Housing Program (formerly 421-a tax exemption) is a tax incentive program for the new construction of multiple dwellings. In CFY 2016, 73,494 421-a exemptions—or 65% of all residential tax exemptions of all residential buildings in New York City—were approved by HPD and enacted by the Department of Finance. The next highest exemption program used—J-51—comprised only 20% of the residential units that received tax exemptions.⁴⁴

In January 2016, the 421-a program ended when the State Legislature failed to agree on proposals for reforming 421-a, which triggered a sunset clause in the legislation. The program was recently re-authorized, amended and renamed the Affordable New York Housing Program as part of the State’s 2018 budget.

HPD, in the meantime, has used its regulatory authority to require that projects receiving past 421-a tax exemptions set-aside at least half of their community preference units, which are 50% of at least 20% of the total apartments in the project, for people living in the same community district as the project. HPD’s homeless requirement should continue for future projects receiving the Affordable New York Housing Program exemption.

3) HPD should require that 50% of HPD’s community preference be used for homeless families located in the community district where HPD- funded projects are constructed or preserved.

⁴⁴ Department of Finance, Division of Tax Policy. *Annual Report of the New York City Property Tax – Fiscal Year 2016*. September 2016. https://www1.nyc.gov/assets/finance/downloads/pdf/reports/reports-property-tax/nyc_property_fy16fmvandav.pdf.

Developers required to use HPD marketing guidelines for their projects may be required to give an occupancy preference to applicants who are residents of the Community District where the project is located. Fifty percent of that local preference could be for homeless households residing in shelters in the Community District since HPD has the authority to use all or a portion of the various set-asides and preferences required in its marketing plan for households residing in shelter.

4) HPD should increase the flexibility of existing program term sheets for developers interested in providing homeless set-asides exceeding 30% but less than 60% of the project units.

HPD recently revised its existing program term sheets to ensure that all new housing production and some preservation programs require at least 10% of the project units funded to be allocated to homeless households. The Our Space program, which provides up to \$140,000/unit for units at the shelter rent, is being used in conjunction with these programs to incentivize developers to provide housing for previously homeless individuals and families.

Nevertheless, there is still a gap between the maximum homeless requirement under programs targeted to non-supportive housing developers and supportive housing developers. The Extremely Low & Low-Income Affordability Program (ELLA) permits up to 30% of the units in the project to be allocated to homeless families or individuals. The Supportive Housing Loan Program (SHLP), on the other hand, requires that 60% of the units in projects funded under this program be set aside for homeless households.

Developers, especially nonprofit developers, interested in providing housing for homeless families or individuals through set-asides higher than 30% but less than 60% do not fit HPD program guidelines and are in the position of trying to sell their projects to either ELLA or SHLP. Making existing HPD programs more flexible for developers, particularly nonprofit developers, interested in providing affordable housing with significant set-asides for homeless households would increase the number of HPD-funded units developed specifically for the homeless.

5) NYCHA, with City and/or State funding, should use vacant public housing units requiring rehabilitation to provide permanent housing to homeless families.

An estimated 2,000 NYCHA units are vacant and off-line. Some of those units have become vacant because of normal turnover; others are off-line due to needed repairs, storm damage, or code violations. Bringing those latter units online presents challenges given the limitations of NYCHA's operating budget. However, an allocation of City and/or State capital funding to make vacant NYCHA units habitable, along with an operating commitment, in return for allocating them to homeless families and individuals, could create a new homeless housing resource relatively quickly while providing NYCHA with needed operating funding.

Recommendation 2:

The City and State should target, standardize, and streamline the allocation of existing homeless housing.

The current City administration has created an innovative rental subsidy program, Living in Communities or LINC, to address the differing situations of families and individuals using shelters. The six LINC subsidies, in addition to FHEPS, Section 8, and other rental subsidy programs for special needs populations, are administered by different agencies and governed by the requirements of different funding sources. The array of subsidies and their differing requirements can be confusing, for recipients and landlords alike. HRA and HPD, two of the main agencies administering NYC rental subsidies, could align their requirements and procedures, making them more transparent to recipients and more user-friendly to landlords through the specific interventions described below.

- 1) HPD and HRA should use cross-systems information about homeless families in the shelter databases to target available subsidies and/or homeless resources (e.g., NYCHA public housing units and HPD homeless set-aside units) more appropriately.**

Homeless housing resources (e.g., LINC, FEPS, Section 8 HCV, NYCHA public housing, HPD homeless units) could be better allocated to maximize the stability of previously homeless families. These subsidies are managed by different agencies with different policies responding to different funding streams. As a result, a homeless family with high barriers to housing stability—a young mother with no work experience, little education and very young children—might receive a short term LINC subsidy that assumes the mother can carry rent when the subsidy ends, while families where the head of household is working part-time and is engaged in an educational program might receive a Section 8 Housing Choice Voucher. Cross-agency cooperation and data-sharing between HRA and HPD, or the centralization of homeless housing resources, as is anticipated under the Coordinated Assessment and Placement System (CAPS) that is being developed, would help to ensure that homeless families are being assigned the most appropriate subsidy or housing option given the situation of that household.

- 2) HPD and HRA should standardize inspection standards across rental subsidy programs.**

The differing inspection and application requirements, as well as rent payment levels, are often confusing for landlords. The rigorous inspection requirements for some programs versus others lengthen the period that units remain vacant and result in rental income losses for housing operators—a frequent cause of frustration with subsidy programs among developers/managers. When there are different inspection requirements, it creates competition among the rental subsidy programs, which results in developer preferences for some programs over others. Homeless families with certain subsidies may have greater difficulty finding landlords willing to accept their rental vouchers because of landlord concerns about the timing and stringency of the inspection process. Making inspection requirements more uniform would make the differences among programs—such as LINC—invisible to

landlords and would discourage the likelihood of cherry-picking among various subsidy programs.

3) HPD and HRA should work together to prioritize and fast-track the application review process and the inspection of units intended for homeless families.

To the extent possible, HPD and HRA should prioritize the inspection of units intended for homeless families with HPD taking the lead for all inspections. The review of rental subsidy applications for homeless applicants should be streamlined to facilitate the movement of families from shelter to permanent housing.

Recommendation 3:

The City, State, providers, and philanthropic community should strengthen post-shelter services and explore new service models to improve permanent housing retention by homeless families with children.

The overwhelming majority of homeless families with children are headed by a single parent, often a female of color, who has young children. Homeless family household heads are also likely to have an extremely low income, little education, and lack employment and independent living experience—all factors that can pose barriers to housing stability.

Family supportive housing is targeted to vulnerable families where the head of household has a severe, persistent mental illness or medical disability. Over the next 15 years, 2,087 of the 15,000 supportive housing units to be developed under the NYC 15/15 program will come on line for families meeting these criteria. Although some highly vulnerable homeless families with children will qualify for supportive housing, most homeless families will leave shelters for privately-owned housing, HPD-funded housing with homeless set-asides, NYCHA public housing, and unstable doubled-up housing situations—all of which have few, if any, linkages to social service programs.

Some families will undoubtedly be able to maintain housing stability provided they continue to receive a rental subsidy. However, many other families will remain at risk of homelessness—and, whether they exit shelters for permanent subsidized housing or for unstable housing arrangements, their repeated use of shelter points to the need for new approaches and models to help previously homeless vulnerable families with children transition to permanent housing and retain their housing once placed.

1) The City, with the support of the philanthropic community, should encourage the piloting of an evidence-informed service-enriched housing model for vulnerable homeless families not qualifying for NYC 15/15 housing.

A service-enriched model should be designed with the goal of addressing the needs of families who are not eligible for NYC 15/15 housing, where the head of household and/or children require on-going support to maintain stability due to trauma, age of head of household,

number of children, lack of education and job experience, domestic violence, child welfare involvement, and/or lack of independent living experience.

A trauma-informed, service-enriched housing model for previously homeless families with children would contain a mix of homeless families and very low and low income tenants from the general population with homeless families comprising 50% to 60% of the tenants. Services should be offered on-site by a team consisting of a clinical social worker, one or more case managers depending on the size of the project, access to a children's therapist, and one or more children's activities specialists. The on-site team could refer tenants to off-site programs for mental health services, legal services, and job training and placement programs as appropriate. The size and composition of the on-site service team might vary over time depending upon the needs of the resident population.

Services should be voluntary, trauma-informed and client-driven. They should include benefits advocacy and case management; counseling services; safety planning; independent living skills (e.g., financial management and budgeting, health and nutrition, housekeeping and apartment maintenance); parenting support; employment readiness; educational and vocational counseling; educational and recreational activities for children; linkages to medical and mental health services; referrals to legal services, job training programs, and services for children. Service-enriched housing for families would provide services on site to help previously homeless families achieve the following goals: (1) housing stability, (2) family unity, (3) the educational, social, and physical well-being of children, and (4) improved economic security for the household.

The development of such a model should be led by the City and the philanthropic community in cooperation with nonprofit housing developers, and service providers.

2) HRA/DHS/HRA should fund aftercare services at existing shelters.

Approximately half of homeless families with children are housed in shelters, most of which are operated by not-for-profits under contract with HRA/DHS. Most families have received some services while in shelter and shelter operators have a sense of the specific barriers to housing stability that families face. In other words, relationships with families have been established. As a result, transitional shelters offer an opportunity to work with families to prepare them for permanent housing and to connect them to appropriate community-based services.

Some shelters are currently providing aftercare services – where case managers outreach to families once they are placed in permanent housing and provide post shelter support groups. These programs are privately funded.

Family Advocates at transitional shelters, with a caseload of no more than 20 families, could begin to prepare families for independent living while still in shelter. Specifically, they should:

- Assist families to obtain and understand their rental subsidies.
- Explain rent payment and the other rights and responsibilities of tenancy.
- Explain the rights of tenants under Rent Stabilization.

- Help families set up utility accounts.
- Assist families to establish budgets that stress the payment of “rent first”.
- Assist with safety planning when the head of household is a domestic violence survivor.
- Help register children in new school districts or arrange for bus transportation from existing districts.
- Help the head of household identify preschool/early education child care if needed.
- Assist the family to find primary health care.
- Provide information about amenities and services (grocery & drug stores, libraries).
- Introduce the family to available services nearby (e.g., HomeBase).

After the family leaves shelter and moves into permanent housing, the Family Advocate should maintain contact with the family through home visits and monthly check-in calls as needed. For families with higher barriers to housing stability, the Family Advocate should attempt to connect them with available local resources and services as well and continue outreach for a longer time.

Several organizations are currently operating successful aftercare programs, including Henry Street Settlement, Barrier Free Living, and Sanctuary for Families. The best practices of these programs should be incorporated into a HRA/DHS concept paper to be distributed to shelter operators and other stakeholders for comment. The aftercare concept paper would become the basis of a City-funded expansion program for the not-for-profit operated shelters.

3) HPD should facilitate the provision of voluntary services in HPD-funded projects housing 10% or more homeless families with children.

HPD currently requires homeless set-asides in its capital funding programs for its new construction and preservation programs. Developers who have participated in these programs express concern that the families housed require services that they are not able to provide. Families present with many issues that lead to housing instability but find themselves in housing with no on-site services or access to services. Landlords meanwhile lose rent (and rental subsidies) and must pay for legal costs.

As part of the revision of its term sheets, HPD has sought to address this issue by requiring that developers using Our Space funding to capitalize a “social service reserve” in projects with homeless set-asides.

To facilitate the matching of appropriate service providers to HPD-funded projects containing homeless units, HPD or HRA should issue a RFQ for nonprofit service providers interested in offering services to homeless families at permanent housing and create a list of qualified providers with their expertise and experience. HRA and HPD would work together to match qualified service providers with HPD-funded projects containing homeless set-asides. The service provider would determine the level and duration of services to be provided depending upon the presenting needs of the homeless families to be housed.

4) The City should enhance and publicize the existing 311 Helpline.

There are existing services in the community that are designed to help previously homeless families, as well as other community residents, find and retain their housing and avoid a return to homelessness. HomeBase is the most noteworthy example, but a network of organizations funded by HPD called “Housing Ambassadors” also exists throughout NYC to help individuals apply for affordable housing. Providers, however, express frustration, that residents have trouble finding them or approach them too late in the process when they are already in crisis and on the verge of eviction. Most NYC nonprofits who provide housing and social services receive calls and walk-ins from those who are looking for affordable housing or help keeping the housing they have. This points to a serious problem with the existing non-residential services network. Although help may exist, those who need it most have trouble finding it. The connective tissue that guides individuals to organizations that can help them is missing.

Echoing the recommendation addressed in the Prevention Section, an enhanced 311 Helpline might be able to fill the same need if adequately advertised. Alternatively, a centralized 24-hour Housing Help Hotline, like the City’s Domestic Violence Hotline, could provide this connective tissue by providing callers with critical information and driving traffic to appropriate HomeBase and other non-residential service providers. HPD and/or HRA could select a not-for-profit operator through a RFP process. Funding for the Hotline could come from HPD, HRA and the City Council.

In either case, frequent publicity campaigns on subways/ buses/ trains as well as widespread distribution of flyers to shelters, City Council offices, HRA Income Maintenance Centers, City Council and Community Board offices, prekindergarten and child care centers, libraries, housing courts, child welfare preventive service offices, food pantries, parks, playgrounds, and other public or community-based locations would help to spread the word broadly. The goal should be for people to know that they can call 311 for housing help in the same way they know they can call 911 in an emergency.

IV. Systemic Recommendations

As family homelessness is a complex issue with multifaceted underlying factors, the responsibility to create solutions should not fall on the shoulders of any one entity. It is the collective responsibility of a diverse group of stakeholders, including, but not limited to, the State, City, service providers, advocacy groups, housing developers, landlords, consumers and the philanthropic community. Furthermore, as discussed earlier, prevention, in-shelter and post-shelter services, and the needs of families in this continuum are linked.

Currently, the City has both a housing plan and a homelessness plan. Given the complexity and scale of this issue, and the need to collaborate across sectors and agencies (both at the State and City levels), the FHTF has identified two systemic cross-cutting issues: 1) the need for a more coordinated approach to housing and homelessness and 2) the need for more public data for policy-makers, advocates and providers.

- 1) The City should create an integrated housing and homelessness plan focused on homeless families with children and create a subcommittee of the interagency coordinating council that includes advocates, service providers and formerly homeless family members to monitor that plan and ensure that the needs of homeless children and their families are addressed.**

New York City has invested considerable resources and effort to address the problem of homelessness and to increase the production of affordable housing. However, housing and homelessness are overseen by different agencies that fall under different Deputy Mayors with different mandates that have not always been seamlessly coordinated. Reducing family homelessness cannot be achieved without increasing the supply of rental housing and resources available to the homeless. The City should create a plan that closely integrates the production of affordable housing with solutions to family homelessness, including services. To accomplish this task, a number of City agencies will need to work together. While there is currently an interagency task force established in law by the City Council, City Council Int. 1460-2017, would create an Advisory Council that would include advocates, providers and formerly homeless, which would strengthen the task force and provide a formal mechanism for government officials to collaborate with the providers, advocates and consumers.

Furthermore, the mandate of the existing interagency body is very broad, covering all City homelessness efforts. The needs of families with children who are homeless need to be addressed in a more targeted manner through a working group dedicated solely to this large subset of the homeless.

- 2) The City should track and make public data about homeless families with children as well as information about the allocation of housing and homeless housing resources to homeless families with children.**

Effectively addressing family homelessness and its underlying causes requires access to robust data that can help inform policy and program development and implementation. The current lack of data on families with children experiencing homelessness makes it difficult to identify the different needs of this large and diverse population.

The City should track and make public more data related to families with children, including, but not limited to:

- Demographic information (e.g. race/ethnicity; age of household members; gender; reason for entering shelter)
- Information on families who repeatedly return to shelter (e.g. demographics; how long before return; what assistance they received when they left shelter; what caused the return)
- Information on the allocation of housing resources to homeless families with children (e.g. rental subsidies; public housing units; supportive housing units; HPD-funded housing)
- Educational data (e.g. how many days before transportation arranged; absenteeism data; academic performance data)

- Early education data (e.g. number/percent of children under 5 enrolled in child care, Head Start, prekindergarten and early intervention programs)

V. Conclusion and Next Steps

The three co-conveners of the Family Homelessness Task Force—Citizens’ Committee for Children, Enterprise Community Partners, and New Destiny Housing— look forward to working with our colleagues both in government and outside government—to recognize and address the needs of homeless children and their families with the goal of reducing and eliminating family homelessness.

We intend to work with the members of the Task Force, as well as other stakeholders to respond to the needs of homeless children and their families, to advance and advocate for the recommendations in this report, and to secure the resources, laws and policy changes required to reduce family homelessness. Finally, we remain committed to focusing public attention on the needs of homeless children and their families.

Family Homelessness Task Force Members and Participants

(Please note that this document has not been vetted and endorsed by all Task Force members, this is an acknowledgement of each organization for their participation and contributions.)

Advocates for Children
Barrier Free Living
BronxWorks
BRP Management Group
CAMBA
Citizens' Committee for Children (co-convener)
Center for Court Innovation
Center Against Domestic Violence
Coalition for Behavioral Health
Coalition for the Homeless
Corporation for Supportive Housing
Community for Urban Community Services
Dunn Development
Enterprise Community Partners (co-convener)
Fordham Bedford Development Corporation
Gateway Housing
Good Shepherd Services
HELP USA
Henry Street Settlement
Homeless Services United
Lantern Group
Legal Aid Society
Monadnock
Nazareth Housing
New Destiny Housing (co-convener)
Ridgewood Bushwick Senior Citizens Council
Safe Horizon
Sanctuary for Families
Settlement Housing Fund
Supportive Housing Network of New York
United Neighborhood Housing
Urban Resource Institute
Women in Need

Philanthropic Advisory Committee

Capital One
Deutsche Bank
Goldman Sachs
JP Morgan Chase
Mizuho Bank
New York Community Trust
New York Women's Foundation
Robin Hood Foundation
Santander

Consumer Advisory Committee

The FHTF would like to thank those organizations that helped organize three Consumer Advisory Committees, which helped inform the development of the recommendations. Names are not listed here for privacy reasons.

TESTIMONY OF
BETH MORROW, Director, Health IT Initiatives, The Children's Partnership
to
The New York City Council on June 26, 2017

Proposed Int. No. 855-A (Kallos)

Since the passage of the Children's Health Insurance Program, I have been working as part of a team that developed and piloted the concept of Express Lane Eligibility (ELE) – a policy that streamlines eligibility, enrollment, and renewal processes for means-tested programs by allowing one program agency to rely on data and findings from another program agency. Express Lane Eligibility can be used to promote public health coverage as well as participation in other public programs.

Express Lane Eligibility was authorized for use in the Children's Health Insurance Program Reauthorization Act of 2009 (CHIPRA) and the Affordable Care Act. Studies of ELE pursuant to CHIPRA find the process primarily being used between SNAP and Medicaid/CHIP, but it has also enabled connection between Medicaid/CHIP and WIC, Free and Reduced Price School Lunch, and tax returns. I am unaware of a comprehensive study of the use of ELE under the ACA, though its use there has generally focused on developing horizontal integration between SNAP and health coverage. Findings from studies of the CHIPRA and California efforts point to the value of all forms of Express Lane Eligibility. I have attached the Executive Summary from two such studies.

The proposed process in New York City involves administrative simplification, without getting into the complications of borrowing another program's eligibility findings – the trickier legal piece of Express Lane Eligibility. Even in this more straightforward context, the basic lessons of ELE are still pertinent.

Lessons Learned in the 14 states that implemented ELE into Medicaid/CHIP:

- 1) Reach more eligible people in need – Through ELE, combined Medicaid/CHIP enrollment was increased by 4.2 % and Medicaid enrollment was increased on an average by 5.6%.¹ In fact, ELE has helped states reach hard-to-reach populations, helping them target and then support eligible non-applicants.²
- 2) Reduce administrative burdens – The most commonly reported benefit from ELE was that it reduced the administrative burden for both agencies and families.³
- 3) Improve retention – ELE has demonstrated the greatest impact and administrative savings when it is used for renewal. It is especially successful when it uses other program data to automate renewal.⁴ For instance, Louisiana is able to automatically renew over ¾ of clients using shared data.⁵
- 4) Administrative savings – Through ELE, states that have deployed automated processes have realized significant cost savings. For instance, Louisiana reports saving roughly \$1 million a year, and South Carolina reports saving \$1.6 million per year.⁶

Essential features to realize the full impact of administrative simplification measures to improve program participation:⁷

- 1) Automation is essential to ensure that the process is simpler for agencies as well as for clients. Up-front investment in automation can reap cost-savings later.
- 2) Pre-population of data should be leveraged, to the greatest degree possible, to increase the likelihood that applicants complete the application/renewal process. The less work required of a client, the more likely he or she will participate in a public program for which they are eligible.
- 3) The most successful efforts utilize “one step” processes that do not routinely require applicants to submit follow-up documents and information, or follow-up visits.

In this era of technology and cross-program data exchange, it is common sense for public agencies to use the data that they have to facilitate administrative processes. Such measures can benefit clients, as well as program administrators – making life easier for all parties.

While I would urge taking a step beyond administrative simplification, to utilize the full benefits of another program’s findings through ELE and reap the greatest benefit in terms of administrative savings,⁸ this NYC proposal is a good first step to improving access and simplifying the application, enrollment, and renewal experience.

For further information, contact Beth Morrow at bmorrow@childrenspartnership.org, or (718) 832-6061.

¹ Fredric Blavin, Genevieve M. Kenney, and Michael Huntress, “The Effects of Express Lane Eligibility on Medicaid and CHIP Enrollment among Children,” *Health Services Research*, 49:4 (August 2014) 1268-1289.

² Sheila Hoag, et. al., *CHIPRA Mandated Evaluation of Express Lane Eligibility: Final Findings* (Mathematica Policy Research, December 2013) 47.

³ Office of the Inspector General, *State Use of Express Lane Eligibility for Medicaid and CHIP Enrollment* (OEI-06-15-00410, October 2016) 8.

⁴ Hoag, *op.cit.*, xvi, xviii.

⁵ Stan Dorn, Sarah Minton, and Erika Huber, The Urban Institute, *Examples of Promising Practices for Integrating and Coordinating Eligibility, Enrollment and Retention: Human Services and Health Programs Under the Affordable Care Act* (Office of the Assistant Secretary for Planning and Evaluation, July 2014), Table 1.

⁶ *Ibid.*

⁷ Beth Morrow, *The Children’s Partnership, Express Lane Eligibility Efforts: Lessons Learned from Early State Cross-Program Enrollment Initiatives* (Kaiser Family Foundation, August 2009).

⁸ Hoag, *op. cit.*, xvii.

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**STATE USE OF EXPRESS LANE
ELIGIBILITY FOR MEDICAID
AND CHIP ENROLLMENT**



**Suzanne Murrin
Deputy Inspector General**

**October 2016
OEI-06-15-00410**

**EXECUTIVE SUMMARY: STATE USE OF EXPRESS LANE ELIGIBILITY FOR
MEDICAID AND CHIP ENROLLMENT
OEI-06-15-00410**

WHY WE DID THIS STUDY

Medicaid and the Children's Health Insurance Program (CHIP) provide health insurance coverage for certain low-income children, yet millions of eligible children are still uninsured. To increase enrollment of eligible children, Congress authorized States to adopt the Express Lane Eligibility (ELE) option, which allows States to expedite and simplify enrollment in Medicaid and CHIP by relying on findings from other agencies' eligibility determinations. Congress will determine whether to reauthorize the ELE option in 2017. We conducted this study in response to a Congressional request that the U.S. Department of Health and Human Services, Office of Inspector General (OIG) examine the benefits and barriers to State use and expansion of ELE. This report is being issued concurrently with two OIG audits that fulfill a Congressional mandate to assess whether State agencies met Federal requirements in making eligibility determinations using ELE and developing eligibility error rates.

HOW WE DID THIS STUDY

We administered questionnaires and conducted telephone interviews with Medicaid and CHIP officials from the 14 States that adopted ELE. Where available, we supplemented this information with enrollment and cost savings data collected from the States.

WHAT WE FOUND

States that used ELE adopted variations of three models, with more than half adopting an automated model that requires minimal action from staff and beneficiaries. All 14 States that used ELE reported benefits, including reduced administrative burden and cost savings, and some States reported that they rely heavily on ELE. Eleven States reported that they encountered barriers when they implemented ELE, such as problems sharing information across agencies, but reported that they overcame these barriers through strong partnerships and integrated eligibility systems. Despite largely positive experiences using ELE, 5 of the 14 States that adopted ELE discontinued its use, mainly because of competing priorities, system changes, and short-term agreements with partner agencies. None of the 9 States still using ELE plan to expand its use.

WHAT WE CONCLUDE

Although State use of ELE is not widespread, ELE appears to meet the intended objective of easing the eligibility and enrollment process. Implementation of ELE is consistent with the goals of the Patient Protection and Affordable Care Act provisions to streamline enrollment processes for Medicaid and CHIP. Based on this review of State experiences with ELE, OIG did not identify any significant impediments to continuing to allow voluntary use of ELE, once States and CMS have corrected process problems and gaps in oversight identified by OIG audits of ELE enrollments. Reauthorization of the ELE option would allow States that rely on ELE to continue its use and give other States the opportunity to adopt ELE and likely experience similar benefits.

Examples of Promising Practices for Integrating and Coordinating Eligibility, Enrollment and Retention: Human Services and Health Programs Under the Affordable Care Act

Prepared by:

Stan Dorn, Sarah Minton, and Erika Huber

The Urban Institute

Under Task Order: HHSP23337026T

Integrating Health and Human Services Programs and Reaching Eligible Individuals Under the Affordable Care Act

Prepared for:

Alana Landey

Office of the Assistant Secretary for Planning and Evaluation, DHHS

21 July 2014

Project 08800-026-00





Executive Summary

It is not easy to effectively integrate and coordinate the operation of multiple health and human services programs that serve overlapping populations, but such efforts can yield significant gains. When one program determines eligibility based on the work already done by another program, public agencies can save administrative costs and streamline enrollment and retention for consumers. When programs jointly develop and operate shared eligibility infrastructure, they can achieve gains together that no single program could accomplish alone. And when programs collaborate in reaching out to a shared client population, more consumers can receive benefits for which they qualify.

This work has grown increasingly important following the 2010 enactment of the Patient Protection and Affordable Care Act (Affordable Care Act or ACA). In three basic categories, states and private-sector organizations have achieved notable success.

1. *Streamlining eligibility for one program based on data linkages with another program.*

- Louisiana renews children's eligibility for Medicaid and the Children's Health Insurance Program (CHIP) through data from other public agencies, whenever possible. More than 3 in 4 of renewals (76 percent) are based on data matches, without any need to contact families for additional information. Nearly all children (95.4 percent) have eligibility continue at renewal, and fewer than 1 percent lose coverage for procedural reasons.
- Louisiana and South Carolina have implemented Express Lane Eligibility (ELE) to provide children with Medicaid based on the income determinations of human services programs—especially the Supplemental Nutrition Assistance Program (SNAP). This initiative has covered more than 27,000 and 92,000 previously uninsured children in the two states, respectively. Mainly because of the many children who are automatically renewed based on their receipt of SNAP, each of these states achieved annual net savings of roughly \$1 million and \$1.6 million, respectively. Similar efforts are now beginning with adults as well, through targeted Medicaid enrollment strategies under the ACA.
- In many states, Combined Application Project (CAP) demonstrations provide SNAP to recipients of Supplemental Security Income (SSI) based largely or entirely on information these seniors and people with disabilities already furnished when they sought SSI in a CAP demonstration state. From 2000 to 2008, CAP states experienced a 48% increase in SNAP participation levels among 1-person SSI households, at a time when such households' enrollment in other states saw little change. To simplify SNAP procedures, CAP demonstrations use standardized rather than individualized SNAP benefit amounts, or individually determined benefits reflecting standardized shelter costs, either of which can result in slightly different amounts of aid than if beneficiaries had gone through the full SNAP eligibility assessment process. However, although SNAP programs provide notice, few CAP participants know they can obtain an individualized eligibility determination, and perhaps additional benefits, by submitting a regular SNAP application.

2. *Coordinating administration of multiple programs.* Through efforts that spanned the better part of a decade, Utah built an integrated system of electronic case records, rules engine, external data matching, on-line applications, and benefit payment that serves multiple health

and human services programs. From 2008 to the system's full implementation in 2010, the caseload capable of being managed by a single worker increased 53 percent. From 2009-2010, caseloads rose by 12.3 percent as total operating costs fell by 9.6 percent.

3. *Coordinating outreach and enrollment.*

- In implementing early Medicaid expansion under the Affordable Care Act, Minnesota enrolled eligible consumers through the “low-tech” strategies of (a) making a toll-free number available to hospital emergency rooms and (b) having state and local staff manually convert consumers from a prior state health program to Medicaid. The latter step was cumbersome and administratively costly, but these methods helped the state enroll 51,583 eligible consumers by the end of March 2011, the expansion's first month. They represented 68% of all consumers who received coverage by the end of calendar year 2011.
- Single Stop USA, a non-profit organization, helps community college students and their families enroll into health and human services programs, while providing financial and legal counseling. At 17 sites in seven states, 18,000 students were counseled in 2012, of whom 29% received health and human services benefits averaging \$5,400 per student—roughly the maximum Pell Grant for a low-income college student. More than half also received financial or legal counseling. It took hard work to integrate this initiative into existing community college culture, but most school leaders have grown highly supportive, investing much of the funding needed for ongoing program operation.

On the other hand, several initially promising strategies have not yet achieved major gains. Another Single Stop effort involved connecting low-income consumers to health coverage when they filed tax returns at volunteer tax preparation sites. This effort faced serious challenges, including difficulty obtaining the necessary investment of time and staff from pre-ACA health application assisters, the unwillingness of many consumers to invest the additional time needed to apply for health coverage after completing the tax preparation process, and limitations of volunteer tax preparer health knowledge that forced a cumbersome “hand-off” from tax preparer to health application assister. The ACA strengthens the logical nexus between health coverage and tax preparation, which will provide increased motivation to overcome these challenges.

As another example, referring consumers to programs for which they apparently qualify, rather than actually signing them up for assistance, has achieved little success. One randomized, controlled experiment involved the tax preparation firm H&R Block. When the firm used tax return data and interviews to complete and file SNAP application forms on behalf of low-income customers, 80 percent more applications were filed than with a control group that received only basic SNAP information and a blank SNAP form. By contrast, no statistically significant effects were observed, compared to the control group, when H&R Block completed SNAP forms, handed them to families, and explained where and how to file them. A similar H&R Block experiment involving applications for college student aid reached similar results.

Efforts to integrate and coordinate enrollment, retention, and eligibility determination for health and human services programs typically require considerable effort, and not all such efforts have proven successful. That said, many states, localities, and private-sector groups have achieved significant positive outcomes using strategies that appear capable of replication elsewhere.



NYC Veterans Alliance

www.nycveteransalliance.org

www.ourveterans.nyc

Testimony by

Olivia Meier
Director of Operations and Development
NYC Veterans Alliance

Hearing: Committee on General Welfare
Council Member Stephen Levin, Chair

June 20, 2017

Good Afternoon, and thank you to Chairman Levin and committee members for the opportunity to testify today. My name is **Olivia Meier**, and I am here to offer testimony on Introduction 855-A on behalf of the **NYC Veterans Alliance**, a member-supported, grassroots policy advocacy and empowerment organization serving veterans, servicemembers, and their families across the New York City metropolitan area.

We applaud and support Council Member Kallos's bill to improve and streamline access to public assistance for our fellow New Yorkers in need. New York City is a leader in digital innovation in the private sector, and we must marshal the latest advances in technology not just for corporate profit, but for the social good of improving the lives of the most vulnerable among us. It should be as easy to find information and apply for services with city agencies as it is to apply for a job or place an order online to have sushi delivered. It shouldn't be an exhausting, confusing, frustrating process for a citizen in need to determine their eligibility for food or housing assistance, or to initiate their application. Our fellow New Yorkers who are in need or in crisis should have streamlined, compassionate access to the help they need—not a series of frustrating barriers that too often conceal or limit access to crucial resources for which they are eligible.

My organization has advocated for improved access to resources for veterans of the United States Armed Forces and currently serving members of reserve, National Guard, and state militia forces. Over the years there have been frustrating barriers to these individuals—estimated at some 220,000 across the five boroughs, plus an estimated 250,000 or more spouses and household dependents—being able to access the city, state, and federal benefits and services for which they or their families are eligible. Taken together, approximately 1 in 17 New Yorkers are eligible for city, state, and federal benefits and services provided for veterans and their families. Yet far too many veterans and family members—even those most in need—who do not identify as “veterans” because they served during peacetime or were never called to active status.

When those who have served in the military, and their families, do not self-identify as veterans and seek out the services and benefits for which they are eligible, this represents potentially millions of federal and state dollars that are not reaching families and communities here in New York City that need that money. While much work is being done to create an effective digital portal for accessing veterans' benefits and services through the NYC

Department of Veterans' Services VetConnectNYC program, this will only serve those who self-identify as veterans.

To ensure streamlined access to services for 1 in 17 New Yorkers who either served in the military or who is a spouse or dependent family member of someone who served, we strongly urge this committee to amend the current bill to include the specification that applicants requesting assistance from HRA be screened for prior service in the U.S. Armed Forces or State Guard or militia, and for whether their spouse or head of household has ever served in the U.S. Armed forces or State Guard or militia. This screening question is key to identifying individuals in need who do not otherwise self-identify as “veterans” because of their perception of their prior military service. Those who screen positive can be effectively referred to resources currently housed within NYC DVS.

On behalf of the NYC Veterans Alliance, I thank you for the opportunity to testify today. Pending your questions, this concludes my testimony.

FOR THE RECORD

FOR THE RECORD

BENJAMIN J. KALLOS
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December 31, 2015

Jeffrey Zients, Director, National Economic Council
Cecilia Muñoz, Director, Domestic Policy Council
The White House, 1600 Pennsylvania Avenue NW
Washington, DC 20500

Sylvia Mathews Burwell, Secretary
Department of Health & Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Directors Zients and Muñoz, and Secretary Burwell,

The health and welfare of the residents of our city, state and nation, depends not only on medical insurance coverage, but also on access to nutrition, home energy, cash assistance, and other human services necessary to stay healthy.

We are therefore writing to ask that Healthcare.gov, the current exchange provider for 36 states, be upgraded to offer residents the other federal and state services they qualify for at the same time as they are screened for Medicaid.

President Obama has already laid the groundwork for "automatic benefits" through the Affordable Care Act, Executive Order 13563, Executive Memorandum, waivers, and guidance. There is even funding through 2018 for each state to integrate, interoperate, and improve the delivery of federally assisted benefits to their residents by leveraging information sharing across human service agencies to automatically recertify or provide benefits.

Upgrading HealthCare.gov to screen people for additional benefit eligibility is possible using currently available, affordable and tested technology. States including California, Louisiana, North Carolina, Pennsylvania, and New York have begun to implement one stop websites for multi-benefit screening and application, online and mobile phone apps for self-service case management and updates, eligibility systems and business rule engines (BREs), electronic evidence imaging, and electronic data matching to provide benefits automatically. In France, they are using open-source expert systems, mes-aides.gouv.fr, to the same end.

Automatic benefits can make government more efficient, effective, and humane. By expanding Healthcare.gov to offer such benefits, President Obama will leverage his signature open government data initiative to leave a legacy of improved citizen services. Without White House leadership and coordination, though, most states will miss the 2018 deadline for implementation, leaving many Americans without the benefits they need.

Sincerely,

Ben Kallos
Ben Kallos

Cc: Shaun Donovan, Office of Management and Budget
Steve Banks, Commissioner, New York City Human Resources Administration



Good afternoon Chair Levin, Council Member Kallos, and Committee Members,

My name is Emily Marano and I am here representing Single Stop, an anti-poverty organization that connects New Yorkers with the full spectrum of benefits and resources available to them. The premise behind Single Stop's model is that accessed individually, a single public benefit cannot stabilize a household. Accessed in concert, however, multiple resources can address the underlying causes of poverty.

Single Stop enthusiastically supports all efforts by the city to further the goal of making the safety net more accessible. In order for New Yorkers to attain household stability and to benefit from the proven, long-term outcomes of safety net programs, people must first learn about the existence of programs, and navigate complex application processes.

This is why Single Stop has been at the forefront of working to make coordinated access to the social safety net simpler for the people who need it—from convening a national coalition that did work highlighting reforms to modernize application procedures for benefits, to creating a web-based app that allows clients to find programs they are eligible for, to acting as one of the lead partners on Robin Hood's *Start by Asking* Campaign.

Based on our experiences, we believe this proposed legislation is a big step toward the goal of increasing access to programs designed to provide help to low-income New Yorkers. It will be a big task for HRA to successfully implement this law so that families receive easy-to-understand and actionable information. Once done, however, it will be highly valuable to the families that will receive the resources they need to stabilize their lives.

The lessons of program integration have been that sustainable change requires collaboration and redesigned business processes that support the goal¹. Policy alignment must be a priority, and HRA and its partners must be intentional about implementation of the policy, refining their approach as they go. Single Stop offers HRA and the City Council our support, our partnership, and our knowledge from our more than ten years of experience with connecting clients to multiple benefits as you take on this challenge.

Thank you.

¹ James, Cemeré, *Work Support Strategies Initiative: 12 Lessons on Program Integration and Innovation*, Center for Law and Social Policy (CLASP), April 2016, http://www.clasp.org/resources-and-publications/publication-1/WSS_Lessons_4.1.16-.pdf.

Intuit was founded in 1983, committed to integrity, to our customers and to our employees. Intuit believes in the power of the individual. The power to do more. To make more. To be more. We believe in the people who do things – the hat jugglers, the to-do list junkies, the masters of getting it done faster, better and more efficiently than ever before. Whether that's balancing the household budget, running a business or paying taxes. In short: We simplify the business of life.

As the world evolves, so do we – inventing new solutions to solve important problems, perfecting those solutions and delighting our customers. In short: Improving people's financial lives so profoundly they can't imagine going back to the old way.

Benefit Assist was created as a software tool that was designed to help efficiently, accurately assist users in finding and applying for any type of government benefit within minutes. This tool was designed to be free of cost to users and government agencies.

Our research showed that the average user didn't apply for benefits for three main reasons 1. Didn't know they qualified for a benefit 2. Didn't know where to go apply and/or 3. The application was too confusing and difficult to complete (not knowing what information to input).

In 2015, we had over 1M U.S. tax payers use our Benefit Assist tool across all 50 states. Taxpayers and state agencies found that the Benefit Assist could not only help individuals fill out an application, but tools such as taking a picture of a paycheck to verify income and using tax data to verify income helped reduce 1,000's of hours of work many agencies had to do to assist their citizens in their qualification requirements. In the first year, we facilitated \$1.5B in user benefits and at no cost to taxpayers nor any government.

Through the roll out of our Benefit Assist tool, we realized that this tool is much better suited with government agencies and have open sourced the tool. To that end, The lead engineer and myself have given our own personal time to this open source project to assist companies and government entities to integrate with the tool and to continue to improve it.

Thank you again for your invitation and I am happy to answer any questions about the tool.



New York City

FOR THE RECORD

FOR THE RECORD

**Testimony of
Chris Widelo, AARP New York**

**New York City Council
Committee on General Welfare**

**Hearing on Intro 855-A
June 27, 2017**

**City Hall
New York, New York**

Contact: Chris Widelo (212) 407-3737 | cwidelo@arp.org

Good afternoon Chairman Levin and members of the Committee. My name is Chris Widelo and I am the Associate State Director for AARP in New York. On behalf of our 800,000 members age 50 and older in New York City, I want to thank you for the opportunity to testify on Intro 855-A.

Many older Americans do not participate in the low-income assistance programs for which they are eligible. In 2013 the Census Bureau reported that among older households with incomes below the poverty level, less than one-half (42 percent) received help from Medicaid, food stamps, or public housing.

Participation in these programs could be improved by increasing outreach efforts and coordinating eligibility criteria and application procedures among government programs.

Applicants may be required to provide the same eligibility information to several programs. They likely will have to apply separately for benefits, often in different locations. Also applicants who contact one government agency to apply for a benefit may not be told about other programs for which they might be eligible. Older people's access to Supplemental Nutrition Assistance Program (SNAP) benefits would be improved by making those who qualify for Medicaid automatically eligible for SNAP in the same way they are for SSI.

Although private foundations and community organizations have sought to expand participation in SSI, Medicaid, SNAP, and the Qualified Medicare Beneficiary program, private initiatives should not be a substitute for government outreach.

In addition to lack of knowledge about low-income assistance programs, administrative obstacles can create barriers to program participation. These obstacles include the length and complexity of public benefit application forms, discourteous treatment or cultural insensitivity by caseworkers, long waiting

periods, hard-to-reach locations, transportation problems, complicated appeals processes, and lack of materials and help in languages other than English. The public-benefit application process can be made simpler by improving the design and wording of the application forms. Forms tend to be long and complicated and lack helpful graphics. Also, forms frequently use colored paper, small type, and a mix of type styles, which make the materials difficult to read.

AARP supports Intro 855-A as it would require the Human Resources Administration to (HRA) to determine if public assistance recipients may qualify for other forms of public assistance and then notify those individuals as to the programs they qualify for. Additionally this bill would help break down some of the barriers I outlined by providing instructions on how to apply for that assistance and require HRA to pre-fill the application with any information they already have from the recipient's original application.

AARP supports this legislation as it will facilitate access to essential assistance programs for older New Yorkers. I urge the Council to pass Int. 855-A. Thank you for the opportunity to testify today.

Brenda Riley

Safety Net Activists

Urban Justice Center

40 Rector St. 9th. fl.

New York, N.Y.

Int.1461/1577

Testimony

Int.1461 and 1577

My name is Brenda Riley and I'm here representing my hard working colleagues Safety Net Activists at the Urban Justice Center (our parent organization) the 63,000 voiceless families that are homeless and or people thousands receiving grants from HRA. I'm here to speak on the introduction proposals 1461 and 1577 seeking passage by City Council Members into Council budget to request Human Rights Administration Dept. of Social Services to provide Customer Service refreshment training twice a year to all staff that interact with the public.

Training of staff will greatly enhance professional services rendered. Staff familiar with regulations will be more likely to respond to clients in a less stressed manner, causing clients feeling less stressed.

To enact such a bill will enhance a much needed professional environment, thus causing an immediate less confrontational working space by clients and staff. Thus giving way to developing recommendations on how electronic case mgt. systems can cause upgrading information and accountability in sharing information inter office as well as other fact finding applications by Office of Case Management. And last but not least increasing digital tools can assist state required information be more assessable to generate a better way to share and facilitate information sharing. Causing cost effective management to deal with information at a finger -tip.

City Council General Welfare Committee Hearing on June 27, 2017

Wendy O'Shields City Council Testimony

My name is Wendy O'Shields I am testifying as a New York City Homeless Rights Advocate and a member of the Urban Justice Safety Net Activists.

Int 0855-2015

Ben Kallos

Notification of public assistance eligibility.

I support Intro Bill 0855 requiring HRA workers at the Job Centers to inform eligible applicants and recipients about other important benefits. Many times the HRA Job Center worker neglects or withholds this critical information, which leaves the human being in a worse emergency. Often times if an emergency can be resolved and hunger or homelessness can possibly be averted.

Int 1597-2017

Stephen T. Levin

Requiring the that the Department of Homeless Services recognize time spent in foster care as Homelessness for the purpose of meeting rental voucher eligibility requirements.

I support Intro Bill 1597 the City of New York Department of Homeless Services shelters are home to the majority of 21 year olds who have aged out of Foster Care. These young adults find themselves in DHS or DHS Non-Profit shelters for young adults or DHS shelters for an older population. The reports from the young adult shelters are they are not safe, much fighting, bullying, and sex trafficking! On the other hand, the 21 to 23 year olds amongst 30 to 70 year olds offers different problems. Please have a plan for aged out of Foster Care to exit to a dormitory to College, their own studio or 1 bedroom with community supportive services, or another plan which they have chosen. Too often these young people are released to the world ^{and} they have had very little practical pay the bills life experiences.

Int 1642-2017

Stephen T. Levin

Rental Assistance Vouchers

I support Intro Bill 1642 many City of New York Department of Homeless Services residents have been for generations or in their adult life low income. Creating permanent vouchers for the income eligible will assist rent burdened New Yorkers. In addition, DHS should create a family profile per DHS shelter resident, which includes all family members. Many times Single Adults, Adult Families, and Families with Children have other family members who will join them once they are housed. Because DHS does not currently capture the entire household once housed many times overcrowding and inadequacy issues begin.

Reasons to Fire NYC's Mayor & His Team Instead of Buying Their BS:

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Brief discussion of viewpoint discrimination

Viewpoint discrimination is being discriminated against strictly because someone doesn’t agree with your views about something.

Although the U.S. Supreme Court confirmed that viewpoint discrimination is illegal by the following remarks it issued in the case of Wood v. Moss, 134 S. Ct. 2056, 572 U.S., 188 L. Ed. 2d 1039 (2014), the NYPD and members of the New York City Mayor’s staff subjected me to

viewpoint discrimination at public meetings on 4/27/17, 5/23/17, and 6/8/17 that the Mayor's office has arranged. In doing so, New York State's Open Meetings Law has been violated as well.

"As the Supreme Court recently held: "It is uncontested and uncontestable that government officials may not exclude from public places persons engaged in peaceful expressive activity solely because the government actor fears, dislikes, or disagrees with the views those persons express. It is equally plain that the fundamental right to speak secured by the First Amendment does not leave people at liberty to publicize their views whenever and however and wherever they please." *Wood v. Moss*, U.S. , 134 S.Ct. 2056, 2066, 188 L.Ed.2d 1039 (2014) (internal citations omitted) (addressing qualified immunity in the context of protesters' First Amendment claims alleging Secret Service agents engaged in viewpoint discrimination when they moved protesters away from the location of the President while allowing supporters to remain in their original location)."

What you should know about me:

1. U.S. Navy veteran honorably discharged and who was assigned to the same naval base in Japan where 7 servicemembers recently died due to a ship collision and was exonerated by NCIS of being a spy without getting a confiscated hard drive back from it:

CBS/AP June 18, 2017, 8:00 PM

U.S. Navy identifies 7 sailors who died in destroyer collision

44 Comments Share Tweet Stumble Email

Last Updated Jun 18, 2017 8:32 PM EDT

YOKOSUKA, Japan -- The search for seven U.S. Navy sailors missing after their destroyer collided with a container ship off Japan was called off Sunday after they were found dead in the ship's flooded compartments, CBS News national security correspondent David Martin reports.

28APR05-FEYK-0138-3XNA

SUBJ: S/ USN

U.S. NAVAL CRIMINAL INVESTIGATIVE SERVICE

(b)(6), (b)(7)(C) Special Agent, NCISRA Yokosuka, Japan
Advisory Special Agent, NCISRA Yokosuka, Japan
Advisory Special Agent, NCISRA Yokosuka, Japan
Intelligence Operations Specialist, NCISRA Yokosuka, Japan

Japan

ACTION

R.000J: Request authority for oral and wire intercept activity as set forth above. Expeditious handling is requested.

R.FEYK(CIO): Conduct a computer forensic review of the hard drive and PDA maintained under FEYK log number 037-05. Determine if any classified information is present and any references to (b)(6), (b)(7)(C) and her connection to North Korea, North Korean residents in Japan or her ability to introduce S/ to North Korean contacts.

2. My mother's legal guardian after strokes stole her of her speech and use of the right side of her body.
3. 7/2/16 assault victim of Ronald Sullivan due to HRA's negligence and Urban Pathways, Inc. bait-and-switch fraud and forgery that was reported to HRA on 3/16/16 after an apartment lease was signed in HRA's offices on 2/16/16 with Urban Pathways, Inc. The 7/2/16 assault produced a concussion that was diagnosed on 7/30/16 with lasting symptoms. Due to the bait-and-switch, instead of being issued a private and fully-furnished apartment by Urban that I signed the lease for, it illegally issued a 2nd lease to me on 3/6/16 that was invalid and contained a forged copy of my signature. This caused me to have Mr. Sullivan as my roommate and someone who tried assaulting me on 5/12/16 that I reported to one of HRA's partners named Services for the Underserved on that date.
4. 2/22/16 victim of theft while staying at HRA's Bellevue homeless shelter due to HRA's negligent failure to comply with New York State law requiring it to have adequate security there. A lack of door locks in that shelter let someone steal my iPhone in the middle of the night. After I told HRA's Commissioner face-to-face on 3/1/16 at NYC's Yale Club there was inadequate security in that shelter, continuing inadequate security there enabled someone to have his throat slit less than 2 months later.
5. 10/22/15 victim of flagrant judicial misconduct by Queens Housing Judge Clifton Nembhard that caused me to be illegally evicted from my apartment, after he and 2 court officers conducted a fraudulent inspection on 7/10/15 in my apartment, then prevented me from being able to present pertinent audio and video recordings as evidence confirming my landlord wasn't making repairs.
6. Winner of two lawsuits against a Queens slumlord named Robert Miller and/or his

companies a) 65-60 Realty Company LLC and b) Miller and Miller at the Queens Housing Court and Queens Supreme Court without having a lawyer. Most recent win was on 3/23/17 in a \$20 Million defamation suit after nearly 3 years and 5 judges in that case in which Mr. Miller lied while testifying. Yesterday, I mailed legal documents to a 66 year old woman named Brenda Kaminsky that same slumlord is trying to evict from her \$850/month apartment in my former apartment building at 65-60 Booth Street in Rego Park to try to help her defense and to help her try to get a lawyer. The slumlord's lawyer gave me a sworn affidavit from April of 2014 that essentially served to acknowledge that the slumlord and his building manager knew about a defective elevator in my former apartment building in Rego Park at that address for more than 1.5 years and neglected its maintenance as residents complained about it to the New York City Department of Buildings since at least 2007. As a result, that elevator repeatedly malfunctioned and was frequently out-of-service in violation of applicable law.

7. 2012 victim of wage-theft, fraud, and retaliation by NTT Data, Inc. and Credit Suisse, after Credit Suisse illegally coerced me to work 50 hours per week on average and NTT refused to pay for more than 40 hours per week in violation of applicable law. When I complained, NTT retaliated by terminated my job at Credit Suisse and blacklisting me. Credit Suisse coordinated that termination and refused to pay the amounts I was owed that NTT refused to pay. It appears that Credit Suisse also blacklisted me. Both HRA and the New York Attorney General's office have business with NTT.
8. Someone who is out of work partly because the Mayor's agencies won't grant me job interviews for jobs I've held and am fully qualified for.

Mayor's BS remarks about hiring military veterans on Veterans' Day 2016:

Source:

<http://www1.nyc.gov/office-of-the-mayor/news/880-16/transcript-mayor-de-blasio-delivers-remarks-the-opening-ceremony-the-2016-america-s-parade#/0>

1. "Anyone who has a job that they're looking to fill, fill it with a veteran. Do something for your country."
2. "Anyone who has a job that they're looking to fill, fill it with a veteran. Do something for your country."

Refusal by Mayor's team to grant me job interviews for suitable jobs:

Applications					
Job Title	Job ID	Location	Agency	Status	Recruitment
Desktop Support Manager	230990	33 Beaver St, New York Ny	DEPT. OF HOMELESS SERVICES	Applied	Not Hired
HEADQUARTERS DESKTOP SUPPORT	234749	9 Metrotech Center, Brooklyn N	FIRE DEPARTMENT	Applied	Not Hired
FIELD DESKTOP SUPPORT	234753	9 Metrotech Center, Brooklyn N	FIRE DEPARTMENT	Applied	Not Hired
Service Desk Agent-I	231876	150 William Street, New York N	ADMIN FOR CHILDREN'S SVCS	Applied	Not Hired
Field/Desktop Technician	239456	137 Centre St., N.Y.	DEPARTMENT OF SANITATION	Applied	Not Hired
Computer Associate (Technical Support) III	218543	96-05 Horace Harding Expway	DEPT OF ENVIRONMENT PROTECTION	Applied	Not Hired
Helpdesk Technician	272660	253 Broadway New York Ny	MAYORS OFFICE OF CONTRACT SVCS	Applied	Not Hired
Desktop Support Engineer	273600	80 Maiden Lane	DEPARTMENT OF INVESTIGATION	Applied	Not Hired
COMPUTER SERVICE TECHNICIAN	273883	15 Metrotech	HRA/DEPT OF SOCIAL SERVICES	Applied	Not Hired
Computer Associate (Technical Support)	257900	59-17 Junction Blvd Corona Ny	DEPT OF ENVIRONMENT PROTECTION	Applied	Not Hired

Some of the Business Mayor's agencies have with NTT Data, Inc. through your taxes:

Source:

<http://www1.nyc.gov/nyctp/fmsTxnSearch.htm?orgId=1219&source=FM&orgName=NTT+DATA%2C+INC>

Displaying Results 1-20 of 31 for: NTT DATA, INC.

<u>Contract Number</u>	<u>Start Date</u>	<u>End Date</u>	<u>Current Amount</u>	<u>% Change Amount</u>	<u>PIN</u>	<u>NYC Agency</u>
<u>CT 057 20145400226</u>	07/31/2013	07/31/2016	\$668,128.00	21 %	01713LASD2	CITYWIDE ADMIN SVCS (DCAS)
<u>CT 040 20143011331</u>	06/18/2014	06/30/2014	\$8,910.00	-64 %	61	EDUCATION
<u>CT 040 20149480037</u>	07/01/2013	06/30/2014	\$548,220.00	0 %	1C583	EDUCATION
<u>CT 040 20149480038</u>	07/01/2013	06/30/2014	\$14,000,000.00	4 %	1C583	EDUCATION
<u>CT 040 20149480061</u>	07/01/2013	06/30/2014	\$560,560.00	0 %	1C583	EDUCATION
<u>CT 040 20149480062</u>	07/01/2013	06/30/2014	\$343,009.00	0 %	1C583	EDUCATION
<u>CT 040 20133048245</u>	05/14/2013	06/30/2013	\$24,999.00	0 %	61	EDUCATION
<u>CT 827 20121416547</u>	12/01/2011	01/16/2015	\$19,218,061.00	-58 %	82708IT00067	SANITATION (DSNY)
<u>CT 096 20151402592</u>	05/01/2014	04/30/2017	\$1,138,740.00	0 %	096-14GPCM120601	HUMAN RESOURCES (HRA)
<u>CT 040 20153036768</u>	10/26/2015	06/30/2016	\$24,125.00	-3 %	49	EDUCATION
<u>CT 127 20106200764</u>	06/01/2010	05/31/2013	\$2,378,164.00	4 %	12710CA00073	FINANCIAL INFORMATION SERVICES (FISA)
<u>CT 069 20141413445</u>	12/01/2013	11/30/2016	\$1,800,441.00	0 %	09614G0012001	HUMAN RESOURCES (HRA)
<u>CT 040 20159580196</u>	07/01/2014	06/30/2016	\$2,973,375.00	36 %	1C583	EDUCATION
<u>CT 040 20159580226</u>	07/01/2014	06/30/2015	\$700,700.00	0 %	1C583	EDUCATION

Proof NTT Data, Inc. stole my pay & blacklisted me:

From:
Sent: Monday, April 23, 2012 9:56 AM
To: 'Keith Backer'
Subject: Re: Question about Credit Suisse's work schedules for contingent workers

Keith,

Can you find out from your firm's contacts at Credit Suisse why the firm in New York has a policy that requires contingent workers to be assigned work schedules that are consistently for an hour longer than colleagues that are permanent employees and working on the same teams?

Since this was never the case when I worked at Credit Suisse in Japan nor at any other firms in the U.S. and Japan, I would like clarification about this.

<p>blog.executivebiz.com</p> <p>NTT Data to Help Update DOJ's Immigration Review IT Support System; Tim Conway Comments</p>  <p>Tim Conway</p>	<p>blog.executivebiz.com</p> <p>DHS Taps NTT DATA for Biometric System Testing, Quality Assurance Services; Tim Conway Comments</p>  <p>Tim Conway</p>	<p>govconwire.com</p> <p>NTT Data Secures \$85M CBP Verification & Validation Services Recompete; Tim Conway Comments</p>  <p>NTT Data (NYSE: NTT) has landed a five-year, \$85 million contract to continue to provide independent verification and validation services to the Customs and Border Protection's office of acquisition.</p>	
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From: Sharin Newman
Sent: Tuesday, April 10, 2012 3:50 PM
To: Ed Epstein
Cc: Keith Backer; Meghan Duffy; Rebecca Freund
Subject: RE: Point of contact for issues that need to be escalated at Misi

His is on a pro-day, which is 10 hours max. I have reached out to his manager to head him off at the pass. The manager loves him and Towaki has not bashed us in any way. We have had face to face discussions, he tends to back off. Only in email is he a "tough guy". This has been obviously on-going, but should end at this point because he is getting paid on time now.

Sharin R. Newman
 Account Manager
 212.588.5497
 917.603.6139

From: Ed Epstein
Sent: Tuesday, April 10, 2012 3:46 PM
To: Sharin Newman
Cc: Keith Backer; Meghan Duffy; Rebecca Freund
Subject: FW: Point of contact for issues that need to be escalated at Misi

Hi Sharin,

Couple things:

- What is his pay situation? If he is paid hourly then he should be compensated for every hour worked. If he paid on a daily rate, then I'm assuming he is expected to support a professional work day.
- Please discuss with the client about this consultant because he might be trashing us at the site. And, I think you should have some face-2-face conversation with him and cool him down or we will need to terminate him.

Everyone in the back office knows this guy in a very bad way. I would suggest you get him out on our terms.

Edward Epstein | Regional Senior Vice President, Strategic Staffing | NTT DATA, Inc. | w. 610 257 3036 | m. 215 913 6664 | ed.epstein@nttdata.com | nttdata.com/americas

From: Ed Epstein
Sent: Tuesday, April 10, 2012 3:52 PM
To: Sharin Newman
Subject: RE: Point of contact for issues that need to be escalated at Misi

Your last sentence is not true. I have had 5 emails with him today. He looks for issues at every step. See what I just sent. And, he wants penalties in our agreement.

Edward Epstein | Regional Senior Vice President, Strategic Staffing | NTT DATA, Inc. | w. 610 257 3036 | m. 215 913 6664 | ed.epstein@nttdata.com | nttdata.com/americas

From: Ed Epstein
Sent: Tuesday, April 10, 2012 4:03 PM
To: Sharin Newman; Keith Backer
Cc: Meghan Duffy; Rebecca Freund
Subject: FW: Example of a lack of response from your firm

It is my strong recommendation that you plan for his exit. Inform the client, start looking for a backfill and get him out of our account.

Unless I heard wrong, all the issues seem to be his fault.

From: Sharin Newman
Sent: Tuesday, April 10, 2012 4:41 PM
To: Ed Epstein
Subject: RE: Example of a lack of response from your firm

Explain to me:

I would suggest you guys discuss how we work together and how we communicate. Me, Keith and ?

1st though, I would suggest we part ways and see how he reacts. Do this first? Right now? How should I lay it up?

I know he an awful consultant, but please keep in mind the client really likes him. What about the repercussions from that side if I just cut him loose? It is very hard to hire right now at CS, a backfill is probably a non-issue.

Sharin Newman
Account Manager
212.588.5497
917.603.6139

From: Ed Epstein
Sent: Wednesday, April 25, 2012 12:53 PM
To: Sharin Newman; Keith Backer; Meghan Duffy
Subject: FW: Harassment & unprofessionalism by Sharin Newman

I would like him removed from the account. If the client is insisting on keeping him there; then please find a company to pass him through. For that they (pass through company) can pay us a referral. I want us disassociated with him. I would like us to identify a backfill!

Please get this start and begin with a conversation with the client.

I'll be looking for an update by Friday.

From: @rmscorp.com
Subject: RE: credit suisse
Date: December 20, 2013 at 11:08 AM

They are an 8 hour professional daily rate. That is something your recruitment firm should have discussed with you prior to interviewing.

Credit Suisse- no OT just daily professional 8 hour day

Sent: Friday, December 20, 2013 10:27 AM

To:

Subject: Re: credit suisse

No. I was on this same team and not paid for all of the hours I worked there. I averaged 50 hour weeks, but got paid for 40.

On Dec 20, 2013, at 10:23 AM,

@rmscorp.com> wrote:

Hi

This is at Credit Suisse:

Consulting same rate \$70 hr w2

Top Tier investment bank is seeking a Production Support specialist to guarantee the support, management, integrity and quality of the Fixed Income Trade Floor Desktop infrastructure . The team provides support to the Fixed Income and Derivatives businesses and their support teams. The role will be working within an experienced team of Trade Floor Support Analysts with shared responsibility for the following:

- Provide 2nd level technical support for detected system and user problems.
- Troubleshooting and resolution in the Windows 7 desktop environment.
- ad-hoc troubleshooting and support for user queries;
- extensive intra-bank liaison, especially within the business groups;
- manage vendor contacts and relationships;
- managing small projects on a day to day basis;
- Adherence to strict SLA and KPIs.

Mayor & New York Attorney General's BS remarks about defending tenants from slumlords:



Bill de Blasio ✓
@NYCMayor

Follow ✓

We joined with @AGSchneiderman to do everything in our power to fight for tenants – and we're keeping that promise.

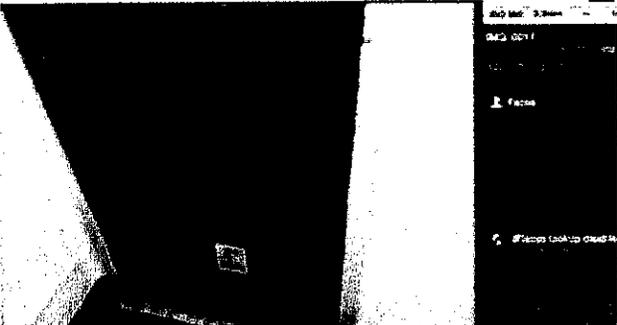


Attorney General Schneiderman Announces Guilty Verdict F...
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Retweets 10 Likes 26

7:08 PM - 20 Jun 2017

Refusal by New York Attorney General's office to help veteran fight off BS lawsuits by Queens slumlord and investigate alleged nonprofit & New York City Human Resources Administration's (HRA) partner Urban Pathways, Inc. for fraud:

<div style="text-align: center;">  <p>STATE OF NEW YORK OFFICE OF THE ATTORNEY GENERAL</p> </div> <p>ERIC T. SCHNEIDERMAN ATTORNEY GENERAL</p> <p style="text-align: right;">DIVISION OF ECONOMIC JUSTICE CONSUMER FRAUD & PROTECTION BUREAU</p> <p style="text-align: right;">August 20, 2014</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>65-60 Booth Street Apt. Rego Park, NY 11374</p> <p>Our File Number: 2014-1184249 Company: Robert Miller / 65-60 Realty Company LLC</p> </div> <p>Dear</p> <p>We have carefully reviewed your complaint. Unfortunately, your problem is not one for which our office can offer assistance.</p> <p>If you have not done so already, you may wish to consult a private attorney. If you need a referral, I suggest you call your local county bar association. The number for all New York State is (800) 342-3661.</p> <p>Thank you for writing to us.</p> <p style="text-align: right;">Very truly yours, <i>Crystal Lewis/so</i> Crystal Lewis Bureau of Consumer Frauds And Protection</p> 	<p>CIVIL COURT OF THE CITY OF NEW YORK COUNTY OF QUEENS- HOUSING PART C</p> <hr/> <p style="text-align: right;">Index No.: 6273/2013</p> <p style="text-align: center;">Petitioner,</p> <p style="text-align: center;">-against-</p> <p style="text-align: center;">65-60 REALTY COMPANY, LLC</p> <p style="text-align: center;">Respondent.</p> <hr/> <p>State of New York))ss: County of Westchester)</p> <p>5. As a result of breakdowns and complaints from tenants over a year and a half, I have decided to fully modernize the elevator. It is well past its "useful life", and is original to the building. This is something that is long overdue and is a benefit for all concerned.</p> <div style="text-align: right; margin-top: 20px;">  ROBERT MILLER </div> <div style="margin-top: 20px;"> <p style="border: 1px solid black; padding: 2px;">Sworn to before me this 10th day of April 2014</p> <p><i>Paul Francis</i></p> <p style="text-align: right; font-size: small;">PAUL FRANCIS Notary Public, State of New York No. 0140001672 Qualified in Putnam County Commission Expires November 13, 2017</p> </div> <p>that reside therein as the old elevator was becoming undependable with periodic breakdowns. We have made the decision to upgrade the entire system rather than continuing to make piecemeal repairs, which were becoming ineffective and costly. The elevator is original to the building and is past its "useful life."</p> <div style="text-align: right; margin-top: 20px;">  BEN PRESTON </div> <div style="margin-top: 20px;"> <p style="border: 1px solid black; padding: 2px;">Sworn to before me this 10th day of April 2014</p> <p><i>Paul Francis</i></p> <p style="text-align: right; font-size: small;">PAUL FRANCIS Notary Public, State of New York No. 0140001672 Qualified in Putnam County Commission Expires November 13, 2017</p> </div>
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STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

ERIC T. SCHNEIDERMAN
ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE
CHARITIES BUREAU

212-416-8410

November 3, 2016

Towaki Komatsu
One Penn Plaza, Ste. 6321
New York, NY 10119

Re: Urban Pathways Inc.
Registration No. 03-50-81
Our File No. 16CHN0652

Dear Mr. Komatsu:

The New York State Attorney General's Charities Bureau has received your recent complaint concerning the above named not-for-profit organization.

It appears that you have contacted the appropriate authorities concerning the issues you have raised. While we will not be taking action concerning your complaint, we will keep the information you have provided to us on file for future reference.

Thank you for contacting us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Lourdes Soto".

Lourdes Soto
Legal Assistant
Charities Bureau

Complaints made to HRA on 3/16/16 and 4/1/16 about fraud by Urban Pathways, Inc.

concerning a bait-and-switch and forgery regarding an apartment lease agreement:

• **From HRA's Own Records:**

3/16/2016	CA Application Interview	Mensah,R	He also provided a lease stating in apartment by himself but when he moved he found out there was someone else sharing the apartment with him. and the first lease he signed was change by landlord.
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• **From 4/1/16 e-mail I sent to HRA's Barbara Beirne:**

Subject: Fraud by HRA's business partner, Urban Pathways, Inc.

Date: April 1, 2016 at 4:53:02 PM EDT

To: beirneb@hra.nyc.gov

Cc: banks@hra.nyc.gov

Dear Ms. Beirne,

Good afternoon and thank you for the time you shared with me during our phone call today.

As discussed, the following is a copy of the lease agreement that I signed with Lisa Lombardi of Urban Pathways on February 16, 2016 at the offices of DHS located at 33 Beaver Street in Manhattan in a small conference room where there were roughly 5 people who witnessed that signing by Ms. Lombardi and I:

PDF

Urban Pathways -
Original Lease.pdf
1.3 MB

The following file attachment is a copy of the illegally modified lease agreement I received from Urban Pathways on or about March 7, 2016:

PDF

Urban Pathways -
Illegally Re...Lease.pdf
2.2 MB

The following is a list of how those 2 lease are different:

a) I signed the lease that was presented to me by Ms. Lombardi on February 16, 2016. I never signed the subsequently modified lease that illegally contains a photocopy of my signature from where I signed the original lease agreement. By having included that photocopy of my signature in the illegally modified lease, Urban Pathways committed the crime of forgery in the second degree pursuant to New York law.

b) The terms of the lease I signed clearly indicated that I would be residing in apartment 4C and that information was handwritten. The terms of the subsequent lease indicates that I would reside in Room 1 of Apartment 4B in that same building, which is a very small room. The information in the subsequent lease was typed.

Information about the \$1.8 Million HRA Gave Urban Pathways, Inc. for my apartment

building and excerpts for my 2 lease agreements in it:

FAIRMOUNT FACILITY FOR VETERANS - Negotiated Acquisition
- Other - PIN# 16NHEOC02001 - Due 1-28-16 at 2:00 P.M.

For Informational Purposes Only

HRA intends to enter into a Negotiated Acquisition with the following vendor;

Urban Pathways, Inc. Located at 802 Fairmount Place, Bronx NY
E-Pin#: 09616N0004 Contract Amount: \$1,851,220.00 Contract Term:
10 Years

The need for safe shelter for veterans is immediate, as there is a homelessness crisis with veterans as a particularly vulnerable group. Urban Pathways, Inc. can provide case management and building management services, and has identified 802 Fairmount Place as a building that is appropriate and available to permanently house 24 formerly homeless veterans in 1 and 2 bedroom units using subsidies such as LINC and VASH. Urban Pathways, Inc. would enter into a master lease with the property owner, and manage all aspects of this permanent housing facility.

Use the following address unless otherwise specified in notice, to secure, examine or submit bid/proposal documents, vendor pre-qualification and other forms; specifications/blueprints; other information; and for opening and reading of bids at date and time specified above.

Human Resources Administration, 150 Greenwich Street, 37th Floor, New York, NY 10007. Barbara Beirne (929) 221-6348; beirneb@hra.nyc.gov

Excerpt from actual lease I signed at HRA on 2/16/16 with Lisa Lombardi of Urban

Pathways, Inc.:

This Rental Agreement ("Lease" or "Agreement"), dated 2/16, and is between Urban Pathways Inc. (the "LESSOR"), and TOWAKI KOMATSU (the "TENANT(S)").

WHEREAS, Urban Pathways hereby leases to TENANT, a fully-furnished **1BR/2BR** Apartment AC on the 4 floor of the Building known as **798-802 Fairmount Place, Bronx, New York 10466**, in the Borough of **Bronx** and State of **New York** (the "Premises"), for the term of **12 Months**, unless sooner terminated as hereinafter provided, to be used and occupied as a strictly private residential dwelling by TENANT at the **12-month** rental rate of **\$14,400/\$19,200**, which represents equal monthly payments of **\$1,200/\$1,600** each, in advance, to be paid as specified in this Agreement.

Excerpt from fraudulent lease I never signed with Urban Pathways, Inc. and in which it forged my signature and substantially changed the terms from the actual lease I signed:

This Rental Agreement ("Lease" or "Agreement") is dated 2/16, and is between Urban Pathways Inc. (the "LESSOR"), and Towaki Komatsu (the "TENANT(S)").

WHEREAS, Urban Pathways hereby leases to TENANT, a fully-furnished **1BR/2BR** Apartment 4b rm 1 on the 4th floor of the Building known as **798-802 Fairmount Place, Bronx, New York 10460**, in the Borough of **Bronx** and State of **New York** (the "Premises"), for the term of **12 Months**, unless sooner terminated as hereinafter provided, to be used and occupied as a strictly private residential dwelling by TENANT at the **12-month** rental rate of **\$9,600**, which represents equal monthly payments of **\$800** each, in advance, to be paid as specified in this Agreement.

Concussion diagnosis on 7/30/16 due to Urban Pathways' fraud & HRA's negligence

following 7/2/16 assault and attempted 5/12/16 assault by roommate:

Mount Sinai Beth Israel

Department of Emergency Medicine

First Avenue at 16th Street

New York, NY 10003

212-844-1644

Medical Records

Take-Home Instructions for the Patient

Patient's Name: Komatsu, Towaki

DOS: 07/02/2016 19:51

Medical Record Number: 300001782686

E.D. Attending Physician: MD Nicole Nembhard

E.D. Resident or Physician Assistant: PA-C Dafna Gershoony

E.D. Primary Nurse : Adora Chatman, RN

Primary Care Provider: Physician - Non-BI

Primary Diagnosis: Abrasion of left forearm

Additional Diagnoses: Head injury

HRA's requirement to ensure low-income people have access to legal

assistance and/or representation:

New York City Charter

§ 13-b. Office of civil justice. a. The mayor shall establish an office of civil justice. Such office may, but need not, be established in the executive office of the mayor and may be established as a separate office, within any other office of the mayor or within any department, the head of which is appointed by the mayor. Such office shall be headed by a coordinator who shall be appointed by the mayor or the head of such department. For the purposes of this section only, "coordinator" shall mean the coordinator of the office of civil justice.

4. study the effectiveness of, and make recommendations with respect to, the expansion of (i) free and low-cost civil legal services programs, (ii) mediation and alternative dispute resolution programs and (iii) mechanisms for providing free and low-cost civil legal services during and after emergencies; provided that the coordinator shall, to the extent practicable, prioritize the study of, and making of recommendations with respect to, the expansion of free and low-cost civil legal services programs intended to address housing-related civil legal service needs of low-income city residents;

5. serve as a liaison for the city with providers of free and low-cost civil legal services and coordinate among such providers to (i) maximize the number of low-income city residents who obtain free and low-cost civil legal services sufficient to meet the needs of such residents and (ii) ensure that such residents have access to such services during and after emergencies;

6. provide outreach and education on the availability of free and low-cost civil legal service programs; and

7. perform other duties as the mayor may assign.

c. Five-year plan. Within one year after the completion of the first

[http://public.leginfo.state.ny.us/lawsrch.cgi?NVLWO:](http://public.leginfo.state.ny.us/lawsrch.cgi?NVLWO)

Proof HRA's Commissioner lied on 4/11/17 about legal assistance:

HRA's Commissioner lied to my face on 4/11/17 by Borough Hall in Staten Island by claiming that the following legal services provider refused to provide me with legal assistance because it felt there was no merit to do so. Instead, its reason was due to a lack of adequate resources.



NORTHERN MANHATTAN IMPROVEMENT CORPORATION
8 CLINTON PLACE • BRONX, NY 10453
TEL. 347-269-5186 FAX. 929-281-2592

4/11/2017

Towaki Komatsu
802 Fairmount Pl 4B
Bronx, NY 10460

Dear Mr. Komatsu:

Hope this letter finds you well. Please be advised that as per close consideration of your case we will not be providing legal representation on your housing matter. The reason for closing is marked below.

- You have **satisfied all housing court requirements** and your housing court case is now discontinued (copy of discontinuance stipulation attached for your records)
- Unfortunately we **do not have the capacity to take on your case** at this time: Due to jurisdictional boundaries we do not have the resources to represent you in Queens Supreme Court.
- You have **failed to comply** with our requirements or failed to provide documents needed in a timely manner (last letter sent out attached/ list of documents required with compliance date attached)

Please note that our housing intake times are Tuesday through Thursday, 9am to 1pm.

Thank you.

NMIC Bronx Legal Services

9/15/16 New York State Administrative Law Judge's order HRA violated:

HRA has violated paragraph #4 in the excerpt below. This decision was issued on 9/15/16 by the New York State Office of Temporary and Disability Assistance for Fair Hearing number 7316477K. It concerned having HRA pay for storage expenses on my behalf because Urban Pathways, Inc. subjected me to a bait-and-switch fraud that prevented me from getting the private and fully-furnished apartment I signed a lease for on 2/16/16 in HRA's office.

request for Storage fee". The Agency did not present any other documents to sustain its determination.

Section 352.6 of 18 NYCRR provides that an allowance for storage of furniture and personal belongings shall be made when it is essential, for circumstances such as relocation, eviction or temporary shelter, so long as eligibility for public assistance continues and so long as the circumstances necessitating the storage continue to exist.

The Appellant's testimony is found to be credible to sustain his claim that he met *prima facie* eligibility for Storage fee Expenses on the grounds that he was residing in a temporary shelter which was too small to accommodate all his personal belongings and that he was a recipient of Public Assistance. Accordingly, the Agency's determination to deny the Appellant's request for Storage of Possession expenses cannot be sustained.

DECISION AND ORDER

The Agency's determination to deny the Appellant's application for Storage of Possession expenses is not correct and is reversed.

1. The Agency is directed to make a determination as to the Appellant's eligibility for Storage of Possession expenses from May 2016 to present time.

2. The Agency is directed to advise the Appellant of any additional documents which are required to make this determination.

3. The Agency is further directed to advise the Appellant in writing of its determination to provide any allowances to which the Appellant may be entitled.

4. In the event that the Appellant is found to be eligible for Storage of Possession expenses, the Agency is directed to make payments retroactive to the date of request.

Should the Agency need additional information from the Appellant in order to comply with the above directives, it is directed to notify the Appellant promptly in writing as to what documentation is needed. If such information is requested, the Appellant must provide it to the Agency promptly to facilitate such compliance.

As required by 18 NYCRR 358-6.4, the Agency must comply immediately with the directives set forth above.

1/27/17 letter HRA sent in which it lied:

HRA sent me a letter dated 1/27/17 in which it expressed that it would pay my storage fees for as long as I lived in a DHS shelter. It hasn't. Instead, it stopped paying those bills in violation of New York State law.

FIA-1127 (E) 02/23/14 LLF	NYC Human Resources Administration Department of Social Services	Family Independence Administration
CROTONA JOB CENTER (046) 1910 MONTEREY AVENUE, 1ST FLOOR BRONX, NY 10457	Date: <u>01/27/2017</u>	Case Number: <u>00037876365A</u>
0101250000000026	Case Name: <u>KOMATSU TOWAKI</u>	Center: <u>046</u>
KOMATSU TOWAKI 798-802 FAIRMONT PL 4B BRONX, NY 10460-		
Notice to Household of Storage Fee Payment to Vendor		
Dear <u>KOMATSU TOWAKI</u>		
We are notifying you that the agency has agreed to pay your storage fee of \$ <u>339.00</u> beginning <u>01 / 27 / 2017</u> . This payment is being made to:		
Vendor's Name <u>CUBESMART STORAGE FR K #6006</u>		
Vendor's Address <u>33-24 WOODSIDE AVE.</u>		
City: <u>QUEENS</u> State <u>NY</u> Zip Code: <u>11101</u>		
The account number assigned to you by the <u>CUBESMART STORAGE FR K #6006</u> facility is <u>#6006</u> .		
This payment will continue to be made as long as you reside in a Department of Homeless Services (DHS) shelter.		

New York Supreme Court lawsuit in which HRA's lawyer lied on 6/7/17 in court:

HRA lawyer Jeffrey Mosczyk lied repeatedly to Judge Nancy Bannon on 6/7/17 in New York Supreme Court in a case that I filed to have HRA compelled to comply with the 9/15/16 judge's order I discussed earlier and HRA's 1/27/17 letter to me.

WebCivil Supreme - Appearance Detail

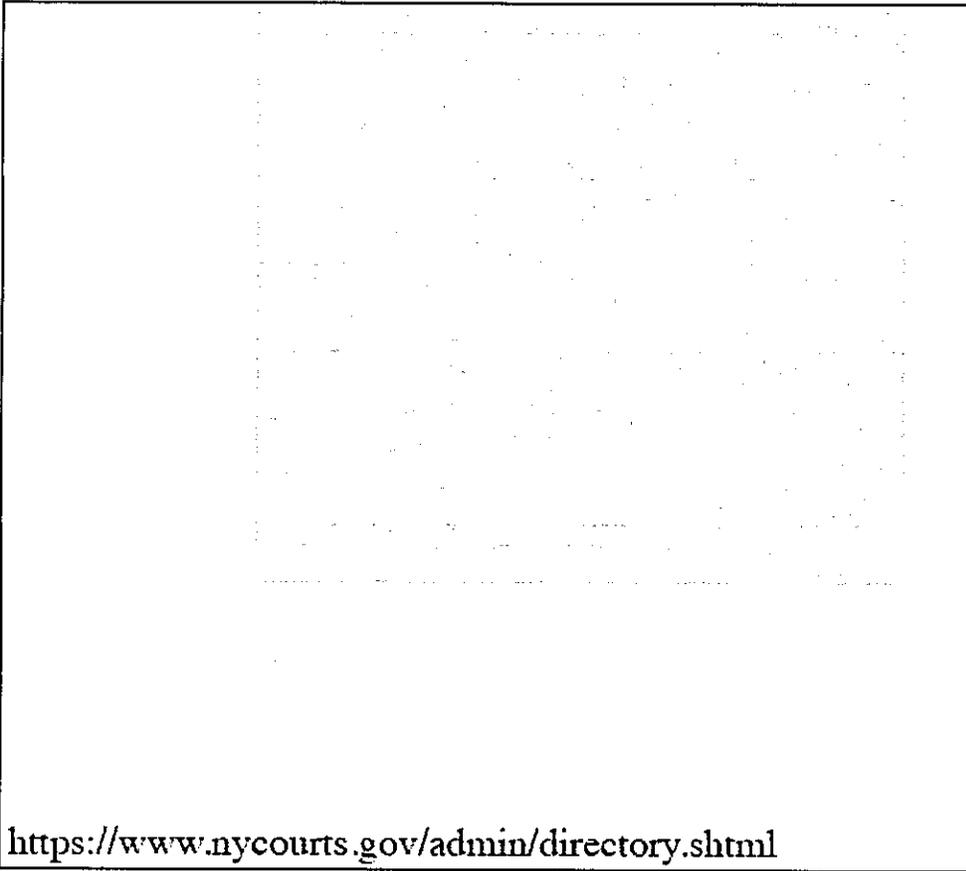
Court: **New York Civil Supreme**
Index Number: **100054/2017**
Case Name: **ANONYMOUS vs. NEW YORK CITY**
Case Type: **Article 78**
Track: **Standard**

Appearance Information:

Appearance Date	Time	On For	Appearance Outcome	Justice / Part
06/07/2017		Motion		BANNON, NANCY M. IAS MOTION 42
06/07/2017		Motion		BANNON, NANCY M. IAS MOTION 42
06/07/2017		Motion		BANNON, NANCY M. IAS MOTION 42
04/12/2017		Motion	Adjourned	BANNON, NANCY M. IAS MOTION 42
01/01/2017		Motion		BANNON, NANCY M. IAS MOTION 42

The court transcript can be ordered from the court reporter for the 6/7/17 court hearing by calling 646-386-3064. The cost for the transcript is \$199 for 2-week service and \$159 for 5-day service.

Confirmation the wife of HRA's Commissioner is the Supervising Judge Citywide for
NYC's Housing Courts and Steven Banks has a conflict of interest that should never have
let him become the Commissioner of HRA:



Jean T. Schneider
Housing Court, Citywide

Criminal Court:
Tamiko A. Amaker
New York County

Michael Yavinsky
Kings County

Michelle A. Armstrong
Queens County

George A. Grasso
Bronx County

<https://www.nycourts.gov/admin/directory.shtml>

The following is a description of the public town hall meeting that the New York City

Mayor's office held on 4/27/17 in the Long Island City area of Queens:

Source: <https://www.dnainfo.com/new-york/20170421/long-island-city/bill-de-blasio-town-hall-lic-april-27>

De Blasio to Host Town Hall in Long Island City



By Jeanmarie Evely | April 21, 2017 3:46pm | Updated on April 24, 2017 8:52am

@jeanmarieevelly



LONG ISLAND CITY — Residents will be able to get some face time with Bill de Blasio next week — without leaving the neighborhood.

The mayor will hold a town hall meeting at Queens Vocational and Technical High School at 37-02 47th Ave. starting at 7 p.m.

Thursday, his office announced Wednesday.



Mayor de Blasio at a town hall meeting in Queens in 2016.

DNAinfo/Kate Honan

The event is one in a series of similar meetings de Blasio has held across the city, where the mayor discusses local issues and takes questions from residents.

He'll be visiting Western Queens at a time when several of his big proposals are being criticized locally. Dozens of residents held a rally in nearby Sunnyside last week in opposition to his BQX Streetcar plan, his aim to develop Sunnyside Yards and to rezone part of Long Island City.

Space at the town hall is limited, and those who want to attend are asked to RSVP by April 25 by emailing TownHallRSVP@cityhall.nyc.gov or calling (212) 788-4282.

Doors for the event will open at 6 p.m.

Ge
Isl

Erea



WILLI
89 Per
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Black a
Show

LIGHT

**Photograph I took of Mayor's head of security (Howard Redmond) engaged in viewpoint
discrimination on 4/27/17 against me**

Created: Thursday, April 27, 2017 at 7:27:12 PM

Modified: Thursday, April 27, 2017 at 7:27:12 PM

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▶ More Info:

▶ Name & Extension:

▶ Comments:

▶ Open with:

▼ Preview:



Prior to me having any interaction with Mr. Redmond, he was sued at the United States District Court for the Southern District in a civil rights case. The following is the case citation for that lawsuit that seems to remain active: *Sherrard v. City of New York*, No. 15-CV-7318 (CM) (S.D.N.Y. Apr. 15, 2016).

Sherrard v. City of New York et al

New York Southern District Court Case Filed: Sep 16, 2015
 Judge: Colleen McMahon
 Referred: Kevin Nathaniel Fox
 Case #: 1:15-cv-07318
 Nature of Suit: 440 Civil Rights - Other Civil Rights
 Cause: 42:1983 Civil Rights Act

Docket Parties (15)

Docket last updated: 12 hours ago

Monday, May 22, 2017

- 83  ORDER granting82 Letter Motion for Extension of Time to File the Joint Pretrial Order. OK. (Signed by Judge Colleen McMahon on 5/22/2017) (ras)

- 82  JOINT LETTER MOTION for Extension of Time to File the Joint Pretrial Order addressed to Magistrate Judge Kevin Nathaniel Fox from Melanie Speight, on behalf of the parties dated May 22, 2017. Document filed by Howard Redmond.(Speight, Melanie)

- 81  NOTICE OF APPEARANCE by Tracey Andrice Grant on behalf of Kalan Sherrard. (Grant, Tracey)

-  Set/Reset Deadlines: Joint Pretrial Order due by 6/22/2017. (ras)

Sherrard v. City of New York et al

New York Southern District Court Case Filed: Sep 16, 2015
 Judge: Colleen McMahon
 Referred: Kevin Nathaniel Fox
 Case #: 1:15-cv-07318
 Nature of Suit: 440 Civil Rights - Other Civil Rights
 Cause: 42:1983 Civil Rights Act

Docket Parties (15)

Last checked: Monday Mar 14, 2016 8:20 AM EDT

Defendant City of New York	Represented By Melanie Mary Speight New York City Law Department contact info
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Defendant
Doe Redmond, Shield No. 95

Photograph I took of NYPD Officer Beato (badge # 13326) of the 108th Precinct after he illegally shoved me 3 times on the empty public sidewalk adjacent to the school that hosted the Mayor's 4/27/17 public meeting as I lawfully waited to ask the Mayor as he was leaving that meeting what he would do about Mr. Redmond having illegally discriminated against me by keeping me out of that meeting:

Created: Thursday, April 27, 2017 at 10:16:47 PM Modified: Thursday, April 27, 2017 at 10:16:47 PM <input type="checkbox"/> Stationery pad <input type="checkbox"/> Locked
▶ More Info:
▶ Name & Extension:
▶ Comments:
▶ Open with:
▼ Preview: 

The following is a description of the public meeting that the New York City Mayor's office held on 5/23/17 in the Bronx Supreme Court:



The Office of the Mayor and
Office of The Bronx Borough President



cordially invite you to:

CITY HALL IN YOUR BOROUGH: **CITY RESOURCE FAIR**

Tuesday, May 23, 2017 | 9:00 A.M. to 1:00 P.M.

The Bronx County Building
Veterans' Memorial Hall
851 Grand Concourse, Bronx, NY

Meet with top city commissioners and senior staff during scheduled office hours to address your questions and concerns.

Meet with top representatives from City Hall, Department of Transportation, Department of Finance, NYPD, Economic Development Corporation, Department of Education, Department of Health, Small Business Services, Department of Parks and Recreation, and more.

Sign Up Here to Attend: www.nyc.gov/bronx or by calling 212-748-0281

Screenshot from a video I legally recorded of 3 NYPD officers and a court officer that illegally violated New York State's Open Meetings Law while subjecting me to viewpoint discrimination in the Bronx Supreme Court on 5/23/17 that kept me out of the Mayor's public meeting that was held there on that date:

Created: Tuesday, May 23, 2017 at 9:40:25 AM
Modified: Tuesday, May 23, 2017 at 9:40:25 AM

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- Locked

▶ More Info:

▶ Name & Extension:

▶ Comments:

▶ Open with:

▼ Preview:



E-mail message I received on 6/7/17 from Shawn Kerby of the New York State Office of Court Administration concerning a FOIL request I submitted to it

From: FOIL <FOIL@nycourts.gov>
Subject: FW: Video footage from 3 security cameras in Bronx Supreme Court on 5/23/17
Date: June 7, 2017 at 11:11:48 AM EDT

We have the responsive footage copied on a DVD. Please provide a mailing address so that we may mail it to you.

Very truly yours,
Shawn Kerby
Assistant Deputy Counsel

Sent: Thursday, June 1, 2017 5:58 PM
To: DPS1 <DPS1@nycourts.gov>
Subject: Re: Video footage from 3 security cameras in Bronx Supreme Court on 5/23/17

Hi,

I'm sending you this message after having been referred to you yesterday by a court officer I met with at the Office of Court Administration's office located at 25 Beaver Street in Manhattan.

I would like to receive a copy of the video footage that was recorded on May 23, 2017 between 9 am and 11:40 am by the 3 security cameras that are attached to the ceiling in the hallway in the Bronx Supreme Court in the area between Room 105 and the entrance to the Veterans Memorial Hall that is closest to the Grand Concourse entrance to that courthouse.

The valid grounds I have for this request is that the following court officers assigned to that court and members of the NYPD flagrantly violated my civil rights and otherwise participated in a coordinated scheme to do so between the hours I listed above on that date by preventing me from entering the Veterans Memorial Hall to attend a public meeting that the New York City Mayor's Office held with commissioners of several New York City government agencies:

- a) Anthony Manzi (Captain of the court officers in the Bronx Supreme Court)
- b) A court officer holding the rank of Sergeant and whose last name is Brunner (badge #: 478)
- c) Lieutenant Nieves of the NYPD's Intelligence Division

d) NYPD Officer Gerola (badge #: 6577)

e) NYPD Deputy Inspector Howard Redmond

f) NYPD Detective Berkowitz (badge #: 7141)

Prior to the 5/23/17 civil rights violations, the last 4 individuals in the list above engaged in this flagrant misconduct on 4/27/17 outside of a public Town Hall meeting that the New York City Mayor held in Long Island City.

The following excerpt from the decision that the United States Supreme Court issued in the case of *Wilson v. Jean*, 145 F. Supp. 3d 434 (E.D. Pa. 2015) confirms that I was illegally subjected to viewpoint discrimination both on 4/27/17 and 5/23/17 by the NYPD and the court officers I interacted with on 5/23/17 in the Bronx Supreme Court:

As the Supreme Court recently held: "It is uncontested and uncontestable that government officials may not exclude from public places persons engaged in peaceful expressive activity solely because the government actor fears, dislikes, or disagrees with the views those persons express. It is equally plain that the fundamental right to speak secured by the First Amendment does not leave people at liberty to publicize their views whenever and however and wherever they please." *Wood v. Moss*, ___ U.S. ___, 134 S.Ct. 2056, 2066, 188 L.Ed.2d 1039 (2014)

<https://scholar.google.com/scholar_case?case=3248757160989255314&q=%22Wood+v.+Moss%22+viewpoint&hl=en&as_sdt=6,33> (internal citations omitted) (addressing qualified immunity in the context of protesters' First Amendment claims alleging Secret Service agents engaged in viewpoint discrimination when they moved protesters away from the location of the President while allowing supporters to remain in their original location).

Screenshot from a video recording that the New York State Office of Court Administration provided to me from video footage its security cameras inside the Bronx Supreme Court recorded on 5/23/17 and shows NYPD Lieutenant Nieves of its Intelligence Division illegally stalking me in that court on that date while NYPD officers had no jurisdiction in that court, unlike the court officers assigned to it that helped the NYPD illegally subject me to viewpoint discrimination:



At the time this video was recorded, I was talking with a reporter for the New York Post about being discriminated in that court by the NYPD and court officers by not being allowed into a public meeting that was being held in the Veterans Memorial Hall located inside of that courthouse. One of the people who attended that public meeting was Steven Banks, who is the Commissioner of the New York City Human Resources Administration. He has repeatedly lied to me about having me provided with legal assistance and legal representation through his agency that is required by law to “ensure” that I have access to such legal assistance from the legal services providers his agency works with. His agency also does business with Defendant NTT Data, Inc.

Reasons to Fire Steven

Banks of New York City's

Human Resources

Administration & His Team:

Introduction

Although I support Ben Kallos' bill (Int. No. 855A), it's entirely inappropriate for anyone to consider supporting it until huge flaws within HRA are fully resolved that demand the immediate firing of Steven Banks and other members of HRA.

Facts about HRA you should know:

1. HRA's Commissioner told an audience on 12/16/16 at the New York Law School the following:

"The things we can control, we're very focused on trying to control."

2. HRA demonstrates such control at my expense and taxpayers with a conscience by doing business with NTT Data, Inc. that stole overtime, committed fraud, and illegally retaliated against valid whistleblower complaints I filed in 2012 by firing me from a job I had with Credit Suisse through an I.T. outsourcing arrangement with NTT. Information about a new contract worth more than \$3.5 Million HRA issued to NTT was published in New York City's "City Record" report on 5/30/17.

3. HRA and other New York City government agencies have consistently refused to grant me job interviews for jobs I've held, am fully qualified for, and pay more than \$60,000 per year, despite the fact that Mayor urged firms to hire veterans whenever possible.
4. HRA does business with an alleged nonprofit organization that acts as a landlord and is named Urban Pathways, Inc. Urban committed a bait-and-switch fraud against me with respect to an apartment lease agreement I signed in HRA's offices on 2/16/16 in front of witnesses and with Lisa Lombardi of Urban. In doing so, Urban illegally forged my signature in an apartment lease agreement I never signed and refused to issue me the specific apartment that I signed the apartment lease agreement for on 2/16/16. These factors caused me to live in a tiny room in a shared and largely unfurnished apartment with a roommate named Ronald Sullivan who stole food I bought for myself and assaulted me on 7/2/16 that caused me to be diagnosed with a concussion on 7/30/16 and have lingering post-concussive symptoms associated with a medical condition known as a traumatic brain injury (TBI). HRA's records confirm I notified it of the bait-and-switch on 3/16/16. However, HRA failed to take appropriate corrective action against Urban to which it gave more than \$1.8 Million of taxpayer funds for the apartment building where I reside, according to information available in New York City's "City Record" report. Prior to being assaulted on 7/2/16, Mr. Sullivan tried to do so in the same living room on 5/12/16, but was physically restrained by one of Urban's workers. Prior to 7/2/16, Mr. Sullivan told me he didn't get along with one of his roommates in Brooklyn that partly caused him to become my roommate, he had a history of violence, and he was receiving disability benefits. After he assaulted me on 7/2/16, Urban's security logbook indicated that "disabled" person appeared angry as he ran out of my apartment building to elude the NYPD that was on its way to my apartment building.

5. HRA does business directly or indirectly with a storage and moving company named Baya Inc. that uses other aliases and illegally took possession of my property on 10/22/15 in violation of the terms of New York General Business Law § 607 and likely stole or lost a substantial amount of valuable property of mine that was missing when I reclaimed my property from it on 11/23/15. Baya, Inc. violated the law when it took possession of my property because it failed to first issue me a signed storage agreement.
6. HRA is figuratively and literally married to New York City and New York State court system that have been responsible for the following illegal acts against me:
 - a. Evicting me from my apartment on 10/22/15 after I was illegally denied of my due process right to present any pertinent evidence and a judge conducted a fraudulent inspection in my apartment on 7/10/15 with 2 court officers I partly and legally recorded on audio.
 - b. Allowing frivolous lawsuits to be filed and persist against me by a slumlord I previously prevailed against in court.
 - c. Ordering me to be arrested in court for pointing out to the Supervising Judge of the Queens Supreme Court that he wasn't doing his job by allowing misconduct by his subordinated judges to persist in a frivolous \$20 Million defamation lawsuit I ultimately prevailed in on 3/23/17 and after nearly 3 years in that case and 5 judges assigned to it that wrongfully let it persist.
 - d. Illegally discriminating against me on 5/23/17 in the Bronx Supreme Court in violation of the New York State's Open Meetings Law, a U.S. Supreme Court case about viewpoint discrimination, and the court's own policy about being open to the public by keeping me out of its Veterans Memorial Hall room, where the Mayor's office was holding a public

- meeting.
- e. Illegally issuing a default judgment against me on 8/5/14 in violation of CPLR 3215 and Judge Inez Hoyos' awareness on 7/22/14 of housing maintenance code violations in my former apartment building in Rego Park that made a default judgment impossible to issue.
 - f. Illegally giving me just 3 days to prepare for trial in violation of my due process rights, after I had just moved into a new apartment and while my belongings were disorganized and still in moving boxes in a frivolous lawsuit Judge Hoyos was assigned to.
 - g. Illegally issuing a sanction against me and making false statements in a judge's 6/9/17 decision that will be reversed on appeal and violates my 1st Amendment right to protesting against organizations that have business with NTT Data, Inc., as it continues to subject me to wage-theft, fraud, and retaliation.
 - h. Illegally issuing court decisions after the 60-day deadline CPLR 2219 established.
 - i. Illegally excluded pertinent security logs as evidence during the criminal trial of Ronald Sullivan in February of 2017 that was for having assaulted me on 7/2/16.
7. Steven Banks and others at HRA have lied to and otherwise deceived me, you, and others repeatedly while in and out of court and about matters that have cost taxpayers. For these reasons, their lies and deceit should cost them their jobs without delay. Steven Banks lied to my face on 12/16/16 at the New York Law School, 4/11/17 in Staten Island, and he lied to deceived you on 4/20/17 in this room while talking about there not being a reason for someone who has been evicted to move from Queens to the Bronx. I did precisely that when I was illegally evicted.
 8. The litigation against HRA I commenced at the New York Supreme Court was due to HRA's

refusal to provide me with a public assistance storage benefit I'm entitled to receive because of my circumstances, HRA's negligence, and Urban Pathways, Inc.'s fraud. That lawsuit was necessary because though the New York State Office of Temporary and Disability Assistance issued a decision on 9/15/16 in my favor about storage expenses, it negligently refuse to enforce its own binding decision and instead scheduled pointless and redundant new appeal hearings (fair hearings) about the same matter. OTDA also failed to schedule appeal hearings I requested in February about additional public assistance matters HRA fraudulently denied and otherwise ignored. In the litigation I filed against HRA at the Supreme Court, though HRA flagrantly violated the court's own rules about requesting an adjournment, the judge nonetheless granted HRA's request while violating my fundamental due process right to oppose that request. Also, HRA's lawyer Jeffrey Mosczyk repeatedly lied to the judge on 6/7/17 at the New York Supreme Court. It's also worth mentioning that though a judge granted my request to seal that case and let me proceed anonymously in it, the court violated its own order by publishing my name on the Internet in relation to that lawsuit. Therefore, the court's order that granted me the seal and anonymity is null and void.

9. HRA's failure to ensure that there was adequate security in its Bellevue homeless shelter between February and April of 2016 is responsible for **a)** why my iPhone was stolen from it while no door locks were installed for the room where I temporarily stayed there between 2/21/16 and 2/22/16 and **b)** someone having been killed by having his throat slit in that shelter in April of 2016 after I told Steven Banks on 3/1/16 at New York City's Yale Club about problems with security in that shelter.
10. HRA has ignored valid complaints I filed with it about repairs needed in my apartment building. Conditions requiring repair that I reported on 4/1/16 to Barbara Beirne of HRA via

e-mail have not been fixed.

Notice Details

TITLE: IT CONSULTING SERVICES FOR VARIOUS PROJECTS

Section

Procurement

Category

Services (other than human services)

Agency Name

Dept Of Social Svcs/Human Resources Administration (HRA)

Selection Method

Intergovernmental Purchase

Agency Division

Contracts

Publication Date

5/30/2017

Vendor Information

NTT Data Inc.
100 City Square, Boston, MA 02129

Notice Type

Award

Contract Amount

\$3,572,308.23

PIN

PIN#09617G0010001

Additional

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Procurement

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New York,
2017,
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d/or need
) 221-5555.

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ractor listed
Homeless
, 2017 to
o June 30,

If you need to schedule an inspection appointment and/or need additional information, please contact Donna Wilson at (929) 221-6353.

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HUMAN RESOURCES ADMINISTRATION

■ PUBLIC HEARINGS

NOTICE IS HEREBY GIVEN that a Contract Public Hearing will be held on Thursday, April 20, 2017, in Spector Hall, 22 Reade Street, Main Floor, Borough of Manhattan, commencing at 10:00 A.M. on the following:

IN THE MATTER OF a proposed contract between the Human Resources Administration of the City of New York, and the vendor listed below, for the Provision of Legal Services for Veterans. The term of this contract will be for one year from July 1, 2016 to June 30, 2017.

<u>Contractor/ Address</u>	<u>E-PIN</u>	<u>Amount</u>	<u>Service Area</u>
New York Legal Assistance Group 7 Hanover Square, 18th Floor, New York, NY 10004	09617L0208001	\$200,000.00	Citywide

The proposed contractor is being funded through City Council Discretionary Funds Appropriation, pursuant to Section 1-02 (e) of the Procurement Policy Board (PPB) Rules.

A draft copy of the proposed contract will be available for public inspection, at the Human Resources Administration of the City of New York, 150 Greenwich Street, 37th Floor, New York, NY 10007, on business days, from April 7, 2017 through April 20, 2017, excluding holidays, from 10:00 A.M. to 5:00 P.M. If you need to schedule an inspection appointment and/or need additional information, please contact Mr. Paul Romain at (929) 221-5555.

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Testimony in Support of Int. 855-A by Chelsea Mauldin
June 27, 2017

20 Jay Street, Suite 910
Brooklyn, NY 11201
Phone 646 535 6535
info@publicpolicylab.org

Esteemed Councilmembers:

Thank you for the opportunity to present testimony in support of Int. 855-A, Automatic Benefits.

I'm the executive director of the Public Policy Lab, a nonprofit organization committed to using human-centered innovation practices to address the challenges facing low-income and vulnerable Americans. Our organization has worked with multiple federal and municipal agencies on issues of benefits access. For example, we're currently partnering with the New York City Department of Education's Office of Community Schools to explore how to support families of very low income students in getting screened for benefits eligibility and, ultimately, enrolling in programs such as SNAP (food stamps) and WIC.

Our field research with staff members in Community Schools and with family members of students suggest that eligible New Yorkers don't take advantage of valuable tools for family financial stability because of the complexity of enrolling in public programs and then maintaining their enrollment over time. Our work has shown the profound challenges that current benefits enrollment requirements place on people who are already stretched for time and money – and who may additionally be required to navigate complex enrollment processes while dealing with low literacy skills, either in English or their first language.

I believe that Introduction 855-A will be a valuable support for vulnerable families. Automatic benefits enrollment, automatic renewal, eligibility notices generated in response to tax filings, and a universal application form would all benefit the in-need families that struggle most with the current process.

Sincere regards,



Chelsea Mauldin
Executive Director, Public Policy Lab

Board of Directors

Bryan Boyer
David Gibson
Deborah Marton
Chelsea Mauldin
John Payne

The Public Policy Lab is
a tax-exempt 501(c)(3)
nonprofit organization.

1199 SEIU

United Healthcare Workers East

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Veronica Turner

TESTIMONY BEFORE THE NEW YORK CITY COUNCIL GENERAL WELFARE COMMITTEE JUNE 27, 2017

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Ana Vazquez
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Margaret West-Allen
Nadine Williamson-Seals
Noreen Wray-Roach
Gladys Wrenick
Sui Ling Xu

GENERAL COUNSEL
Daniel J. Ratner

CHIEF FINANCIAL OFFICER &
DIRECTOR OF ADMINISTRATION
Michael Cooperman

Thank you Speaker Melissa Mark Viverito, Chairperson Stephen Levin, Council Member Ben Kallos, and members of the General Welfare Committee for this opportunity to testify in support of Intro. 855-A. I am here today on behalf of 1199 SEIU-UHWE, representing close to 200,000 health care workers residing in New York City.

Intro 855-A offers exciting prospects for how the City more efficiently serves its residents. For decades, advocates have championed the concept of a universal application for municipal services, instead of requiring separate applications for each service. In a pre-computer era, this was a viable option. Today, however, with the tremendous advances in technology and the capacity for agency interconnectivity, the time is right for introducing and implementing a universal application process.

If enacted, Intro. 855-A provides a bold first step towards needed interagency collaboration. For example, a person applying for food stamps – by filing one single application – will learn about other services for which they are also eligible but may not have been aware of.

To be fully implemented, lawmakers in Albany and in Washington, DC will need to modify existing rules and regulations. But this is a first step. We in New York City can model the process for the rest of the country.

1199 SEIU-UHWE fully supports Intro 855-A and urge the City Council to enact this groundbreaking piece of legislation that will go a long way toward making it easier for New Yorkers to navigate the existing bureaucracy, and make the internal workings of the agencies more effective.

Thank you again for this opportunity to testify.

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**Mercedes Jennings, Partnership for the Homeless: Testimony Re T2017-6095
("Oversight-From PATH to Permanency: Navigating the Shelter System as a Family with Children")
and In Support of Int 1597-2017 and Int 1642-2017**

Introduction

Good morning, and thank you for this opportunity to testify. My name is Mercedes Jennings, and I have worked as an Education Advocate at The Partnership for the Homeless (the "Partnership") for two-and-a-half years. As you may know, the Partnership is a non-profit organization that provides an array of services for New Yorkers experiencing homelessness, at risk for homelessness, or who are rebuilding their lives after leaving shelters.

Through its activities and advocacy on behalf of its clients, the Partnership has learned of the numerous difficulties and barriers homeless families confront. As an Education Advocate, I have become particularly attuned to the challenges facing homeless students and how those challenges make it extremely difficult for homeless students to obtain an adequate education. I appreciate the opportunity to speak today about the families I have worked with and to discuss some ideas that would improve access to education for children facing homelessness. I also appreciate the opportunity to bring to the Committee's attention the "Family Options Study," which was developed in part by one of the Partnership's board members, Professor Marybeth Shinn. The study demonstrates the advantages of rent subsidies—such as those that would be expanded and rendered more permanent under two pieces of legislation being considered today—to assist families who are facing eviction, homelessness, or the loss of housing.

The Partnership's Firsthand Experiences

As an Education Advocate, I have seen first-hand the difficulties facing homeless students. A major difficulty homeless families face arises from being placed in a shelter far from the school of origin of the family's children. Although it is PATH's policy to place a family near the school of origin of a family's youngest child, a majority of families are placed in shelter outside their borough of origin. For parents that want to keep their children in their school of origin, receiving a shelter placement outside of the family's original borough of residence represents a significant challenge, as long travel times, late arrivals, and reduced opportunities to participate in extra-curricular activities preclude homeless students from obtaining equal access to public schools. Further, our clients report that the resources available to mitigate the difficulties of a long commute to school are inadequate. For example, the Office of Pupil Transportation ("OPT") is required to take at most seven school days from receipt of a busing request to investigate whether there is an existing route, or if OPT can create a route for the child to be transported to his or her school of origin from the assigned shelter. From my experience as an Education Advocate in East New York and the data we collected from clients in our Education Rights Project, a student can wait two to three weeks before being placed on a bus route. Moreover, there is a large number of homeless students who were not assigned a bus route on account of no route existing and the creation of a bus route not being unfeasible. In the course of my work at the Partnership, I have met homeless families where children as young as

five years old travel almost three hours by train to and from their shelter in the Bronx to their school in East New York, Brooklyn. To prevent these situations, placement near homeless students' school of origin should be a paramount factor in assigning homeless families to shelter.

In addition to lengthy commutes, other difficulties affect homeless families during the PATH process. Although DHS has discontinued the requirement that children return with their parent to every PATH appointment after the initial intake, families have reported that PATH has not communicated this change in policy and/or still request their children's presence at PATH. In addition, homeless students' schools are often not informed that a family is entering homelessness. As a result, homeless students do not receive support from teachers and guidance counselors and students can incur an excessive number of unexcused absences as a result of a student arriving late after a lengthy commute to school. A viable solution to this would be to require that the DOE liaison at PATH meet with the family and either contact their child's school or provide documentation that the parent can then forward to the child's school. I have found that schools are willing to work with families entering homelessness if teachers and guidance counselors are notified by an administrator within DOE or have documentation demonstrating that a family is going through the PATH process.

Further, we have learned that many families lack knowledge of the services available to aid their children in accessing public education. To ensure that families are empowered with knowledge of the services that they are eligible to receive, written materials describing services available for homeless families should be made available in the main offices and front entrances of every New York City school as well as at PATH. Also, all school staff should attend mandatory trainings and workshops that address education-related services for homeless families, the McKinney-Vento Homeless Assistance Act, and the emotional stress that homeless children face.

Additionally, we have learned that the manner by which DHS defines homelessness results in certain families not obtaining needed support. Although the McKinney-Vento Homeless Assistance Act defines children awaiting their permanent foster care placement as homeless, DHS defines homelessness as limited to families that are residing in shelter. DHS's limited definition of homelessness helps explain the struggle that new foster parents have in obtaining housing subsidies, and it also limits the availability of services for those families who are homeless but may not be residing in shelter, such as those who are temporarily doubled-up with friends or relatives.

IBO Report on the Serious Challenges Facing Homeless Students

Recently, New York City's Independent Budget Office ("IBO") published a report that confirms what we have been observing for some time at the Partnership. According to the IBO's October 2016 Report, "Not Reaching the Door: Homeless Students Face Many Hurdles on the Way to School" (the "Report"), the population of homeless children in NYC has increased rapidly in recent years, and homeless children face serious challenges to obtaining a good education.

There was a 25 percent increase in the number of temporarily housed youth attending schools run by the New York City Department of Education (“DOE”) from school years 2010-2011 to 2013-2014, with nearly 83,000 students living in temporary housing in school year 2013-2014. Challenges are particularly acute for children living in the shelter system, as they not only bear the disruptions and emotional burdens associated with life in a shelter, but also face major obstacles to educational access and stability. IBO statistics reveal that, relative to their peers, students living in shelters have much lower attendance rates and account for a much greater share of students categorized as “chronically absent.” The impact of such gaps and inconsistencies in schooling are devastating and are often difficult to reverse. Chronic absenteeism, for example, is associated with lower academic achievement, increased dropout rates, and reduced college and career preparedness. More generally, students living in shelters are more likely to have behavioral problems and to underachieve academically. In other words, housing students in shelters can perpetuate a tragic cycle of poverty.

The IBO identified a number of deficiencies in the current system that prevent homeless children from obtaining the equal access to education to which they are entitled under the federal McKinney-Vento Homeless Assistance Act as well as New York Education Law § 3209. One of the most significant obstacles is the failure to place families with homeless children in temporary housing near the children’s school of origin (*i.e.*, the school they attended prior to experiencing homelessness). Moving homeless children—who, by definition, are already in the midst of a major upheaval—out of their schools of origin is enormously disruptive to their educational development and overall well-being. That is why both state and federal law impose a strong presumption in favor of allowing homeless students to remain in their school of origin. These statutory mandates, however, are severely undermined when, as is so often the case, the City places children in shelters far from their original communities, necessitating either long, untenable commutes or school transfers. Indeed, homeless families are frequently faced with the difficult choice of either uprooting their children from their educational community by transferring them to a school closer to where the family is housed or managing a daily, hours-long commute to and from the school of origin that is bound to have a negative impact on their children’s education.

Mayor’s Plan, Proposed Legislation, and Family Options Study

Mayor de Blasio’s “Turning the Tide on Homelessness” plan, announced in February 2017, acknowledges the importance of keeping families facing homelessness in their communities and keeping students enrolled in their school of origin. Indeed, the professed goal of the plan is to “keep residents in the boroughs they called home when possible, so that breadwinners do not lose jobs, children do not have to switch schools or experience long commutes and people can also be close to their medical needs and preferred places of worship.” Yet, the central component of the Mayor’s plan—building 90 new shelter facilities and expanding 30 existing shelters over the next five years, at great expense—will take years to implement, will do nothing in the near term to improve educational access for homeless students and may not significantly ameliorate the current problem even when it is completed.

In contrast, efforts to expand the availability of rental assistance for children and families facing eviction, homelessness, or the loss of housing—including several initiatives previously launched by the Mayor as well as two pieces of legislation being considered today—offer a more promising and immediate solution. We believe that two proposals before the committee today, Int 1597-2017 and Int 1642-2017, would make it easier for families facing homelessness to keep their children enrolled in their school of origin by:

- Allowing youths who have spent time in foster care to be eligible for rental assistance vouchers that would allow them to obtain stable housing;
- Removing time limits on families' eligibility to receive rental assistance vouchers established by the Department of Social Services, such as the LINC, CityFEPS and SEPS vouchers, so long as the household continues to meet other eligibility requirements; and
- Requiring that the maximum rent toward which rental assistance vouchers may be applied annually increases at the same rate as the fair market rents set by the United States Department of Housing and Urban Development ("HUD").

According to DHS, as of June 19, 2017 there were 58,404 individuals in the shelter system, including over 12,000 families with children and over 22,000 children. Moreover, between Fiscal Year 2011 and Fiscal Year 2016, the average length of stay in the shelter system for families with children increased significantly, from 258 days to 431 days. The trend towards families with children remaining housed in shelters for greater periods of time is significant and alarming in light of the serious negative ramifications that being housed in a shelter tends to have on a student's education. By reducing the number of students who need to enter shelters in the first place, as well as the average length of any stay in the shelter system, these proposals are likely to improve educational access for students facing homelessness by making it more feasible for such students to continue to attend their school of origin.

The Family Options Study, which I briefly mentioned earlier, lends empirical support to the proposition that the proposed legislation would improve outcomes for students facing homelessness. In 2008, HUD launched the Family Options Study in an effort to examine the effectiveness and relative costs of different interventions that communities may implement to assist families experiencing homelessness. As part of the study, almost 2,300 homeless families, including more than 5,000 children, across 12 communities were randomly assigned to one of four interventions: (1) priority access to a permanent housing subsidy, (2) priority access to project-based transitional housing, (3) priority access to community-based rapid re-housing, or (4) "usual care" assistance, without priority access to any particular program.

Ultimately, the Family Options Study found that permanent housing subsidies were the most effective way to combat homelessness. The provision of housing subsidies, relative to other interventions, resulted not only in the most significant reductions in rates of homelessness, but also the greatest improvements in residential stability. It is not surprising, therefore, that housing subsidies also appear to have a profoundly positive impact on students' educational

outcomes, improving school stability and reducing rates of absenteeism and behavioral problems. Housing subsidies also resulted in the most dramatic improvements in terms of reducing family separations and improving access to health care and food security. What is more, given that it costs approximately \$41,000 per year to house a family in a City shelter—not to mention the cost of building or expanding over 100 shelters—the proposed expansion of rental subsidies is likely to cost taxpayers far less than continued reliance on the shelter system as the primary remedy to homelessness. Instead of expanding the institutionalization of homelessness by building more City-run shelters for families to live in, we should be devoting our resources to keeping people in their homes and neighborhoods.

“Automatic Benefits” Testimony

To: New York City Council, Governmental Operations Committee.
From: James Allen, Student, Brooklyn Law Incubator and Policy Clinic (BLIP)
Date: TBD
Topic: Int. No. 855 (“Automatic Benefits” Bill) Testimony

Dear New York City Council,

Thank you Council Members Kallos, Wills, Rosenthal, and the entire Governmental Operations Committee. My name is James Allen and I am a student and participant in the Brooklyn Law Incubator and Policy (BLIP) Clinic.¹ I write to commend the committee for introducing Int. No. 855, (the “Automatic Benefits” bill), because I believe it will more efficiently streamline the accessibility of benefits for eligible New Yorkers.

The Automatic Benefits bill would use information from tax filings to identify eligible benefits and programs to which New Yorkers could enroll or apply to enroll.² Under the bill, governmental agencies (through computer programming) will identify potential public benefits, pre-fill applications for individuals who may be eligible for those benefits, and notify individuals if further information is needed. In doing so, New Yorkers who are now perplexed or overwhelmed by bureaucratic processes or paperwork will be able to more easily access the benefits that they are entitled to under law. This bill, through restructuring the “choice architecture” of those applying for benefits, is likely to modernize the paperwork process and aid the lives of some of New York’s most disadvantaged. The Automatic Benefits bill will also help support the state and local economy.³

Automatic Benefits Bill as Positive Choice Architecture

¹ *Brooklyn Law Incubator and Policy Clinic*, BROOKLAW.EDU, <https://www.brooklaw.edu/intellectuallife/cube/overview?>

² Int. No. 855.

³ For example, take a report by the Annie E. Casey Foundation, the Ford Foundation, and the Open Society Institute which found,

the Bridge to Benefits program in Minnesota calculated that efforts to maximize benefits had the potential to inject \$1 billion into the state’s economy in 2008. Specifically, the program estimated that its efforts could help recipients draw the following in federal funds: \$432 million in EITC benefits, \$250 million in food assistance, \$132 million for child care, \$109 million through school meal programs, and \$77 million for energy assistance. Additionally, states that incorporate technology-based solutions can increase efficiency and reduce costs by improving error rates. IMPROVING ACCESS TO PUBLIC BENEFITS, HELPING ELIGIBLE INDIVIDUALS AND FAMILIES GET THE INCOME SUPPORT THEY NEED, ANNIE E. CASEY FOUNDATION (April 2010) <http://www.aecf.org/m/resourcedoc/AECF-ImprovingAccessToPublicBenefits-2010.pdf>.

As identified by behavioral psychologists Richard Thaler and Cass Sunstein, “many people will take whatever option requires the least effort, or the path of least resistance.”⁴ This results in procrastination or inaction (e.g., not completing the paperwork for crucial benefits that may be available to you.). Choice Architecture is the theory of designing those choices to avoid traditional human reactions such as procrastination.⁵ Our representatives, in their capacity as public servants, can use tools in Choice Architecture to encourage the public to make healthier, more positive decisions. These “nudges” are understood as initiatives that maintain freedom of choice while also steering people’s decisions in the right direction (as judged by people themselves).⁶ The Automatic Benefits bill is a positive nudge through additional disclosures and simple changes in framing and current defaults.

- **Disclosures** are often a favored form of public policy because they are a low-cost, transparent, and efficient method of informing consumers or constituents while leaving them with the autonomy to make their own decisions. Examples of disclosures include health warnings, hazard and safety warnings, energy-efficiency information, and privacy information.⁷ The Automatic Benefits bill would be like these disclosures, allowing potential beneficiaries to be more informed and thus make better choices. Additionally, the informative nature of disclosures is a way to raise awareness (as often, potential beneficiaries are not making use of these benefits because they are unaware that they are available).
- **Defaults** establish what happens if people do nothing at all, which is very often the case.⁸ Under the current default, because people lack knowledge of available public benefits (often people in the most need), they will tend to not enroll. The change proposed in the Automatic Benefits bill will set a new default by enrolling eligible benefit recipients into programs using information from tax forms and by pre-filling all available information and disclosing the few steps required to complete the filing. This is likely to encourage enrollment.
- **Framing** centers around the idea that choices depend in part on the ways problems are stated. By providing “written notices of the public benefits the individual *would be receiving*,” the departments would be framing the disclosure in a manner more likely to increase applications and renewal of benefits.⁹ The bill would also provide much needed support through web-based platforms and telephone outlets, allowing New Yorkers to more easily navigate the benefit programs or application processes.¹⁰

To be clear, the Automatic Benefits bill is not requiring any New Yorker to make a choice not already available to them, it is simply establishing a process “that will make it more likely that

⁴ Richard Thaler & Cass R. Sunstein, *NUDGE: IMPROVING DECISIONS ABOUT HEALTH, WEALTH, AND HAPPINESS* AT 83, YALE UNIVERSITY PRESS (2008).

⁵ See Ted O’Donoghue & Matthew Rabin, *CHOICE AND PROCRASTINATION*, 116 Q.J. ECON. 121, 121–22 (2001).

⁶ Thaler & Sunstein, *supra* note 4 at 8.

⁷ George Loewenstein, Cass R. Sunstein, & Russell Golman, *Disclosure: Psychology Changes Everything* at 392–93 Annual Reviews – Economics (March 2014) <https://www.cmu.edu/dietrich/sds/docs/loewenstein/DisclosureChgsEverything.pdf>

⁸ O’Donoghue & Rabin, *supra* note 5.

⁹ *Int. No. 855* (emphasis added); Thaler & Sunstein, *supra* note 4 at 36.

¹⁰ *Int. No. 855*; see also *IMPROVING ACCESS TO PUBLIC BENEFITS, HELPING ELIGIBLE INDIVIDUALS AND FAMILIES GET THE INCOME SUPPORT THEY NEED*, ANNIE E. CASEY FOUNDATION (April 2010) <http://www.aecf.org/m/resourcedoc/AECF-ImprovingAccessToPublicBenefits-2010.pdf>.

people will promote their own ends, as they themselves understand them.”¹¹ The Automatic Benefits bill is simply providing more amenable and more understandable choice architecture to public benefits processing.¹² As such, I believe the City Council should take steps to enact this bill, improving people’s welfare by “influencing their choices without imposing material costs on those choices.”¹³

Automatic Benefits Bill Bridging the Technological Divide

Through the creation of technological infrastructure, using free and open-source software, the Automatic Benefits bill will also substantially shift how governmental bureaucratic processes are handled.¹⁴ This shift will clear red-tape which has hindered the access to benefits – particularly for those in lower-income and elderly communities.¹⁵ For example, in Louisiana, after implementing auto-enrollment for health insurance, the percentage of children losing coverage at the end of their eligibility periods went from 28 percent in 2001 to 8 percent in 2005.

As noted by Council Member’s Kallos’s office, additional examples of programs like automatic benefits in government include:

- Social security beneficiaries turning 65 are automatically enrolled in Medicare, in most cases.
- Social Security Disability Insurance recipients are automatically enrolled in Medicare parts A and B after 2 years.
- Categorical eligibility offers benefits such as SNAP, WIC, and TANF, to families already receiving other benefits, though an additional financial eligibility determination is not necessary, an application is still required.
- Free Application for Federal Student Aid (FAFSA) provides a single application for student aid, work-study, and loans for higher education.¹⁶

I urge the Governmental Operations Committee to support Int. No. 855 and to advance the bill out of Committee favorably. Thank you for the opportunity to present testimony and for your consideration of my comments regarding the Automatic Benefits bill.

Sincerely,

James Allen
Brooklyn Law School, J.D. Candidate 2018
65 Atlantic Ave. Apt. 8
Brooklyn, NY 11201

¹¹ Cass R. Sunstein, *WHY NUDGE?* AT 19, YALE UNIVERSITY PRESS (2014).

¹² *Id.* at 53.

¹³ *Id.* at 53.

¹⁴ Beth Simon Noveck, *Automatic Benefits: Reducing Red Tape, Improving Lives*, GOVERNING.COM (Aug. 17, 2015) <http://www.governing.com/blogs/bfc/col-automating-benefits-efficiency-tax-filing-service-delivery.html>

¹⁵ *see also* IMPROVING ACCESS TO PUBLIC BENEFITS, HELPING ELIGIBLE INDIVIDUALS AND FAMILIES GET THE INCOME SUPPORT THEY NEED, ANNIE E. CASEY FOUNDATION (April 2010) <http://www.aecf.org/m/resourcedoc/AECF-ImprovingAccessToPublicBenefits-2010.pdf>.

¹⁶ Support Low Income New Yorkers, BENKALLOS.COM (<http://benkallos.com/press-release/%E2%80%9CAutomatic-benefits%E2%80%9D-support-low-income-new-yorkers>).



Statement of

Pamela Loprest *

Senior Fellow, Urban Institute

before the

New York City Council

Committee on General Welfare

“Process of Applying for Assistance” Proposed Int. No 855-A

Tuesday, June 27, 2017

* The views expressed are my own and should not be attributed to the Urban Institute, its trustees, or its funders.

Honorable Council Members:

Thank you for the opportunity to testify today about New York City's automatic benefits legislation. My name is Pamela Loprest, and I am an economist and senior fellow at the Urban Institute, a nonprofit economic and social policy research institute in Washington ,DC. I have more than 25 years of experience researching ways to improve economic opportunities and well-being of low-income individuals and families. My testimony today draws on intensive work with six states on improving the well-being of working families while improving program efficiency through improvements in benefit access. This project, called the Work Support Strategies (WSS) project, is a collaboration of the Urban Institute, the Center on Law and Social Policy and the Center for Budget and Policy Priorities (CBPP) funded by the Ford Foundation. I also draw on related work by my colleagues for states and localities across the country focusing on benefit integration and implementation of the Affordable Care Act. In this testimony, I will discuss the following points:

1. Receipt of public benefits improves individual and family well-being
2. Many people eligible for public benefits are not receiving them
3. Many states and localities have reached more eligibles by using information on their receipt of other public benefits
4. Providing information and reducing the burden of application can increase access

Receipt of public benefits improves individual and family well-being

Most public benefit programs target a specific need, such as food, medical care, energy, housing, or child care assistance. Because many low-income people and families have multiple needs, receipt of all supports for which they qualify can help stabilize their lives, promote work, and improve the health and well-being of their children. In New York, state and federal safety net programs lift an estimated 3.1 million New Yorkers out of poverty each year (CBPP 2016). Research suggests that working families who get and keep core public benefit programs (medical, nutrition and child care assistance) are better able to stabilize their lives, advance their careers, and raise their children (Mills, Compton, and Golden 2011). In addition, children who experience less time in poverty have higher academic achievement, employment, and lower likelihood of teen childbearing (Ratcliffe 2015).

Many people are eligible for multiple public benefits, and many eligible for public benefits are not receiving them

Accessing public programs can be difficult or confusing. Many eligible families do not receive assistance because of barriers that include lack of information about eligibility and complicated, burdensome, and confusing processes for applying or renewing. In New York in 2014,¹ 86 percent of people eligible for the Supplemental Nutrition Assistance Program (SNAP) received these benefits, and 77 percent of eligible working poor people received SNAP (Cunnyngham 2017). A much higher percentage of eligible children in New York (96 percent in 2015) receive health

¹ Numbers cited are for New York State. We do not have estimates for New York City. Also, all estimates are for the most recent available data year.

coverage through Medicaid or the Children’s Health Insurance Program (CHIP), partly because of outreach efforts, although only 88 percent of eligible parents ages 19 to 64 receive coverage (Kenney et al. 2017).

In addition, many individuals are eligible for multiple public benefit programs. Estimates suggest that nationwide, 85 to 97 percent of people eligible for human service programs—including TANF, SNAP, WIC, LIHEAP, child care subsidies, and housing subsidies—are also eligible for health coverage under the ACA, including through the Medicaid expansion (Dorn et al 2015). In New York, significant numbers of people are eligible for both SNAP and Medicaid/CHIP. In 2013, 1.5 million children and 1.9 million nonelderly adults in New York were eligible for both benefits (Wheaton, Lynch, and Johnson 2016). Unfortunately, we do not have numbers for New York on how many people eligible for multiple programs participate in multiple programs. As part of our WSS study, we found participation in SNAP and Medicaid/CHIP among children and nonelderly adults who were eligible for both benefits was 78 percent in Illinois and 69 percent in North Carolina in 2013 (Loprest, Lynch, and Wheaton 2016). These estimates suggest there is room for increasing program participation.

Many states and localities have successfully increased program benefit participation by using information on current receipt of other public benefits and other forms of program integration

Many states and organizations have put forth considerable effort to increase access to benefit programs through different program integrations, ranging from changes to policy to technology to administrative procedures (Dorn 2015; Hahn 2016). And, many states have taken advantage of the opportunities for integration provided through the ACA . Some of the most successful efforts use information from recipients of one program to determine eligibility or renewal for another program. These efforts include Express Lane Eligibility in Louisiana and South Carolina, which uses information on SNAP determination to automatically enroll children in Medicaid. Louisiana and South Carolina also use SNAP receipt information to automatically renew that coverage, saving \$1 million and \$1.6 million in administrative costs for manual renewals (Dorn 2015). Many states coordinate SNAP and Medicaid renewals by using available program data. Another example is the Combined Application Projects (CAP) which used information in Supplemental Security income (SSI) program applications to determine SNAP eligibility for seniors and those with disabilities. This program has shown some success. From 2000 to 2008, CAP states experienced a 48 percent increase in SNAP participation levels among one-person SSI households while such households’ enrollment in other states saw little change (Dorn 2015).

Providing information and reducing the burden of application can increase access

Many states have tried to increase take-up of benefits by providing information about other public benefits to those applying to or seeking information about a program. For example, most states have some form of online eligibility screener that helps users assess potential eligibility for public benefit programs, and it sometimes assesses eligibility for multiple programs. Some of these screening tools connect potentially eligible individuals to information on how to apply or, in some cases, allow for online application. There is little evidence about whether these efforts increase eventual benefit application or receipt. Efforts that involve providing in-person application assistance have shown some success in increasing participation. One example is an experiment where H&R Block tax preparers helped complete and submit SNAP applications for low-income clients. In this case, 80 percent more applications were filed than among a control group that only received SNAP information and a blank application

(Whitmore Schanzenbach 2009). However, when the providers filled out the application and gave it to clients with information on how to file, there was no significant increase in applications filed relative to the control group. A growing body of research in behavioral economics has shown that small changes can make it easier for people to act and make decisions that support their goals. The Behavioral Interventions to Advance Self-Sufficiency (BIAS) project, launched in 2010, showed that making small changes in human services programs, such as providing clearer notices, reducing steps in processes and personalizing outreach had positive impacts on outcomes such as benefit receipt (Richburg-Hayes et al. 2017). While none of these changes are exactly the same as proposed here, they provide some evidence that a smaller change could potentially impact benefit receipt.

Every effort to reduce the burden of applying for benefits has the potential to increase applications. The proposal in front of the Council could reduce application burden and increase access to public benefits in the following ways:

1. It informs those applying for or receiving public assistance about other programs for which the department has determined they may be eligible. This is more than just information about programs, it is information from an official source (the agency responsible for administering the benefits) that they may be eligible.
2. It provides information on how to apply and applications.
3. It mandates pre-filling relevant information from other programs into the application.

Evidence such as the H&R Block experiment suggests there is a continuum of impact on increased applications related to how much an intervention reduces burden for applicants. Automatic benefit determination using existing program eligibility is one end of the spectrum. This proposal provides information and some reduction in burden to applicants and recipients of public benefits. Whether it is worthwhile largely depends on the cost to implement for the department relative to the eventual increase in benefit access. One possibility is to first implement the proposal in programs with the largest numbers of eligible nonparticipants or to target population groups within programs that have higher rates of nonparticipation (such as working parents for SNAP or nonelderly nonparents for Medicaid). If the council decides to move forward with the proposal, it is important to track the applications made by individuals receiving this information to assess the level of impact.

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**Testimony by Liz Accles
Executive Director, Community Food Advocates**

On Int. 855-A in relation to notification of public assistance eligibility

June 27, 2017

As Executive Director of Community Food Advocates (CFA), I submit this testimony in support of Int. 855-A relating to notification of public assistance eligibility. This bill's intent to increase and streamline access to public assistance programs by taking advantage of technological advances is an important step, particularly considering the extraordinarily high cost of living in New York City and the vast number of individuals and families who live in poverty. For these residents, this bill would provide increased access to much needed support and a more comprehensive and cohesive safety net.

Community Food Advocates supports Int. 855-A; however, we have some concerns regarding specific aspects of the bill and recommend that it be strengthened to provide protections that will minimize unintended negative consequences relating to confidentiality and accuracy of applicant/recipient information. Firstly, the provision allowing for pre-filled applications with information from prior applications could potentially compromise the confidential information of recipients. This pre-filled information, which would be shared electronically via a link or through traditional mail, could possibly be accessed by persons other than the recipient unless careful privacy measures are put in place. Secondly, protections must be built into the bill to prevent the use of outdated information that could run the risk of false

disclosures. In the event a recipient's income has decreased, indicating that the applicant should receive increased benefits, this changed status and increased financial need would not be reflected within the pre-filled information. Alternatively, a recipient whose income has increased would not have this information reflected in the pre-filled information, and the recipient could be unwittingly charged with an intentional program violation in the event they participate in a government assistance program. Thirdly, while paragraphs (c) and (d) lay out reporting requirements, further guidelines could be included that detail what steps the agency should take to meaningfully address the reported information.

Finally, although this policy proposes to draw upon technological tools that could help streamline and increase efficiency in accessing benefits, it is important for the City to continue providing adequate staffing, and not rely on technology at the expense of human staffing. There are simply some cases where technology is ill-equipped to address problems that have the potential to cut recipients off from much needed assistance, and staffing is necessary to ensure this does not happen. With this consideration, along with the other considerations mentioned in this testimony, we believe that Int. 855-A could help maximize government assistance participation for the City's low-income residents, and we support this bill.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 855 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Towah Komuro

Address: One Penn Plaza

I represent: ELF

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 6/27/17

(PLEASE PRINT)

Name: Andree Monnier

Address: _____

I represent: NYU Family Health Centers

Address: 150 55th St, Brooklyn NY 11220

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1461 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Kelly Grace Rice

Address: 534 W 137th St - #1461

I represent: Jails Action Coalition

Address: 40 Rector St. NY NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. 855A

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: John Robertson

Address: 103 Pilling St Bklyn 11207

I represent: Columbia University

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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in favor in opposition

Date: 6/27/17

(PLEASE PRINT)

Name: Madeline Crawford

Address: Ridge, NY

I represent: accompanied by Safety Net Advocate

Address: 40 Rector St. (Urban Justice)

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Commissioner Steve Banks, DSS

Address: _____

I represent: _____

Address: _____

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THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 855 Res. No. _____
 in favor in opposition

Date: 6/27/17

(PLEASE PRINT)

Name: Yvonne Peña

Address: _____

I represent: Community Service Society

Address: 633 3rd Ave, New York, NY 10017

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 6/27/2017

(PLEASE PRINT)

Name: Mercedes Jennings

Address: 100 Pennsylvania Avenue, 3rd Floor

I represent: Partnership for the Homeless

Address: 100 Pennsylvania Avenue

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 1597/1642 Res. No. _____
 in favor in opposition

Date: 6/27/17

(PLEASE PRINT)

Name: Raysa Rodriguez

Address: _____

I represent: Win (Women in need)

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. 0855
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Matt Bishop

Address: 25-15 Crescent St, Astoria, NY 1102

I represent: Open City Labs

Address: _____

Please complete this card and return to the Sergeant-at-Arms
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THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 0855-205 Res. No. 3
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Emily Maran

Address: _____

I represent: Single Stop

Address: 123 William St, Suite 901

Please complete this card and return to the Sergeant-at-Arms
**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

LINC
Homeless 55

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Catherine Trapani

Address: _____

I represent: Homeless Services United

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

1635
1461

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: JONATHAN SUNSHINE POOLE

Address: 836 CROWN STREET

I represent: URBAN JUSTICE CENTER SAFETY NET ADVOCATES

Address: 40 PECTY STREET

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

0855

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 6/27/17

(PLEASE PRINT)

Name: Andree Monnier

Address: _____

I represent: Family Health Centers @ NYU

Address: 150 55th St, BKlyn, NY 11220 Langone

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 855-A Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Beth Morrow

Address: 448 7th Street Brooklyn NY 11215

I represent: The Children's Partnership

Address: Los Angeles, CA 90017

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 16146/1577 Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Brenda Riley

Address: 150 Linden St

I represent: Urban Justice

Address: 40 Rector

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THE CITY OF NEW YORK

Appearance Card

855-A

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 6/21/17

(PLEASE PRINT)

Name: ALEXANDRA BRANDES

Address: 331 E 70TH ST NY, NY 10021

I represent: LENOX HILL NEIGHBORHOOD HOUSE

Address: 331 E 70TH ST NY, NY 10021

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 1635 Res. No. _____
 in favor in opposition

Date: June 27, 2017

(PLEASE PRINT)

Name: Brenda Riley

Address: 150 Linden St.

I represent: Urban Justice

Address: 40 Rector St.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Giselle Rouche & Kathryn Cliff

Address: _____

I represent: Coalition for the Homeless

Address: Legal Aid Society

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. ⁰⁸⁵⁵⁻¹⁵⁹⁷ 1642 Res. No. _____
 in favor in opposition

Date: 6/27/17

(PLEASE PRINT)

Name: Wendy O'Shields

Address: _____

I represent: Urban Justice Safety Net Activist
And Homeless Rights Advocate

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 855 Res. No. _____
 in favor in opposition

Date: 6/27/2017

(PLEASE PRINT)

Name: Alexandra Braganza

Address: 371 Plaza 734 West Village Brooklyn

I represent: Let's Hang Out For America Home

Address: 350 Broadway Street NY, NY 10021

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

1597, 1642

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Stephane Gendell

Address: _____

I represent: Citizens' Committee for Children

Address: _____

Please complete this card and return to the **THE COUNCIL** *Sergeant-at-Arms*
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 1642 Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Sarah Wilson

Address: 225 E 45th St NY NY 10017

I represent: Safety Net

Address: 40 rector St 9th Fl.

Please complete this card and return to the **THE COUNCIL** *Sergeant-at-Arms*
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 855-A Res. No. _____
 in favor in opposition

Date: 8/27/17

(PLEASE PRINT)

Name: Chris Widelo

Address: 750 3rd Ave 3rd Fl

I represent: AARP

Address: SAME

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 855 Res. No. _____

in favor in opposition

Date: 27 JUNE 2017

(PLEASE PRINT)

Name: ELANA DUFFY

Address: 203 E 27 ST APT 3 NY NY 10016

I represent: PATIFINDER LABS + NYC VETERAN ALLIANCE

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 6/27/17

(PLEASE PRINT)

Name: Rob Rodevich

Address: _____

I represent: Intuit

Address: 6535 Torrey Santa Fe, San Diego CA

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 855 Res. No. _____

in favor in opposition

Date: 6/27/17

(PLEASE PRINT)

Name: Olivia Meier

Address: 1704 E 15 St. Apt DS Brooklyn, NY

I represent: NYC Veterans Alliance

Address: PO Box 532 New York, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 6/27/17

Name: Kathryn Kliff (PLEASE PRINT)

Address: 199 Water St.

I represent: The Legal Aid Society (joint with Carbone - Eselle)

Address: 199 Water St.

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

Name: LEWITIA MOORE (PLEASE PRINT)

Address: _____

I represent: SAFETY NET

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 855-A Res. No. _____

in favor in opposition

Date: 6/27/17

(PLEASE PRINT)

Name: Beth Novick

Address: NYU / The Gov Lab

I represent: 14 WASHINGTON PL

Address: NY, NY

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. A 855 Res. No. _____

in favor in opposition

Date: 6/27/17

(PLEASE PRINT)

Name: Liz Accles

Address: 110 Wall St

I represent: Community Food Advocates

Address: _____

Please complete this card and return to the Sergeant-at-Arms