

Testimony from NYCHA's Chief Executive Officer Lisa Bova-Hiatt
Preliminary Budget Hearing – Public Housing
Committee on Public Housing
Tuesday, March 24, 2026 – 10:30 a.m.
250 Broadway, 8th Floor, Hearing Room 1

Chair Chris Banks, members of the Committee on Public Housing, other distinguished members of the City Council, NYCHA residents, community advocates, and members of the public: good morning. I am Lisa Bova-Hiatt, NYCHA's Chief Executive Officer. I am pleased to be joined by Chief Operating Officer Eva Trimble, Executive Vice President of Finance and Chief Financial Officer Annika Lescott-Martinez, Chief Asset and Capital Management Officer Shaan Mavani, and other members of NYCHA's leadership team. Thank you for this opportunity to present the Authority's adopted budget, which was approved by NYCHA's Board of Directors in November. I am also pleased to update you on the strides we're making to improve residents' quality of life while transforming and strengthening our organization.

Despite a rent revenue deficit of nearly half a billion dollars, and the cumulative impacts of decades of federal government underfunding, I am pleased to report that we anticipate a balanced budget by year end – with \$5.6 billion in expected expenses matching our total anticipated funding of \$5.6 billion. We achieved this balanced budget through a variety of cost-saving measures. And in 2026, we are investing approximately \$3.6 billion across the city to improve residents' homes, for today and for the decades to come.

For nearly a century, NYCHA has been providing truly affordable housing to low- and moderate-income New Yorkers – a platform for stability and opportunity which strengthens the city as a whole. Today, through our 2,400 buildings, and our Section 8 and PACT programs, NYCHA is home to more than half a million people – or one in 16 New Yorkers – whom we also support with connections to life-changing economic opportunities, social services, and health resources.

We are pursuing Mayor Mamdani's charge to bring an all-hands-on-deck approach, and to use every available strategy, to address NYCHA's challenges and ensure that the Authority remains a vital resource of affordable housing in our city for another century and beyond. Mayor Mamdani has been clear that NYCHA will be at the forefront of the administration's forthcoming housing plan, and we welcome that focus and investment. We have been meeting regularly with Deputy Mayor Bozorg, both while crafting the preliminary budget and during the development of the housing plan, to share the challenges and the opportunities we foresee ahead. And we greatly

appreciate the increased City funding that will support our PACT and Trust housing preservation efforts.

Progress in Critical Areas

We are especially focused on making improvements in the areas that matter most to residents and which are under the purview of our HUD Agreement. We are making real progress, as demonstrated by our HUD apartment inspection scores, which keep improving.

We continue to improve elevator operations by hiring and training additional elevator mechanic teams while investing in equipment that will improve service. Last year, we resolved 90 percent of elevator outages within 10 hours, exceeding the HUD Agreement's 85 percent threshold.

During the last heat season, we resolved heat outages in an average of 6.8 hours – well below the 12-hour HUD Agreement target – and all the outages were resolved within 24 hours.

As of March 1, we have tested nearly 140,000 apartments for lead and have abated lead in more than 18,000 public housing apartments, providing families with a safe home and peace of mind. Our PACT partners have abated an additional 4,400 apartments.

Our success in tackling mold is measured by fewer occurrences, fewer reoccurrences, and improved response times. There are about 20 percent less new mold complaints since 2022, and the reoccurrence rate dropped from 30 percent to 10 percent from 2019 to today. We're now responding to mold complaints in an average of two days, down from 25 days. And resident satisfaction concerning our mold work has risen from 71 percent to 84 percent.

We have also made progress in reducing the number of pest extermination work orders – from nearly 17,000 open work orders in January 2023, which would take months to get to, down to a workload of 7,000 work orders open at any given time, which allows us to address work orders in an average of five days. An improved pest management approach is a key reason for the reduction. We are responding to rat complaints in an average of approximately one day, and within about four days for other pests, exceeding the HUD Agreement targets.

Balancing the Budget While Navigating Significant Fiscal Challenges

Our budget is a vital roadmap for responsibly and transparently planning our operations and our capital investments – as well as how the Authority will continue to support residents over the long term, despite the numerous and significant challenges we continue to face. I'd like to thank CFO Lescott-Martinez and the entire Finance Department for their hard work and dedication, which has enabled us to balance our budget again this year. Continuing to improve the quality and reliability of the services we provide to residents, investing in our buildings, and ensuring NYCHA families have a home they can be proud of remain the focus of our efforts, and our wholehearted commitment.

Massive rent arrears remain one of the challenges we must navigate. Constituting a significant portion of our operating budget, rent payments are essential for providing residents with the quality of life they deserve. Thanks in part to \$300 million from the ERAP, CRA, and HOME-ARP rental assistance programs – which have assisted nearly 80,000 households – we have made some progress in bringing down the arrears. However, we are currently collecting only about 84 percent of the rent charged each month, and a significant number of households still have COVID-era arrears. Total arrears currently stand at about \$475 million across approximately 64,000 households as of the end of January. Since the COVID-related rental assistance programs are no longer accepting new applicants, we are letting residents know both the importance of paying rent as well as how they can get support to address their arrears, including through payment plans and rent adjustments to account for any reduction in income.

At the same time, federal funding is not keeping pace with the ever-increasing costs of repairing and maintaining our decades-old buildings, which cumulatively suffer from about \$80 billion in capital needs. There is also uncertainty about the level of federal funding we will receive – Congress passed an appropriations bill for 2026 that decreases operating funding for the nation's public housing authorities by 14 percent. This could mean NYCHA would need to reduce its operating spending by up to \$100 million if we do not receive competitive shortfall funding, which we historically have not. Funding cuts may require us to make difficult choices to keep our budget balanced, although we will always prioritize residents' health and safety as well as essential services. And, with our partners, we will continue to advocate for the federal funding that public housing desperately needs.

We have demonstrated an ability to adapt to insufficient federal funding – as I noted, we have balanced our budget for 2026, which is a significant achievement and follows a balanced budget in previous years despite considerable uncertainty regarding our federal funding. However, with the gap widening between NYCHA’s needs and the federal funding NYCHA receives, we anticipate substantial deficits in the coming years – which we will address through cost-saving measures. We have maintained balanced budgets with prior funding gaps through aggressive cost savings – by reducing central office department budgets by about \$100 million and constraining the non-emergency overtime budget, for instance. We will continue this important work to ensure we are using our limited resources as effectively as possible, though future cuts which do not impact agency operations and modernization plans will be increasingly harder to identify.

Federal funding comprises two-thirds of NYCHA’s operating revenue. This year, we expect to receive about \$1.3 billion in federal operating subsidy. Rent revenue accounts for the other third of our operating revenue, and we expect to collect about \$858 million in rent revenue this year, which is well over a hundred million dollars less than we should be collecting. HUD has obligated our operating funding for 2026 at an 86 percent proration rate through May – proration is the allocation of a fraction of the eligible funding, and so this is \$200 million less than what NYCHA is eligible to receive if this proration continues for the rest of the year.

Additionally, we anticipate receiving \$337 million in City expense funds for Calendar Year 2026. We appreciate the City’s critical support – even amidst a challenging City budget period – which demonstrates the City’s continued recognition of NYCHA’s vital role in serving New Yorkers.

We expect to receive about \$2.1 billion this year for Section 8 vouchers. If Congress enacts the House’s proposed funding for Section 8 renewals, that will lead to a 99 percent proration rate and create a \$108 million shortfall for NYCHA. We expect that HUD will announce the funding renewal rate within the next few months. In the meantime, we are assessing ways to ensure that any shortfall does not impact the families we serve, and we will apply for additional HUD funding.

Our expected expenses for 2026 are approximately \$2.3 billion in Section 8 payments to landlords; \$1.9 billion in salaries, fringe benefits, and overtime; \$344 million in contracts; \$682

million in utility payments; and \$413 million for expenses such as leases, supplies, vehicles, and equipment.

CFO Lescott-Martinez will now provide some additional information about NYCHA's 2026 budget and fiscal outlook.

Budget Presentation from CFO Annika Lescott-Martinez

Investing in Our Buildings

Thank you, Annika. I would now like to discuss our capital investment program. In 2026, about \$3.6 billion is available for capital investments in our properties, including approximately \$731 million in expected 2026 federal capital funding; \$1.3 billion in City capital funding available in the 2026 City Fiscal Year; and other federal, State, and City funds allocated from prior-year awards. We are grateful for the City's support, which funded a range of projects that benefit residents, including heating system upgrades, roof replacements, waste infrastructure improvements, and investments in community centers, playgrounds, sport courts, and security cameras and lights. We are also grateful for the State's commitment of more than half a billion dollars currently available for heating, elevators, and facades.

While the federal capital funding we receive meets only a tiny fraction of the \$80 billion in needs, organizational transformation efforts are enabling us to accelerate critical renovations and accomplish complex and innovative modernizations – to the benefit of residents and their quality of life. In fact, we are completing more capital work annually than at any point in the Authority's recent history: from 2021 through 2025, we invested over \$5.1 billion in capital improvements across our portfolio, completing 810 construction projects and steadily increasing expenditures to \$1.25 billion in 2025. For residents, and in support of our HUD Agreement targets, this has meant the renovation of 177 heating systems; the replacement of 277 elevators, 757 waste and pest management assets, and 744 roofs; the repair of 217 building facades (and removal of sidewalk sheds at 314 buildings); the installation of over 3,700 CCTV cameras and 3,100 exterior lights; upgrades of over 3,300 apartments and 25 community centers; 68 new or improved playgrounds and sports courts; and strengthened resiliency to storm surge and cloudburst flooding at 30 properties.

This work has also created the equivalent of over 620 full-time jobs for low-income New Yorkers, including NYCHA residents.

As part of fundamentally redesigning the way we deliver capital projects, we continue to focus on improving customer service and transparency, with tools such as our Capital Projects and Needs Tracker (and other publicly available guidance and information) as well as regular communication with residents and other stakeholders about the projects in their communities. For instance, we conduct nearly 600 quarterly stakeholder meetings with NYCHA property management and resident leadership each year via dedicated Property Liaison teams, in addition to over 5,000 project-specific stakeholder engagement touchpoints. In addition to providing residents with key information in a range of formats and languages, we are also soliciting feedback from residents via surveys at multiple points on every project.

Currently, 506 projects are in planning or underway across the city, representing \$6.3 billion in investments. This includes renovation of additional heating systems, elevators, roofs, facades, waste management infrastructure, and community centers. NYCHA is also scaling up deployment of energy-efficient window heat pumps for heating and cooling, as well as large-scale waste plumbing, kitchen, and bathroom rehabilitation to target the root causes of leaks and mold.

Creative and Transformative Housing Preservation Tools

The federal government has been underfunding public housing for decades, and so we must use every tool at our disposal to bring our buildings the investments they desperately need, and our residents the quality of life they deserve. Our major housing preservation programs like PACT, the Public Housing Preservation Trust, and Comprehensive Modernization (Comp Mod) are leveraging new and creative models for funding, project delivery, and partnership, bringing billions of dollars to revitalize our developments, and residents' homes, from top to bottom – all while maintaining the rights and protections and integrity of our city's public housing.

More than 44,000 apartments across 169 developments are in pre-development, under construction, or have completed renovation through PACT, representing over \$16 billion in capital repairs and upgrades. We are on track to bring comprehensive repairs and upgrades, along with enhanced property management and social services, to a total of more than 142,000

residents through PACT. We are also bringing an unprecedented level of transparency and insight into our work, with online dashboards that anyone can use to monitor our progress with PACT projects (as well as our regular capital projects).

The NYC Public Housing Preservation Trust will also dramatically improve the quality of life for residents. To date, four developments have voted to join the Trust to unlock funding for much-needed renovations of their homes. Last year, the Trust signed design-build contracts for projects to modernize nearly 1,400 homes at Nostrand Houses and Bronx River Addition, representing almost half a billion dollars in building upgrades.

Developed in collaboration with residents, both the Trust and PACT bring developments the more stable Section 8 federal funding, which is worth nearly double what Section 9 apartments receive. These initiatives also ensure that NYCHA developments remain public and that residents maintain their rights and protections, including permanently affordable rent.

The Comp Mod program will also complete holistic capital improvements instead of simply repairing individual building components. Comp Mod projects are active or planned at seven developments currently, where they will transform residents' homes thanks to nearly \$1.2 billion in funding.

Looking Ahead While Becoming a Better Landlord Today

NYCHA is an integral and indispensable part of New York City, providing a stable and truly affordable home – a platform for opportunity – for hundreds of thousands of families. The work we are doing is not only about using every tool at our avail to improve residents' lives today, but also about ensuring that NYCHA remains a vital resource for the generations to come. We truly appreciate your partnership as we overcome the obstacles and continue to make progress for the New Yorkers we serve.

Thank you. We are happy to answer any questions you may have.

(\$ in millions)

	<u>2026</u>
Sources	
Tenant Rental Revenue	\$858
Operating Subsidy	\$1,270
Section 8 Program Subsidy	\$2,581
Capital Transfer/Mgmt. Fee	\$256
City Funds	\$337
All Other	\$267
Total Sources	\$5,569
Uses	
Personal Services (PS)	
Salaries	\$955
Overtime	\$180
Fringe	\$718
Total PS	\$1,853
Other than Personal Services (OTPS)	
Supplies	\$129
Utilities	\$682
Contracts	\$344
Section 8 Landlord Payments	\$2,276
All Other OTPS	\$284
Total OTPS	\$3,716
Total Uses (PS & OTPS)	\$5,569
Surplus/(Deficit)	\$0

2026 Operating Sources and Uses

Sources

- The adopted budget estimates \$858 million in tenant rent revenue, and 88% collection rate on new charges.
- \$1.3 billion in federal operating subsidy to support 145,942 eligible public housing units.
- Due to continued PACT and Trust conversions, we expect growth in the Section 8 program revenue with \$2.6 billion in Housing Assistant Payments (HAP) and admin fee.

Uses

- \$1.9 billion in personnel expenditures provides salaries and fringe for 11,865 full-time staff.
- \$180 million overtime budget, representing the continued implementation of control measures.
- \$2.3 billion in corresponding Section 8 HAP landlord payments.
- **We are anticipating a balanced budget at year-end.**

2026-2030 Operating Plan

While we anticipate a balanced budget in 2026, significant deficits are anticipated in the outyears. NYCHA will implement additional cost savings to mitigate the potential deficits in 2027 and beyond.



	2026	2027	2028	2029	2030
Sources					
Tenant Rental Revenue	\$858	\$838	\$840	\$843	\$846
Operating Subsidy	\$1,270	\$1,381	\$1,387	\$1,349	\$1,402
Section 8 Program Subsidy	\$2,581	\$2,589	\$2,666	\$2,729	\$2,798
Capital Transfer/Mgmt. Fee	\$256	\$256	\$256	\$256	\$256
City Funds	\$337	\$358	\$368	\$370	\$370
All Other	\$267	\$80	\$90	\$68	\$64
Total Sources	\$5,569	\$5,502	\$5,606	\$5,614	\$5,736
Uses					
Personal Services (PS)					
Salaries	\$955	\$953	\$951	\$951	\$951
Overtime	\$180	\$178	\$178	\$178	\$178
Fringe	\$718	\$758	\$758	\$758	\$758
Total PS	\$1,853	\$1,889	\$1,887	\$1,887	\$1,887
Other than Personal Services (OTPS)					
Supplies	\$129	\$130	\$129	\$129	\$129
Utilities	\$682	\$682	\$682	\$682	\$682
Contracts	\$344	\$351	\$349	\$349	\$349
Section 8 Landlord Payments	\$2,276	\$2,425	\$2,482	\$2,543	\$2,604
All Other OTPS	\$284	\$288	\$288	\$289	\$290
Total OTPS	\$3,716	\$3,876	\$3,931	\$3,992	\$4,055
Total Uses (PS & OTPS)	\$5,569	\$5,766	\$5,818	\$5,879	\$5,941
Surplus/(Deficit)	\$0	(\$263)	(\$212)	(\$265)	(\$206)

(\$ in millions)



Five-Year Capital Plan: Sources and Uses

- The five-year plan addresses \$7.8 billion of NYCHA's capital investment needs including the estimated \$80 billion in physical needs at NYCHA properties. \$3.6 billion is available in 2026.
- **Federal Capital:** \$4.3 billion, including \$670 million, in unspent funding and estimated new annual grant of \$731 million in 2026-2030.
- **City Capital:** \$1.5 billion of funding in support of HUD/SDNY Agreement compliance and an additional \$1.0 billion of Mayoral funds.
- **State Capital:** \$528 million for boiler, elevator, and brickwork improvements; with an additional \$26.5 million for other activities.

Sources	2026*	2027	2028	2029	2030	Total 2026-2030
Federal Public Housing Capital	\$1,401	\$731	\$731	\$731	\$731	\$4,327
City Capital	\$1,302	\$684	\$180	\$215	\$218	\$2,600
State Capital	\$555	\$0	\$0	\$0	\$0	\$555
Federal Disaster Recovery	\$249	\$0	\$0	\$0	\$0	\$249
Community Development Block Grant (via City)	\$7	\$0	\$0	\$0	\$0	\$7
Competitive Grants	\$3	\$0	\$0	\$0	\$0	\$3
Other	\$46	\$0	\$0	\$0	\$0	\$46
Total Sources	\$3,564	\$1,415	\$911	\$947	\$949	\$7,786
Asset & Capital Management	\$2,628	\$822	\$365	\$496	\$497	\$4,807
Healthy Homes	\$381	\$228	\$181	\$85	\$87	\$962
Operations (excl. Healthy Homes)	\$92	\$22	\$22	\$22	\$22	\$180
Information Technology	\$53	\$22	\$22	\$22	\$22	\$139
NYCHA-Wide	\$409	\$322	\$322	\$322	\$322	\$1,699
Total Uses	\$3,564	\$1,415	\$911	\$947	\$949	\$7,786

* 2026 Capital Funds includes \$1.7 billion in unspent funds from prior years that will roll.

(\$ in millions)



Questions



NYSFAH Testimony
New York City Council Committee on Public Housing
FY2027 Preliminary Budget Hearing
Submitted: March 25, 2026

To the Honorable Members of the Committee on Public Housing:

The New York State Association for Affordable Housing (NYSFAH) represents nonprofit and for-profit developers, owners, and managers who create and preserve affordable housing across the five boroughs. We submit this testimony regarding the FY2027 preliminary budget as it relates to the New York City Housing Authority.

We are encouraged by the direction Mayor Mamdani has set for NYCHA. The new administration has made clear that public housing will be a central component of the forthcoming housing plan, and we are already seeing early investments that reflect that commitment. The expansion of RAD, PACT, and the NYCHA Trust under this administration is unlocking the capital needed to rehabilitate aging buildings and improve living conditions for residents. PACT alone has now delivered over \$16 billion in repairs across more than 44,000 apartments, and the Trust is bringing nearly \$500 million to nearly 1,400 homes, results that demonstrate what can happen when city leadership prioritizes preservation.

We also recognize the City Council's longstanding partnership and advocacy on behalf of NYCHA residents. The Council has consistently pushed for greater investment and accountability, and its continued oversight helps ensure that public housing remains a priority. We appreciate the Council's role in championing the resources that have made these preservation efforts possible.

We further welcome Mayor Mamdani's focus on the vacancy crisis at NYCHA. Currently, approximately 6,100 apartments sit vacant, a 20 percent increase from two years ago, taking an average of 350 days to return to service. This has persisted despite more than \$247 million in prior investments. We urge the Council to support additional emergency capital funding in the final budget to accelerate the repair of vacant units and get them back into service.

The work of preserving public housing is not easy, and the early investments proposed in the preliminary budget reflect a promising start under Mayor Mamdani's leadership. We look forward to continuing to work with the Council and the new administration to ensure NYCHA has the resources it needs to serve its residents and the city.

Respectfully submitted,

Irak Cehonski-Rivas
NYC Policy Director
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CITY-WIDE COUNCIL OF PRESIDENTS, INC.

The Official Representative Body for the Public Housing Community
Of Resident Associations in the City of New York



March 24, 2026

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STATEMENT TO:

THE NEW YORK CITY COUNCIL PUBLIC HOUSING COMMITTEE
RE: **Federal Cuts to NYCHA & Need for Dedicated City Budget**
Line Item

Good afternoon,

Chairman Banks and Members of the Committee

ON BEHALF OF, The Citywide Council of Presidents (CCOP)

My name is REGINALD BOWMAN, and I serve as the Business Manager for the Citywide Council of Presidents, representing more than 500,000 NYCHA residents across 335 developments citywide. Chairman Banks, we appreciate your continued leadership and advocacy for public housing residents, and we come before you today with urgency and a clear call to action.

The recently proposed 14 percent cut in federal funding to NYCHA comes at a time when the Authority is already facing a capital need exceeding \$78 billion, according to NYCHA's 2023 Physical Needs Assessment.

This is not theoretical—this is structural disinvestment.

Indeed, Federal law under the U.S. Housing Act of 1937 (42 U.S.C. § 1437 et seq.) established public housing as a federal responsibility, and regulations such as 24 CFR Part 990 govern operating subsidies meant to sustain developments. Yet, federal appropriations have consistently fallen short of these obligations, leaving NYCHA underfunded by billions over decades.

As a result:

- NYCHA receives less than 90% of its federally authorized operating subsidy in most years
- Critical systems—heat, elevators, plumbing—continue to deteriorate
- Residents endure conditions that, in many cases, fall below the standards outlined in HUD's Housing Quality Standards (24 CFR § 5.703)

Therefore, Chairman Banks, this is where the City must step in—not as a temporary fix, but as a permanent partner.

We the Citywide Council of Presidents, are calling on the New York City Council to establish a dedicated, baseline line item in the City budget for NYCHA—for both operating and capital support.

This request is grounded not only in need, but in precedent and policy authority.

Under the New York City Charter Section 254, the Council has the power to adopt and modify the City's budget to address essential public needs. Housing, particularly for over half a million low-income residents, meets and exceeds that threshold.

Additionally, the City already supplements NYCHA through programs such as:

- The NYCHA Operating Subsidy Support
- The Mayor's Action Plan for Housing

But these are discretionary and inconsistent.

What we want now is codified, guaranteed funding.

A dedicated line item would:

- Stabilize NYCHA against unpredictable federal cuts
- Ensure compliance with federal habitability standards
- Strengthen workforce capacity and response times
- Provide transparency and accountability in funding allocation

Without this, we remain in a reactive posture—managing crisis instead of delivering sustainability.

Chairman Banks, the residents of NYCHA are not invisible, and they are not optional. They are seniors, families, veterans, and essential workers and economic anchor who upheld this city through its most difficult times—from the COVID-19 pandemic to today's affordability crisis.

The question before us is simple:

Will New York City match its values with investment?

We therefore urge this Committee, under your leadership, to take bold legislative and budgetary action to create a permanent NYCHA line item.

Let this be the moment where the City affirms that public housing is not just a federal responsibility—but a New York City priority.

Thank you, Chairman Banks, and we look forward to working with you to get this done.



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Courtney Bryan, Chief Executive Officer

innovatingjustice.org

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 - Richmond County District Attorney
 - Manhattan District Attorney
 - Kings County District Attorney (forthcoming)

The Center for Justice Innovation is a non-profit organization that seeks to transform the policies and practices of the justice system to make it fair, effective, and humane. The Center operates the following sites throughout New York City.

- Family
- Criminal
- Community Development
- Civil/Housing

Click on the name of any program to learn more.

STATEN ISLAND

1. Staten Island Justice Center

MANHATTAN

2. Harlem Community Justice Center
3. Headquarters
4. Manhattan Justice Opportunities
5. Midtown Community Court

MULTI-BOROUGH

6. Legal Hand (Bronx, Brooklyn, Queens)

BRONX

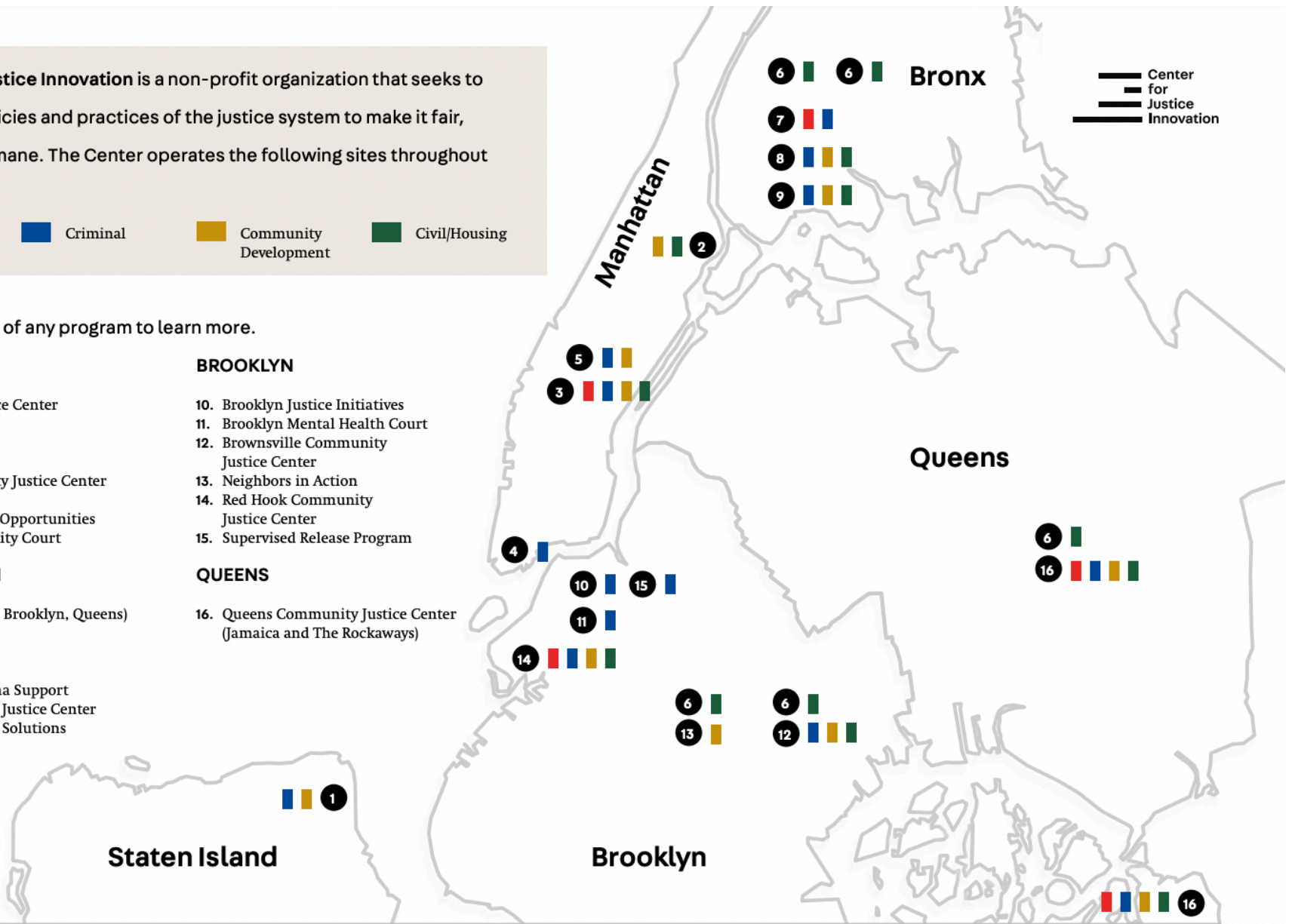
7. Bronx Child Trauma Support
8. Bronx Community Justice Center
9. Bronx Community Solutions

BROOKLYN

10. Brooklyn Justice Initiatives
11. Brooklyn Mental Health Court
12. Brownsville Community Justice Center
13. Neighbors in Action
14. Red Hook Community Justice Center
15. Supervised Release Program

QUEENS

16. Queens Community Justice Center (Jamaica and The Rockaways)



Citywide

- Access to Justice
- Alternatives to Incarceration
- Driver Accountability Program
- Gender and Family Justice
- Neighborhood Safety Initiatives
- Parent Support Program
- Project Reset
- Restorative Justice Practices
- RISE Project
- Strong Starts Court Initiative
- Youth Action Institute
- Youth Impact

For More Information

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Courtney Bryan, Chief Executive Officer

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**Center for Justice Innovation
New York City Council
Committee on Public Housing
March 24, 2026**

Good morning Chair Banks and esteemed members of the Committee on Public Housing. My name is Daren Sealey, and I serve as the Associate Director of the Housing Resource Center at the Red Hook Community Justice Center, an initiative of the Center for Justice Innovation. Thank you for the opportunity to testify today.

As New York City confronts ongoing fiscal pressures, including rising shelter costs and growing demand for housing and social services, it is critical that the City continue investing in strategies that help residents maintain stable housing and avoid displacement. The Fiscal Year 2027 Preliminary Budget underscores the extent to which the City is managing the downstream costs of housing instability—particularly through the shelter system and emergency services. Strengthening upstream interventions that preserve affordability, address housing conditions, and support tenants navigating complex systems is essential to both community stability and long-term fiscal sustainability.

Today, I will highlight several programs that advance these goals and request the Council’s continued support to sustain and expand their impact across public housing communities.

Harlem, Red Hook and Queens Community Justice Center’s Housing Resource Centers

The Center for Justice Innovation operates three Housing Resource Centers that work extensively with tenants in NYCHA to address their housing needs. The Housing Resource Centers located at the Red Hook Community Justice Center, the Harlem Community Justice Center, and Queens Community Justice Center in Far Rockaway, help tenants navigate housing court and address a wide-range of housing issues. In Harlem and Far Rockaway, the Housing Resource Centers include their own community-based housing court part. These Centers help seniors, non-English speakers, and private and public housing tenants obtain critical home repairs, preserve affordability, prevent evictions, and find justice and fair treatment in housing court.

In Red Hook, Harlem and Far Rockaway, the Housing Resource Centers serve a substantial portion of residents living in the nearby NYCHA developments. In 2025, the Centers collectively served thousands of households living in NYCHA, addressing a wide range of housing-related needs. These services included support with Right to Counsel referrals, HRA One-Shot Deal applications, lease recertifications, housing court coordination, and identifying alternative housing to public housing. Through this work, the Housing Resource Centers serve as

a critical access point for tenants navigating complex housing systems and facing housing instability.

A key component of eviction prevention is ensuring affordability. The Housing Resource Centers helps tenants with the annual and interim recertification process and ensure that rent is fairly calculated based on federal guidelines. In 2025, these housing teams helped over 900 NYCHA residents with lease recertifications. For many tenants, errors in their lease recertification process can lead to overcharging, resulting in them having to choose between paying more than they can reasonably afford or facing claims of unpaid rent, accruing debt, and potential eviction. Facilitating the lease recertification process reduces the likelihood of eviction by helping tenants avoid arrears and comply with NYCHA's recertification requirement. Staff supports tenants with lost income to adjust their rent, identify deductions they are eligible for, and connect residents to financial support via the Human Resources Administration's emergency rental assistance and public benefit applications. In 2025, the Harlem team alone assisted 123 residents with HRA applications to maintain their housing and access nutrition assistance.

The Housing Resource Centers also support tenants with home repair issues, including both coordinating repair dates and trades directly with NYCHA and helping tenants file Housing Part (HP) Actions in court. In 2025, Housing Resource Centers helped over 200 residents navigate the process of filing HP Actions in the Justice Centers' housing courts. Tenant-driven court actions allow those facing chronic or unaddressed emergency repair needs to take their landlord to court. Housing Resource Centers screen tenants for issues related to healthy housing, such as mold and lead paint hazards, and maintain close contact with impacted tenants, helping to monitor the status of repairs by conducting home visits to document repair needs and assisting with reasonable accommodation requests for tenants with chronic health conditions and disabilities. The program also helps tenants with non-payment cases raise repair issues as counterclaims in their court proceedings where warranted. Finally, the Housing Resource Centers promote the right to counsel by providing direct referrals to legal services.

Our housing teams also prioritize services for vulnerable populations, including community elders, people with disabilities, and residents facing language barriers. In 2025, 426 older adults visited Harlem's Help Center, with staff providing home visits, assistance with repair requests and reasonable accommodations, and referrals to services such as Meals-on-Wheels and Adult Protective Services. The Housing Resource Centers also help residents access virtual court proceedings, reducing barriers for those with mobility limitations or caregiving responsibilities.

With City Council funding, the Housing Resource Centers will continue their proven model of eviction prevention, housing stabilization, and tenant advocacy. They will expand support to tenants navigating landlord-tenant disputes through Virtual Court Access Network (VCAN) terminals (a partnership in Harlem and Red Hook with the court system that provides remote access to court clerks to respond to eviction proceedings or file affirmative cases for repairs, tenant harassment, or illegal lockouts). Funding will also support staffing efforts to reach traditionally underserved households with language barriers, seniors, and residents with disabilities.

Community Justice Connect

Community Justice Connect works to close the civil justice gap by providing free legal information, resources, and referrals to New Yorkers who do not have access to legal representation. Rather than waiting until a legal crisis reaches the courts, the program trains

community volunteers to proactively help their neighbors understand civil legal issues, navigate forms and processes, and connect to legal services when needed.

Community Justice Connect currently operates out of storefront sites in Crown Heights, the South Bronx, and Jamaica, Queens; but it will soon co-locate within our Community Justice Centers for enhanced accessibility. Last year, Community Justice Connect saw more than 4,200 visits, trained 122 volunteers, and hosted 215 workshops on topics such as housing, public benefits, and consumer protections.¹ Housing issues are among the most common concerns, with volunteers helping residents understand housing court processes, address repairs, and preserve stable housing.

City Council funding will support continued volunteer training and enrichment across all three sites, including legal education, professional development workshops, and career readiness support. These investments will strengthen volunteers' ability to provide high-quality assistance to their communities while also building their own skills and employment opportunities. By expanding access to trusted legal information and community-based support, Community Justice Connect helps New Yorkers resolve problems earlier, strengthens community capacity, and prevents civil legal issues from becoming destabilizing crises.

Neighborhood Safety Initiatives

Neighborhood Safety Initiatives (NSI) supports the implementation of NeighborhoodStat (NSTAT), a resident-driven community organizing initiative and comprehensive strategy to enhance public safety and strengthen community well-being in 30 public housing developments.

NSI enlists residents, City agencies, and community-based partners to help move beyond enforcement and address the factors underlying safety – providing opportunities for work and play, health and well-being, and youth development; promoting activated, well-maintained spaces through community and human-centered design; and improving trust between neighbors with a responsive and just government. Their mission is to improve community safety in places impacted by historic disinvestment by creating opportunities for residents to identify key issues underlying crime and participate in the decision-making to address these priorities. NSTAT harnesses the collective expertise of residents, government, and community partners to drive meaningful dialogue, problem-solving, and, ultimately, create positive change at both the neighborhood and administrative levels.

NeighborhoodStat connects residents to social services and community resources; increases the security and quality of shared community space by working with residents to physically improve and maintain public space, thereby enhancing a positive sense of ownership; increases civic engagement; and enhances the capacity of residents to improve public safety and wellbeing in their communities. Adopting a participatory justice model, NeighborhoodStat works with local organizers to provide direct investment into historically underserved communities and ensures that those most affected and most marginalized, especially those who have been historically left out of these conversations, have a say in improving health and wellbeing, safety and justice, economic stability, physical space, and youth development policies that affect their lives.

¹ Center for Justice Innovation. (2026). Justice Center Application and Reset referral database. [Data file].

Recent annual data shows the program reaches over 50,000 residents of the New York City Housing Authority per year utilizing the following strategies:²

- **Invest in Residents:** Neighborhood Safety Initiatives hires, trains, and supports community organizers; recruits and organizes resident leadership teams; designs and implements social programs; manages community action plans; and implements data collection and evaluations. Social programs include youth mentorship, coding courses, music mentorship, adult entrepreneurship training and support, intergenerational green space stewardship, healing and justice events, summer time basketball series, economic mobility events, and more. Neighborhood Safety Initiatives also respond to residents' immediate needs. The program coordinates collaboration across city agencies and other non-profit partners to answer food needs, connect residents to resources, and host conflict resolution events. In 2024, over 400 intergenerational residents were actively involved in resident stakeholder teams, taking the lead in identifying both the issues plaguing their communities and driving positive change.
- **Transform Public Spaces:** Neighborhood Safety Initiatives works with residents to re-envision public spaces to make them more welcoming and promote people's well-being. In the last five years the program has designed and implemented a series of community gardens and recreational public spaces, wayfinding projects, murals, creative lighting installations, and a pop-up outdoor program with kiosks where partner agencies can provide information and supportive services to the community. Since 2017, Neighborhood Safety Initiatives has overseen the co-creation and implementation of over 65 built environment projects and social programs. These initiatives include murals, open plazas, community gardens, pop-up modular resource hubs, music programs for youth, and adult entrepreneurship programs in collaboration with NYCHA community stakeholders.

Conclusion

The programs outlined today demonstrate that housing stability is not only a matter of individual well-being, but a critical component of the City's broader fiscal and social stability. By helping NYCHA residents navigate lease recertifications, access rental assistance, address unsafe housing conditions, and resolve legal challenges early, these initiatives prevent avoidable evictions and reduce reliance on the City's most costly systems, including shelters and emergency services.

At a time when the City is working to manage significant budget pressures, investments in eviction prevention, legal access, and community-based support offer a practical and cost-effective approach to preserving housing stability for thousands of New Yorkers. Sustained City Council funding will ensure that these programs can continue to reach vulnerable residents, strengthen public housing communities, and reduce the long-term costs associated with housing instability.

² Center for Justice Innovation. *Neighborhood Safety Initiatives*. New York, NY.
<https://www.innovatingjustice.org/programs/neighborhood-safety-initiatives/more-info>

Thank you for the opportunity to testify and for your continued commitment to supporting NYCHA residents and strengthening housing stability across New York City.



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Courtney Bryan, Chief Executive Officer

innovatingjustice.org

Center for Justice Innovation FY27 Proposals

- **#2156900 - Center for Justice Innovation General Funds - \$750,000**

Innovative Criminal Justice Programs (Renewal); Speaker's Initiative

Description: This is an application to support the continuation of the Center for Justice Innovation's innovative criminal justice responses, community-based public safety initiatives, and access to justice programs across all five boroughs in New York City. City Council's support allows us to serve tens of thousands of New Yorkers with mental health services, family development, youth empowerment, workforce development, and housing, legal, and employment resource services. Our goal continues to be improving safety, reducing incarceration, expanding access to community resources, and enhancing public trust in government to make New York City stronger, fairer, and safer for all. With expanded funding, the Center will be able to make deeper investments in housing justice: a key priority area that underpins our efforts at large to build community justice.

Harlem Community Justice Center

- **#2243397 - Harlem Housing Help Center - \$20,000**

Member Item (Renewal)

Description: The Harlem Community Justice Center's Housing Help Center seeks funding from City Council Member Encarnacion and Council Member Salaam to empower tenants of Central and East Harlem to obtain critical home repairs, preserve affordability, prevent evictions, and find justice and fair treatment in housing court.

- **#2239645 - Harlem Housing Help Center - \$50,000**

Community Housing Preservation Strategies (New)

Description: The Harlem Community Justice Center’s Housing Help Center seeks funding from the Community Housing Preservation Strategies Initiative to empower tenants of Central and East Harlem to obtain critical home repairs, preserve affordability, prevent evictions, and find justice and fair treatment in housing court.

Red Hook Community Justice Center

- **#2246731 - RHCJC Housing Resource Center - \$50,000**

Community Safety and Victim Services (Renewal)

Description: The Red Hook Community Justice Center’s Housing Resource Center seeks funding from Council Member Aviles through the Community Safety and Victim Services initiative to help seniors, non-English speakers, and other public housing tenants in the Red Hook Houses obtain critical home repairs, preserve affordability, prevent evictions, and find justice and fair treatment in housing court. Additionally, with funding, the Housing Resource Center will expand support to tenants across District 38 in navigating landlord-tenant disputes through the Virtual Court Access Network (VCAN) terminals, which provide connection to downtown court clerks to respond to eviction proceedings, or file affirmative cases for repairs, tenant harassment, or illegal lockouts.

- **#2246695 - RHCJC Housing Resource Center - \$20,000**

Member Item (New)

Description: The Red Hook Community Justice Center’s Housing Resource Center seeks funding from Council Member Hanif to help seniors, non-English speakers, public housing tenants in the Gowanus & Wyckoff Houses, as well as residents in other types of housing facing housing instability, obtain critical home repairs, preserve affordability, prevent evictions, and find justice and fair treatment in housing court.

Queens Community Justice Center - Far Rockaway

- **#2246307 - Queens Community Justice Center The Rockaways Housing Resource Center - \$20,000**

Member Item (New)

Description: The Queens Community Justice Center-The Rockaways, seeks discretionary funding from City Council to support its Housing Resource Center, which provides services for tenants and families at-risk of eviction and/or experiencing housing

instability to address rent, repair and lease issues, and assist with housing court filings. These housing navigation services meet Far Rockaway tenants where they are, before housing issues escalate, by providing hands-on navigation, eviction prevention, and tenant advocacy in one of the city's fastest rising rent markets.

Community Justice Connect

- **#2197911 - Community Justice Connect Queens - \$20,000**

Member Item (New)

Description: Community Justice Connect (formerly known as Legal Hand) aims to narrow the civil justice gap by offering legal information and resources to Queens residents who do not have access to legal representation, or who are facing civil issues that have not yet escalated into crises that require court intervention. Community Justice Connect uses a model in which volunteers, including students and retired professionals, who primarily reside in Queens, receive in-depth training, resources, and ongoing support from on-site managers, associates, and an attorney. This empowers them to provide their neighbors with free access to legal information and assistance. City Council funding will allow Community Justice Connect to continue and broaden its volunteer enrichment opportunities, providing professional skill development workshops, training sessions, and access to tailored resources to its volunteers, thereby fostering a stronger community justice network.

- **#2243502 - Community Justice Connect Bronx - \$20,000**

Member Item (New)

Description: Community Justice Connect (formerly known as Legal Hand) aims to narrow the civil justice gap by offering legal information and resources to Bronx residents who do not have access to legal representation, or who are facing civil issues that have not yet escalated into crises that require court intervention. Community Justice Connect uses a model in which volunteers, including students and retired professionals, who primarily reside in the South Bronx, receive in-depth training, resources, and ongoing support from on-site managers, associates, and an attorney. This empowers them to provide their neighbors with free access to legal information and assistance. City Council funding will allow Community Justice Connect to implement a Volunteer Enrichment Program at its Bronx site, providing professional skill development workshops, training sessions, and access to tailored resources to its volunteers, thereby fostering a stronger community justice network.

- **#2239906 - Community Justice Connect Crown Heights - \$20,000**

Member Item (New)

Description: Community Justice Connect (formerly known as Legal Hand) aims to narrow the civil justice gap by offering legal information and resources to Crown Heights residents who do not have access to legal representation, or who are facing civil issues that have not yet escalated into crises that require court intervention. Community Justice Connect uses a model in which volunteers, including students and retired professionals, who primarily reside in Crown Heights, receive in-depth training, resources, and ongoing support from on-site managers, associates, and an attorney. This empowers them to provide their neighbors with free access to legal information and assistance. City Council funding will allow Community Justice Connect to continue and broaden its volunteer enrichment opportunities, providing professional skill development workshops, training sessions, and access to tailored resources to its volunteers, thereby fostering a stronger community justice network.

Neighborhood Safety Initiatives

- **#2252522 - Castle Hill Garden - \$25,000**

Member Item (New)

Description: Neighborhood Safety Initiatives (NSI) works to improve public safety and strengthen community well-being in New York City by investing in residents, transforming public spaces, and influencing policy. The key pillars that form the foundation of NSI's work are racial equity, shifting power, increasing access to resources, inclusive design, and deep community participation. NSI provides training to local residents in community organizing, human-centered design, and re-envisioning public spaces to promote people's well-being. With support from NSI and community partners such as GrowNYC and the Bronx Botanical Garden, hundreds of pounds of food were produced each year by the Castle Hill Houses Roxanne Reid Memorial Garden, both feeding the community and providing Castle Hill with a space that could be activated for educational activities and events. The Castle Hill Garden was funded and curated by GrowNYC for its first three years until funding ended. With the help of City Council discretionary funds, NSI aims to bring back the Castle Hill Garden for the benefit of the residents of Castle Hill Houses, a New York City Housing Authority development.

- **#2252732 - NSI Roosevelt Houses - \$25,000**

Member Item (New)

Description: Neighborhood Safety Initiatives (NSI) works to improve public safety and strengthen community well-being in New York City by investing in residents, transforming public spaces, and influencing policy. The key pillars that form the foundation of NSI's work are racial equity, shifting power, increasing access to resources, inclusive design, and deep community participation. NSI provides training to local residents in community organizing, human-centered design, and re-envisioning public spaces to promote people's well-being. With support from the City Council, NSI aims to improve community safety, public health, and community cohesion at Roosevelt Houses with the Roosevelt Houses Basketball Court Project, a renovation project of a 80 x 20 feet dilapidated basketball court located on Dekalb and Stuyvesant Avenues.

- **#2252642 - Morris Houses - \$50,000**

Member Item; NYC Clean Up (New)

Description: Neighborhood Safety Initiatives (NSI) works to improve public safety and strengthen community well-being in New York City by investing in residents, transforming public spaces, and influencing policy. The key pillars that form the foundation of NSI's work are racial equity, shifting power, increasing access to resources, inclusive design, and deep community participation. NSI provides training to local residents in community organizing, human-centered design, and re-envisioning public spaces to promote people's well-being. With support from the City Council, NSI aims to improve community safety, public health, and community cohesion at Morris Houses with the Morris Houses Basketball Court Project, which will turn the dilapidated basketball court into a multipurpose play area for all ages.



DARCEL D. CLARK

THE DISTRICT ATTORNEY
BRONX COUNTY

March 9, 2026

Speaker Julie Menin
New York City Council
City Hall
New York, NY 10007

Dear Speaker Menin and Members of City Council:

On behalf of the Bronx District Attorney's Office, I am pleased to write this letter in support of key Center for Justice Innovation (formerly, Center for Court Innovation) FY27 City Council Applications. Funding will expand:

- pre-arraignment early diversion options;
- mental health supports;
- restorative justice programming;
- human trafficking survivor leadership initiatives at the intersection of intimate partner violence and gun violence; and
- innovative pilot programs that address pressing needs in communities within the Bronx.

These programs will enable the Bronx to move towards our shared vision of reducing unnecessary and harmful involvement in the legal system wherever possible and allow us to build public safety through sustainable community-driven solutions.

For the past several years, the City Council has supported the Bronx with **\$710,000** to invest in early system diversion, which includes **Project Reset**, the Center's citywide pre-arraignment diversion model and same day at arraignments programming that re-directs New Yorkers with misdemeanor arrests from the court system. Project Reset Bronx includes borough-wide restorative justice circles to aid in diversion. This has offered relief from the collateral consequence's participants might otherwise experience if arraigned for low-level crimes. We support the Center in continuing to partner with the Council to implement the next generation of early system diversions for the Bronx to continue to lead the City in scaled restorative justice-based interventions. In 2025, Bronx Assist was launched, a promising pre-arraignment diversion program for certain Desk Appearance Ticket (DAT) arrests which is being piloted in the 44th Precinct with support from a two-year federal grant. CJI has demonstrated a willingness to partner on this project and has shown a willingness to see it succeed.

Thanks to meaningful changes in the treatment of trafficking victims in the justice system, the Center's **Bronx Human Trafficking Intervention Court (HTIC)** referrals continue to decline. **Project Healing and Empowerment through Advocacy and Leadership** (Project

HEAL) is a survivor leadership and peer support initiative for human trafficking survivors. Additionally, we support the Center's RISE Project which is used in Family Court and provides community-based intimate partner violence prevention services in communities most impacted by gun violence.

Since 2010, **Bronx Community Solutions (BCS)** has assisted all individuals ordered by court mandate to complete a screening and assessment, DWI treatment, and enrollment in the **Driver Accountability Program**. This initiative began at the request of the judiciary, who noted that participants were having difficulty navigating the complicated network of private providers of these statutorily mandated services.

Finally, we support continuation of the Center's **Innovative Core Funding** which addresses the immediate needs of all borough residents by piloting novel and effective approaches to anti-gun violence, victim services, and mental health services with diversion.

The Center has a long and documented history of conducting original research and operating direct service programs in the Bronx. Their mission to promote equality, dignity, and respect in communities aligns with my Office's vision. Together we can reimagine a fairer and more holistic approach to justice. We can do this by reducing incarceration as well as by building substantial and meaningful community-based support. I encourage the City Council to consider funding each of the Center's programs which will ultimately enhance fairness, accountability, and safety for the people of the Bronx.

Sincerely,



Darcel Clark



OFFICE OF THE DISTRICT ATTORNEY
RICHMOND COUNTY

MICHAEL E. McMAHON
DISTRICT ATTORNEY

March 3, 2026

Speaker Julie Menin
New York City Council
City Hall
New York, New York 10007

Re: Support for Center for Justice Innovation Fiscal Year 2027 Initiatives

Dear Speaker Menin and Members of the New York City Council:

I am pleased to offer my strong support for the Center for Justice Innovation's Fiscal Year 2027 funding request to expand alternatives to incarceration, provide enhanced mental health supports, develop early diversion programming at the intersection of intimate partner violence and gun violence, strengthen restorative reentry options for individuals and their families, expand pre-court eviction prevention initiatives, and pilot innovative programs that address pressing community needs across New York City. These initiatives represent thoughtful, evidence-based approaches that reduce unnecessary and harmful involvement in the justice system while advancing public safety through sustainable, community-driven solutions.

The Center for Justice Innovation has a long and well-documented history of conducting original research and implementing direct service programs that promote equality, dignity, and respect in communities across New York City, including Staten Island. These values closely align with the vision of the Richmond County District Attorney's Office. My office has proudly partnered with the Center in the development of the Staten Island Community Justice Center, an initiative designed to reduce crime and incarceration, strengthen community trust in the justice system, and promote safer, more equitable neighborhoods through community-driven public safety strategies, youth opportunity, and economic mobility initiatives.

To maintain existing operations while expanding programming, Justice Center staff will dedicate time and expertise to developing new initiatives, including designing data collection and evaluation strategies to measure program effectiveness and ensure accountability. Through this partnership, we continue to reimagine a more holistic and equitable approach to justice—one that emphasizes prevention, diversion, and meaningful community-based support alongside traditional court responses. Investment in the initiatives outlined above will allow this work to continue and expand its impact in Staten Island and throughout the city.

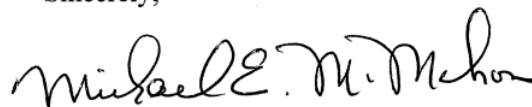
I also urge the Council to support **Youth Impact Staten Island**. Formerly known as Youth Court, Youth Impact is a dynamic youth leadership development program focused on peer mentorship, violence prevention, and restorative practices. The program works to keep young people engaged in school and out of the criminal legal system while fostering a youth-centered approach to community safety and healing. Through structured in-school partnerships and civic engagement opportunities, participants gain valuable skills in oral and written communication, facilitation, conflict resolution, and research. They also learn about the structure and impact of the justice system and receive training in community planning and organizing, empowering them to become leaders and advocates within their communities.

Continued investment is also critical to addressing the mental health needs of court-involved and at-risk youth. Individuals experiencing persistent and untreated mental illness must have access to culturally competent, trauma-informed mental health care. To address existing gaps in services for Staten Island youth, I urge the Council to continue and expand support for the Staten Island Justice Center's **Youth Wellness Initiative**. This program provides vital mental health services that promote healing and stability for young people involved in, or at risk of entering, the justice system. Importantly, the initiative also provides holistic support to families by offering resources and guidance to parents and caregivers of participating youth.

Finally, I support the continuation and expansion of the Center's **Driver Accountability Program**, which offers a constructive and restorative response to dangerous driving offenses. This program seeks to meaningfully change risky driving behavior among individuals charged with driving-related offenses in criminal court while promoting greater accountability and safer streets for all New Yorkers.

Thank you for your consideration of this request as the Council makes important funding decisions on behalf of the City of New York. If you have any questions, please contact Agency Chief Contracting Officer and Grants Coordinator Dr. Lisa Sloan at (718) 556-7089 or by email at Lisa.Sloan@rcda.nyc.gov.

Sincerely,


Michael E. McMahon
District Attorney

**DISTRICT ATTORNEY
COUNTY OF NEW YORK
ONE HOGAN PLACE
New York, N. Y. 10013
(212) 335-9000**



ALVIN L. BRAGG, JR.
DISTRICT ATTORNEY

March 20, 2026

Speaker Julie Menin
New York City Council
City Hall
New York, NY 10007

Speaker Menin and Members of City Council,

I am writing to express my support for the important services The Center for Justice Innovation (formerly, the Center for Court Innovation) provides to help advance our public safety goals.

My office works closely with Manhattan Justice Opportunities (MJO) which offers case management services in Manhattan's Felony Alternatives-to-Incarceration Court. Pathways prosecutors also staff and work closely with providers in the Midtown Community Justice Center Misdemeanor Mental Health Court ("Midtown"). The case managers, resource coordinators, and social workers at Manhattan Justice Opportunities and Midtown's Misdemeanor Mental Health Court provide important connections to community-based resources, critical mental health and substance abuse interventions, case management, and monitoring for people charged with crimes. As a result of their work, we can address the underlying issues that may have driven participants' behavior and decrease the use of jail and prison in instances when we believe doing so may have a detrimental effect on public safety. MJO and Midtown are key partners in our public safety work.

Many of Midtown's Mental Health Court participants work with the peer navigators who staff Midtown's Community First Program. The navigators work to ensure that participants are connected to community-based services most critical to their continuing care during their mandate, and after graduating. Finally, our prosecutors regularly rely on the Center's Driver Accountability Program (DAP) to provide a constructive and restorative response to dangerous driving and work to change the risky driving behavior of people charged with driving-related offenses in criminal court. DAP is also addressing more serious cases through a second tier of programming, Circles for Safe Streets, which brings together drivers and their victims through a restorative justice process. Our office has referred appropriate cases to Circles for Safe Streets to give families who have lost loved ones in vehicular accidents or victims who have been seriously injured in accidents another option in their healing process.

Speaker Julie Menin
New York City Council

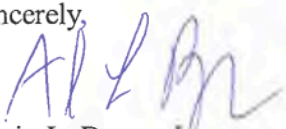
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March 20, 2026

Finally, the Center supports staff working at Midtown on the Community First team, neighborhood forums focused on community safety, and Midtown's Youth Advisory Board whose members work with the Midtown team to understand issues facing young people in their community so that the Midtown team may work to address them through their community-based work. These are efforts my office support.

Please feel free to contact my office with any further questions.

Sincerely,



Alvin L. Bragg, Jr.
Manhattan District Attorney

March 24, 2026
New York City Council
Hearing Before the Committee on Public Housing
Re: Preliminary Budget
Written Testimony of the New York Legal Assistance Group

Greetings Chair Banks and members of the New York City Council Committee on Public Housing. Thank you for the opportunity to submit testimony on the preliminary budget for NYCHA for FY 2027. New York Legal Assistance Group (“NYLAG”) uses the power of the law to help New Yorkers experiencing poverty or in crisis combat economic, racial, and social injustices. We address emerging and urgent needs with comprehensive, free civil legal services, financial empowerment, impact litigation, policy advocacy, and community partnerships. We aim to disrupt systemic racism by serving clients whose legal and financial crises are often rooted in racial inequality.

NYLAG works closely with community organizations, agencies, and elected officials, and operates numerous legal clinics in locations such as community centers, courthouses, and hospitals. With the full implementation of Right to Counsel at the NYCHA Office of Impartial Hearings (“OIH”), NYLAG created the Public Housing Justice Project (“PHJP”) within its Tenants’ Rights Unit (“TRU”). NYLAG’s PHJP is the first team of attorneys in New York City solely dedicated to representing NYCHA tenants. PHJP represents tenants in both Section 9 and Permanent Affordability Commitment Together, known as PACT, developments. We urge the City Council to take decisive action to prioritize and protect PACT tenants’ rights by conditioning this year’s PACT budget funding on NYCHA promulgating robust policies, procedures and protections on par with Section 9. Simultaneously, we urge the city to equitably fund Section 9 capital repairs and operations in order to ensure that NYCHA tenants have access to safe, sanitary housing.

NYCHA is the largest landlord in New York City. It is responsible for approximately 7% of New York City’s rental stock and is home to 1 in 17 New Yorkers. NYCHA apartments are family homes: tenancies are intergenerational and long term, averaging approximately 26 years. As NYCHA correctly notes in its 2025 Fact Sheets, these deep-seated communities are the equivalent of a city unto themselves, with more residents than Miami or Atlanta.¹

However, while analogies to prominent big cities around the country are helpful for illustrating the sheer size of NYCHA, it is not actually a city itself. Public housing residents are integral members of our communities: they are our neighbors, colleagues, friends, and classmates. The success of New York City is bound up in the success of NYCHA. For this reason, we are calling on City Council to ensure that NYCHA is fully funded, with safeguards put in place to ensure greater accountability to tenants in order to increase efficiency.

NYLAG applauds the \$662 million that has been allocated for Section 9 developments, including the \$38.4 million set aside to upgrade and modernize heating systems in Beach 41st Houses. NYCHA tenants deserve to live in safe, sanitary, and well-managed housing. Fully funding NYCHA's capital repairs and operations is necessary to make that a reality.

However, the preliminary budget also adds an additional \$670 million for the PACT program, bringing the total budget for PACT conversions to \$1 billion. To date, 92 developments have already been converted to RAD-PACT, with dozens more slated to convert. However, PACT is not popular among tenants, and most tenants living in PACT developments did not choose to do so. When they are given an opportunity to vote on whether to convert to PACT, most developments, and the overwhelming majority of voting residents, do not choose PACT. Out of the eight developments that have had a chance to vote on the matter, only one chose PACT.¹ At Stanley Isaacs Houses, which is the most recent development to vote, among tenants who voted in person, PACT only received 12 votes, compared to 280 votes for Section 9 and 200 votes for the Preservation Trust.² That means that after outreach and community education, only 2.4% of the votes were in favor of PACT.

Many people want to attribute PACT's unpopularity to misinformation and, while there is certainly some misinformation surrounding PACT, that is hardly the entire picture. PACT conversions destabilize public housing families. Year after year, the eviction filing and actual eviction rate in PACT outpaces that in NYCHA Section 9. On average across the city, actual eviction rates in PACT are about 5 times higher than in traditional Section 9, and close to that in private housing. In housing that is supposed to have some of the strongest protections, it is staggering that so many tenants are called into housing court and are unable to resolve the matter and avoid eviction. When this is the case, something is failing.

We submit the following testimony because NYCHA is home to hundreds of thousands of New Yorkers and the health and preservation of these homes and communities matters. While PACT seems to be necessary for the fiscal stability of public housing in New York City, NYCHA residents also deserve stability, and that stability does not come through alternate forms of funding, but through clear, reliable management by NYCHA. We call on the City Council to place conditions on PACT funding that require NYCHA overhaul its procedures and ensure that anyone living in a PACT development has exactly the same rights and protections as their neighbors living in NYCHA Section 9 public housing.

Public Housing Communities Deserve Fiscal Stability and Tenant Stability

A stable future for public housing in New York City requires that PACT tenants have the same robust procedural protections, and the same practical access to those protections, as their neighbors in Section 9. Since PACT was introduced, NYCHA has represented that tenants will have the "same rights" post-conversion as they did under Section 9. However, despite the fact that a tenant's property interest in maintaining their relationship with

¹ https://www.nyc.gov/site/nycha/residents/past_development_votes.page

² <https://www.thecity.nyc/2026/03/17/isaacs-vote-nycha-pact-trust-public-housing/>

NYCHA and therefore their tenancy is the same in PACT as it is in Section 9, post-conversion PACT tenants find that their rights have shifted closer to those of a Housing Choice Voucher-holder than a Section 9 tenant.

This decrease in protections is reflected in the number of actual cases that result in eviction. PACT landlords are evicting more people than NYCHA is. Housing court records do not show the actual universe of the number of cases that are prosecuted by NYCHA. In fact, the numbers are artificially low for NYCHA because the merits of NYCHA cases for anything other than the nonpayment of rent resolve at the NYCHA Office of Impartial Hearings (OIH) and so are not captured in housing court data. The only NYCHA cases in housing court are nonpays, licensee holdovers where succession defenses are resolved at OIH, and no-defense holdovers where the tenancy has already been terminated. This means that the number of NYCHA filings in housing court do not reflect cases brought by NYCHA based on breach of lease, nuisance, failure to occupy, misrepresentation, or chronic rent delinquency, that are resolved without the tenant being evicted either through settlement or trial. In other words, PACT landlords are not bringing more cases in housing court because they are more efficient managers of their developments; they are bringing more cases in housing court and consequently evicting more people because they are worse at solving problems for their tenants and because PACT tenants have fewer rights and tools at their disposal.

This is not only data, but the experiences of our clients. In our practice, we work with NYCHA and PACT residents across the city in a wide range of matters: from terminations of tenancy or remaining family member grievances at the NYCHA Office of Impartial Hearings, to nonpay and holdover eviction cases in Housing Court. Invariably, our PACT cases in Housing Court reach crisis points due to the PACT landlord and NYCHA being completely out of sync with each other.

As an example, one client, Ms. C., had been a NYCHA tenant for 10 years before her development converted to PACT. She lived with her sister, a senior citizen with advanced dementia, who was the tenant of record. One winter, Ms. C. went to visit family in the Dominican Republic. While she was gone, her sister died. She immediately returned to New York to find that while she was gone, she had been erroneously removed from her sister's household composition without her consent and without proof that she had ever permanently relocated out of the apartment. When we met her, she was facing a holdover eviction in housing court. When NYLAG reached out to NYCHA Leased Housing to resolve the issue, we were told that Ms. C. had no right to be heard or to succeed to the lease and there was nothing we could do. Ms. C. was not entitled to any process. In NYCHA's position, Ms. C. was out of luck and had to move out. It was not until NYLAG threatened to sue in federal court that NYCHA came to the table and resolved the case. That entire time, protracted litigation in housing court, NYLAG staved off eviction through continuous motion practice spread over multiple holdovers. The entire matter took almost two years to resolve.

Another example of this is Mr. Q. Mr. Q., a senior himself, had lived in NYCHA housing with his father prior to conversion to PACT. NYLAG represented him in a licensee

holdover in housing court after his father died. Before and during the conversion process, Mr. Q. and his father attempted to add him to the household composition but were unsuccessful. NYLAG advocated for Mr. Q. to receive Remaining Family Member status through an administrative process that NYCHA made up as it went along. Every step of the way, we received conflicting information from Leased Housing and the Customer Contact Center about Mr. Q.'s rights. Meanwhile, the PACT landlord used NYCHA's procedural ambiguity to push the holdover to trial, even though both parties agreed that NYCHA had to make the Remaining Family Member decision and we had not yet received a final determination. In the end, we lost at trial with a pending Article 78 petition in New York County Supreme Court. With a warrant of eviction hanging over our client's head, NYLAG was able to finally negotiate directly with a NYCHA attorney, provide documentary evidence, and settle the Article 78 with a lease for our client.

To be clear, this never would have happened in Section 9, where Ms. C. and Mr. Q. would have had a right to be heard through the Remaining Family Member grievance process. Under PACT, regardless of the merits of the case or the fault of the parties, remaining family members have no meaningful opportunity to be heard, and PACT landlords have no obligation to allow the administrative process to play out.

The problem is not limited to Remaining Family Member cases. It is a problem in eviction cases based on nonpayment of rent as well. Although PACT tenants ostensibly have the same right to file interim recertifications or rent grievances in order to ensure that their rent is properly calculated at 30% of their income, it is significantly more burdensome for them to do so, and unlike their neighbors in Section 9, they have no protection from eviction while their recertification or grievance is pending.

For example, another client of NYLAG's, Ms. A., is a PACT tenant that we represented in a nonpay case in Housing Court. Ms. A. disputed the amount of rent her landlord claimed because her portion had been miscalculated at her last recertification and she was being charged more than 30% of her income, in violation of federal housing law. We helped Ms. A. file a rent grievance. However, the PACT landlord grew impatient while the grievance was pending, and we were unable to get a response from NYCHA. Eventually, the PACT landlord refused to consent to another adjournment and the Housing Court judge said she would send the case to trial if we did not settle. Ms. A. was forced to agree to pay more than she lawfully owed because of NYCHA's failure to act and the PACT partner's unwillingness to wait. Had Ms. A. still lived in Section 9, under NYCHA's Admissions and Continued Occupancy Policy (ACOP) her nonpayment case would have been prohibited from moving forward until her grievance was resolved.

Ms. A. is far from alone. Not one of the client's NYLAG represents who lives in PACT has been able to successfully file an interim recertification or rent grievance through the portal and receive an actual result. While tenants in Section 9 can walk down to the management office to file or follow up on a recertification or grievance, the only successful recertifications or grievances our office has seen are ones where the tenant traveled to the walk-in center in Brooklyn and filed it there.

In another case, Ms. D.'s voucher was terminated after her PACT apartment failed HQS inspections and her landlord alleged she did not provide access. Confoundingly, she had an active HP Action in Housing Court to try and get the needed repairs at the time she received the notice that her voucher had been terminated. A long-time Section 9 tenant, she was unfamiliar with the processes for requesting a fair hearing to challenge a termination under Section 8, or how to restore her voucher. Had she still lived in Section 9, she would have been entitled to an *Escalera* termination of tenancy hearing before her tenancy was terminated.

In each of these cases, NYCHA's failure to provide a clear administrative infrastructure destabilizes households and unnecessarily puts tenants at risk of eviction. NYCHA's insistence on treating PACT tenancies like Housing Choice Vouchers instead of full Section 9 tenancies destabilizes households and leaves tenants without recourse.

PACT tenants deserve real parity with Section 9

Like in Section 9, PACT tenants' relationship with NYCHA determines their ability to remain in their home, and yet their procedural due process rights track those of Housing Choice Voucher (HCV) recipients. While loss of an HCV can ultimately lead to eviction because of ability to pay rent, an HCV and a lease are not so intertwined that one necessarily determines the other. A tenant can lose an HCV and maintain their lease, even applying for a different subsidy for the same unit. If a PACT tenant loses their Project Based Voucher, they will necessarily lose their lease and be evicted.

PACT tenants deserve to have the exact same procedural protections as Section 9 tenants. This includes:

1. An ability to submit interim recertifications and rent grievances and receive a prompt response.
2. Remaining Family Member grievances that include a right to be heard in front of an impartial hearing officer, present testimony and documentary evidence, and call witnesses.
3. Protection from eviction while administrative grievances are pending.
4. A right to pre-termination hearing that complies with all *Escalera* requirements.
5. Clear, ascertainable standards and procedures for any type of grievance that are published and publicly available.

Right now, Section 9 tenancies are governed by NYCHA's Admissions and Continued Occupancy Policy (ACOP), and PACT tenancies are governed by NYCHA's Section 8 Administrative Plan. The ACOP dedicates an entire chapter for grievances, a chapter for lease terminations, and a separate document containing termination procedures and standards. Exhibit A. These chapters include clear directions about how and where to file grievances, what forms to use, who will review the applications, how to appeal decisions, and the standards for the determinations. It also includes a list of bases for terminations, a description of each basis, the possible lawful outcomes of the termination, and a description

of a tenant's rights in the lead up to, during, and after a termination hearing. Anyone can read the ACOP and walk away with a clear understanding of their rights and how to navigate NYCHA's administrative hearing bureaucracy.

When a Section 9 tenant converts to PACT, they lose all of the transparency around the rules and procedures for obtaining and retaining their tenancy, as contained in the ACOP. Instead of several chapters of information, PACT tenants have the NYCHA Section 8 Administrative Plan, which dedicates one and a half pages to succession, and just over one page for RAD Resident procedural rights. Exhibit B. The information contained in the Administrative Plan is rife with cites to federal law, but contains almost no information for tenants interested in learning about the practicalities of their rights and how to access their rights while living in PACT.

The stark disparity in transparency and access to information between PACT and Section 9 tenants is a direct reflection of the differences in procedural rights, protections and standards for tenants under the two programs. It should not be the case that the city continues to funnel money into PACT while public housing tenants go from having some of the most protections to some of the least protections after PACT conversion. NYCHA is aware of these deficiencies and has taken no independent action to rectify this problem. NYLAG calls on the City Council to exercise its power and condition the PACT budget on NYCHA promulgating real, meaningful, accessible protections for tenants living in PACT developments.

The City must fully fund NYCHA's capital repairs and operations budgets and the City Council must exercise its oversight to ensure that those funds are effectively spent

NYCHA's developments are plagued by both large, systemic repair needs that would be addressed under the capital repairs budget as well as smaller, individual repair needs that are addressed through the operations budget. These budgetary needs are in competition with each other, but the practicalities of these repairs means that they must be addressed in concert. Putting off important capital repairs often results in a flood of increased individual repair needs, which puts additional and unnecessary strain on NYCHA's already underfunded repair bureaucracy and budget.

By way of example: A development may require the replacement of a line of a stack-pipe system. This is a significant undertaking that would be addressed through the capital repairs needs budget. However, an individual living in that development may be dealing with the fallout from years of having a corroded stackpipe behind their wall and may have related carpentry issues, such as water damaged walls and cabinets, which must be replaced. This smaller repair would be addressed through the operations budget. Similarly, NYCHA has shut down elevators for months in order to conduct planned capital repairs while providing no alternative system for elderly and disabled residents on high floors to leave their apartments. This trapped tenants with complex health conditions in their apartments, where their health issues were exacerbated by habitability conditions such as mold, poor ventilation, broken windows, and pest infestations.

Repair issues affect tenants beyond damaging their health and safety. When NYCHA ignores conditions, tenants must pay out of pocket to try to keep their homes safe for their families. One tenant NYLAG worked with had to buy their own water for weeks when the water in their apartment went out. Tenants frequently buy their own extermination supplies to try to control pests, ruin towels mopping up from recurrent leaks, and buy space heaters and blankets to try to get through freezing temperatures with no heat. When NYCHA ignores access dates, tenants pointlessly miss work, reschedule doctors' appointments, and call in favors to get their children picked up from school. Tenants suffer severe stress about asbestos and lead poisoning their children, while NYCHA takes months, or even years, to move them and abate the conditions.

Hazardous living conditions at NYCHA are compounded by mismanagement and misinformation. Before retaining an attorney from NYLAG to assist them, our clients often feel that they are left with no recourse due to misinformation from NYCHA staff. For instance, tenants are often told by management that no repairs can be made until they submit a repair ticket through the NYCHA portal, which requires a computer and internet access, or by calling NYCHA's Customer Contact Center, where wait times can be several hours long. Once tenants succeed in entering repair tickets, NYCHA will frequently close them without doing anything to investigate or repair the condition. When tenants call to follow up, NYCHA staff will tell them they have to submit a new ticket number in order for anything to be done. When tickets are acted on, maintenance will frequently "inspect" tenants' apartments over and over again without making any repairs, wasting NYCHA's time and money. NYCHA will give access dates to tenants that are months away, and then won't show up on those days, delaying repairs and requiring tenants to endlessly rearrange work and care schedules for access days that NYCHA will most likely ignore.

NYCHA needs to invest in creating structures and systems that enable them to manage the needs of their tenants responsively and effectively. The current disorganization leads to increased challenges for tenants and wasted resources. For example, one tenant dealing with a leak in her ceiling had painters and plaster repair workers sent to her apartment multiple times before the leak was fixed. Each time plaster and paint workers came to her apartment, they had to leave without doing any work, because paint cannot be applied before plaster, and wet plaster cannot be replaced if there is still an active leak. NYCHA departments also struggle to communicate internally, leading to poor scheduling and coordination.

For instance, a client had a major leak, and was told by NYCHA maintenance that it needed to be addressed by plumbing. When plumbing came to inspect, she was told that they could not do any work because it was actually a job for maintenance. When maintenance returned, they insisted it was actually a job for plumbing and that there was nothing they could do. This is further demonstrated by NYCHA's system for lead and asbestos remediation. NYLAG has worked with multiple clients who have had both asbestos and lead in their apartments. Asbestos abatement is handled by a different department than lead abatement, and the two departments do not communicate. NYLAG has worked with tenants who were relocated twice, once for each abatement, instead of NYCHA doing all the work at once, entirely because of this lack of communication between departments.

Certain vendors are incredibly difficult to schedule, which can delay the rest of the repairs and prolong litigation. For example, a client once waited six months for his bathtub to be reglazed, despite being represented by an attorney in an active HP action, because the scheduling was so difficult. Issues with miscommunication and coordination also appear in litigation outside of HP actions. One client was told that she had no right to mold remediation because she was currently seeking Remaining Family Member status. Another client was told she would have to wait for repairs until her Termination of Tenancy case was resolved. In each of these scenarios, the information provided to residents by NYCHA staff was incorrect under the law and NYCHA's own policies.

The conditions in NYCHA buildings are not an accident, and the city must fully invest in repairing the micro and macro systems that cause harm to NYCHA residents. NYCHA residents are disproportionately impacted by environmental racism due to conditions caused by both the internal and external environments of their homes. Many developments are located near high-diesel corridors, contributing to poor air quality. Other developments, such as Red Hook Houses, are built on marshland and are more susceptible to climate-related flooding.³ Meanwhile, developments such as Cooper and Gowanus Houses are located in close proximity to superfund sites.⁴ Developments like O'Dwyer Gardens in Coney Island suffered severe damage during Hurricane Sandy which has yet to be appropriately addressed, and residents still suffer from inconsistent heat and hot water, flooding, and severe mold. Indoors, NYCHA apartments are plagued by peeling lead paint, asbestos, defective plaster, plumbing issues, broken windows, mold, failing heat systems, cockroaches, rodents, leaks, and crumbling appliances. These conditions are often left unaddressed for long periods of time, even after tenants place tickets and work orders are opened. In 2023, NYCHA issued a report finding that between 2019 and 2023, the average number of days to address work orders increased from 38 to 295 days.⁵

The combination of external and internal environmental conditions has a profound impact on NYCHA residents' health. NYCHA developments have higher rates of particulate matter 2.5 (PM 2.5) than Section 8 developments and beyond what is acceptable according to the Environmental Protection Agency.⁶ PM 2.5 is caused by proximity to diesel exhaust,

³ Kasakove, Sophie, Williams, The Nation, "Is New York City's Public Housing Ready for the Next Storm?" (2019), <https://www.thenation.com/article/archive/new-york-climate-change-public-housing/>.

⁴ Mahoney, Adam, The City, "Public Housing Tenants Struggle Against the 'Slow Violence' of Industrial Pollution" (Jan. 9, 2023) <https://www.thecity.nyc/2023/01/09/brooklyn-public-housing-cooper-park-industrial-pollution/>.

⁵ NYCHA's Office of Mold Assessment and Remediation, "2023 Report on NYCHA's Mold and Leak Response Efforts: Progress, Challenges and Next Steps" (2023), <https://www.nyc.gov/assets/nycha/downloads/pdf/NYCHA-Report-on-Mold-and-Leak-Response-Efforts-2023.pdf>

⁶ Thrope, Lorna E., Anastasiou, Wyka, Tovar, Gill, Rule, Elbel, Kaplan, Jiang, Gordon, Shelley, JAMA, "Evaluation of Secondhand Smoke Exposure in New York City Public Housing After Implementation of the 2018 Federal Smoke-Free Housing Policy (2020), <https://pmc.ncbi.nlm.nih.gov/articles/PMC7645700/>

highways, poor air circulation and filtration, pest infestation, and mold spores.⁷ Long-term exposure increases the risk of heart disease, asthma, low birth weight, and dementia.⁸ Indeed, children in NYCHA experience disproportionately high rates of asthma. Between 2010 and 2014, preventable asthma hospitalizations among NYCHA residents were 300% higher than the citywide average.⁹

The adverse environmental conditions at NYCHA are creating an ongoing health crisis. The City Council must take affirmative steps to prevent these crises from worsening by creating plans for large capital repairs and comprehensive modernizations that go beyond cosmetic changes and that will improve the indoor air quality and the lives of NYCHA residents.

Funding Requests

We strongly urge the City Council to

1. Condition funding of the PACT program on NYCHA overhauling its procedures to achieve true parity with the standards of Section 9 and provide tenants with stability and protection. PACT standards, procedures, and tenant protections must closely follow those of Section 9, not of Section 8.
2. Ensure an equitable distribution of funds for both capital repairs and operations budgets: Developments should receive fair funding regardless of whether they opt into the PACT Program, Preservation Trust, or remain in Section 9.

The fiscal future of public housing in New York City may require PACT, but stable housing requires stable tenancies. The City Council must act to ensure the future of the hundreds of thousands of New Yorkers who call NYCHA—and PACT—home. Thank you for your time and consideration.

Respectfully submitted,

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Project Director, Public Housing Justice Project

⁷ “Inhalable Particulate Matter and Health” California Air Resources Board, <https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health>.

⁸ Zhang B, Weuve J, Langa KM, D'Souza J, Szpiro A, Faul J, Mendes de Leon C, Gao J, Kaufman JD, Sheppard L, Lee J, Kobayashi LC, Hirth R, Adar SD, JAMA, “[Comparison of Particulate Air Pollution From Different Emission Sources and Incident Dementia in the US.](#)”

(2023) <https://pubmed.ncbi.nlm.nih.gov/37578757/>.

⁹ Thompson, Izhah, Stein, Sam, Mironova, Oksana, Portis, Lonnie, The Community Service Society of New York, “The Other Housing Crisis: Poor Housing Conditions Are Not Only a NYCHA Problem—They’re a Low-Income Housing Problem”, (2024), <https://www.cssny.org/publications/entry/the-other-housing-crisis-poor-housing-conditions-NYCHA-low-income>

Tenants' Rights Unit
New York Legal Assistance Group

Sophia Fenn
Skadden Fellow, Public Housing Justice Project
Tenants' Rights Unit
New York Legal Assistance Group

Exhibit A

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Chapter 11: Lease Terminations

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Chapter 11: Lease Terminations



A. Overview

This chapter will describe lease terminations. As defined in the lease agreement and in accordance with NYCHA policies, state and local laws, the resident or NYCHA may terminate the lease and tenancy at any time by providing written 30 calendar days' advance notice to the other party.

B. Key Acronyms

- CFR: Code of Federal Regulations
- NYCHA: New York City Housing Authority
- SSN: Social Security Number
- VAWA: Violence Against Women Act

C. Resident Move-Out

[i. Lease Termination by Resident \(Move Out\)](#)

Residents must give NYCHA 30 calendar days prior written notice when they intend to move out of their apartment, using NYCHA Form 040.032, Notice of Intent to Vacate, including the date the resident will move out. The notice period must be 30 consecutive calendar days but does not necessarily have to include a calendar month.

NYCHA charges rent until the resident moves out of the apartment, turns in the keys, and NYCHA takes possession of the apartment. If the resident moves out before or after the date listed on the Notice of Intent to Vacate, NYCHA charges the resident up until the date they move out of the unit.

NYCHA inspects the vacated apartment with the resident if the resident has given prior notice and wants to be present for the inspection. Refer to Chapter 9, Inspections, for more information.

D. Abandoned Apartments

When NYCHA determines that an apartment has been abandoned, NYCHA will charge the resident rent through the date NYCHA gained possession of the apartment.

E. NYCHA-Initiated Terminations

Termination of tenancy may be required due to prohibited conduct by a resident, a member of the resident's family, or a guest, or for non-payment of rent. NYCHA terminates tenancies pursuant to its Termination of Tenancy Procedures with the opportunity for an administrative hearing that affords residents due process.

i. Escalera and Tyson-Randolph Decisions

Termination of tenancy for grounds other than nonpayment of rent is governed by a federal consent decree in the case of *Escalera v. New York City Housing Authority*, later modified by the *Tyson-Randolph* cases. NYCHA termination of tenancy procedures were created in response to these decisions. Grounds for termination under these procedures are non-desirability, breach of rules and regulations, chronic breach of rules and regulations, chronic rent delinquency, non-verifiable income, assignment or transfer of possession, and misrepresentation.

Before a tenancy in public housing can be terminated for reasons other than nonpayment of rent, the resident must be offered an administrative hearing held by an impartial Hearing Officer based on written charges served on the resident prior to the hearing. Witnesses may be produced both by NYCHA and the resident and may be examined and cross-examined. Residents may be represented by counsel or other persons of their own choice at the hearing. If the resident cannot afford an attorney, the resident may seek counsel from a legal services organization that provides free services. The Hearing Officer's decision will be made in writing on the charges presented. The Hearing Officer may make a disposition about action to be taken in the case including termination of tenancy, probation, or permanent exclusion or find the tenant eligible for continued occupancy in public housing.

ii. Grounds for Termination

There are specific grounds on which termination of tenancy proceedings may be based. These grounds are described below.

1. Misrepresentation

The willful misstatement to, or concealment from, NYCHA by the resident of any material fact bearing upon or relating to the resident's eligibility for admission or continued occupancy or bearing upon the amount of rent to be paid by the resident.

2. Breach of Rules and Regulations

The breach by the resident, or any person occupying the resident's apartment, of any applicable rule, regulation, or resolution of NYCHA. The resident will be given an opportunity to cure/resolve the Breach of Rules and/or Regulations.

3. Chronic Breach of Rules and Regulations

The repeated violation by the resident or any person occupying the resident's apartment of any NYCHA rule or regulation which the resident had previously reported as cured/resolved by compliance. The resident will not be given an opportunity to cure/resolve a Chronic Breach.

4. Chronic Delinquency in the Payment of Rent

The resident's repeated failure or refusal to pay rent within the month due, at least four times during any 12-month period ("4 in 12"). Rent need not be in arrears at the time the action is instituted if the record clearly shows repeated failure or refusal to pay.

5. Non-Verifiable Income

The resident's failure, neglect, or refusal to provide NYCHA 040.297, Public Housing Affidavit of Income-Annual Recertification and NYCHA 040.297C, Public Housing Affidavit of Income-Active Family Members (when applicable) and the required supporting documentation.

If the resident is self-employed and does not keep proper records, as required, or fails to provide information required, the action to terminate may be based on Breach of Rules and Regulations as well as on Non-Verifiable Income.

6. Assignment or Transfer of Possession

The possession and use of an apartment by a person or persons other than the resident of record, without NYCHA permission or consent, after the resident of record has moved from the apartment or no longer resides there. This also includes a NYCHA resident subletting or providing short-term rentals for a NYCHA apartment.

7. Non-Desirability

Non-desirability is defined by NYCHA as the conduct or behavior of the resident, their guest, or any other person occupying the apartment of the resident which constitutes:

- A danger to the health and safety of the resident's neighbors;
- Conduct on or in the vicinity of NYCHA premises which is in the nature of a sex or a moral offense;
- A source of danger or a cause of damage to the employees, premises, or property of NYCHA;
- A source of danger to the peaceful occupation of other residents; or
- A common law nuisance.

8. Failure to sign NPHOI Lease

If a resident who is over-income for 24 consecutive months declines to sign an NPHOI lease with the alternative rent, NYCHA will proceed to initiate a holdover proceeding in Landlord and Tenant Court. The resident will continue to be a public housing program participant with their public housing rent in the period before eviction. NYCHA is required to evict the household no later than six months after the date of the 24-month notification. Refer to Chapter 8(h), Over-Income Residents, for more information.

iii. Notification

NYCHA notifies residents of their breach of lease by mailing or hand delivering the below notices:

- NYCHA Form 040.297B, Annual Recertification Additional Forms Cover Letter (only sent out to residents who did not submit their Annual Recertification, all other breach of lease notifications start with NYCHA Form 040.185)
- NYCHA Form 040.185 Termination of Tenancy & Possibly Subsidy-Call-In Letter
- NYCHA Form 040.186 Termination of Tenancy & Possibly Subsidy-Follow Up Call-in-Letter (sent to resident if they failed to appear/respond to NYCHA Form 040.185)
- NYCHA 040.187 Termination of Tenancy and Possibly Subsidy-Notice to Tenant of Manager's Recommendation to Terminate

If the resident has been found ineligible for continued occupancy, NYCHA Form 040.004, 30 Day Notice to Vacate is served once the Determination of Status and Hearing Officer's decision have been sent to the resident. The 30 Day Notice to Vacate clarifies that the resident is to vacate the premises by a date not less than one calendar month from the date of its mailing or other service. The Notice also informs the resident that failure to vacate will result in the commencement of holdover proceedings leading to eviction.

F. Terminations Related to Violence Against Women Act (VAWA)

Prior to starting the termination process, NYCHA reviews the resident's records to determine if any household members have submitted documentation claiming protections under VAWA relating to the grounds for termination.

VAWA incidents cannot be the basis for terminating the tenancy of any household member other than the tenancy of the abuser(s), subject to the limitations of VAWA protections described below. In addition, a tenancy cannot be terminated as a direct result of the fact that the resident is or has been a victim of a VAWA incident.

i. Limitations of VAWA Protections

1. Charges Against All Residents

Under VAWA, termination of tenancy charges may be brought against all residents, including victims of VAWA incidents, for chronic rent delinquency, non-verifiable income, misrepresentation, breach of rules and regulations, assignment or transfer of possession, and any non-desirable act other than VAWA incidents, so long as the non-desirable acts are not a direct result of the VAWA incident. VAWA incidents include domestic violence, dating violence, stalking, and sexual assault.

2. Charges Against a Resident For Actual And Imminent Threat to Others

VAWA permits the termination of any resident's tenancy, even the victim's, if that resident presents an actual and imminent threat to other residents, NYCHA property, NYCHA employees, or service providers.

An actual and imminent threat to others, as defined in federal regulations, is a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. Factors to consider in determining whether an individual would pose an actual and imminent threat include:

- The duration of the risk;

- The nature and severity of the potential harm;
- The likelihood that potential harm will occur; and
- The length of time before potential harm would occur.

3. Charges Against an Alleged VAWA Victim

Charges may also be brought against a person who claims to be a VAWA victim but fails to provide necessary documentation to verify they are a VAWA victim; refer to Chapter 2(g)(ii)(4), Documentation, for more information.

4. Mixed Charges

If charges are brought against the abuser(s) for committing criminal acts directly relating to VAWA incidents, in addition to charges against the tenancy involving non-VAWA incidents, e.g., chronic rent delinquency or non-desirability on non-VAWA related grounds, the VAWA-related charges should specify they are brought against the abuser(s) only, while the other charges should specify that they apply to all residents.

Termination of tenancy charges will not be brought against the victim unless there are no other actions short of termination that may be taken to reduce or eliminate the threat.

Other possible actions short of terminating the tenancy of the victim may include, but are not limited to, the following:

- Transferring the victim if they meet the emergency transfer requirements;
- Working with the victim to remove the abuser from the household;
- Contacting the New York City Police Department (NYPD) to increase patrols or to develop other plans to keep the property safe; or
- Determining if the victim has obtained an order of protection barring the abuser from the property (sometimes known as an “exclusionary order of protection”) or obtained other legal remedies.

In making termination determinations, NYCHA may not subject a victim of a VAWA incident to a more demanding standard than the standard applied to non-victim residents.

VAWA does not change existing grounds for termination of tenancy. Charges based on criminal acts directly relating to VAWA incidents, for example, fall within non-desirability and/or breach of rules and regulations.

G. Terminations Related to Failure to Disclose or Document Social Security Numbers

NYCHA must terminate the assistance, the tenancy, or both, of a resident and the resident's household, in accordance with the provisions governing the program, if the resident does not meet the applicable Social Security Number (SSN) disclosure, documentation, and verification requirements specified in Chapter 7(h)(vi)(2), Social Security Numbers.

- NYCHA may defer termination and provide the resident with an additional 90 calendar days to disclose a SSN, but only if NYCHA, in its discretion, determines that:

- Failure to meet these requirements was due to circumstances that could not have reasonably been foreseen and were outside the control of the resident; and
 - There is a reasonable likelihood that the resident will be able to disclose a SSN by the deadline.
- Failure of the resident to disclose a SSN by the deadline specified above will result in termination of the assistance or tenancy, or both, of the resident and the resident's household

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Chapter 11: Lease Terminations



Effective: 1/1/24

Last Revision: 12/15/23

NEW YORK CITY HOUSING AUTHORITY

TERMINATION OF TENANCY PROCEDURES*

The purpose of publishing these procedures is to enable a tenant who faces termination of tenancy proceedings by the New York City Housing Authority to know the legal basis of such administrative proceedings, the procedures which the Authority will follow, and to enable the tenant to prepare an appropriate defense to such termination of tenancy proceedings.

The following procedures apply to termination of tenancy by the New York City Housing Authority to conform with the opinion of the United States Court of Appeals for the Second Circuit and the action of the United States District Court for the Southern District of New York in the case of *Escalera, et al v. New York City Housing Authority*, 425 F. 2d 853, certiorari denied, 400 U.S. 853 (1970), consent decree on remand docketed March 25, 1971, 67 Civ. 4307 (S.D.N.Y. 1971, D.J. Mansfield), and the consent judgements of January 26, 1976 in the United States District Court for the Southern District of New York cases of *Joseph Tyson Sr. v. New York City Housing Authority* and *Myrdes Randolph v. New York City Housing Authority*, 73 C 859, 74 C 1856, 74 C 2556, 74 C 2617 (S.D.N.Y. 1976, Metzner, J.).

GROUNDS FOR TERMINATION OF TENANCY

1. These procedures will deal with termination of tenancy brought on any of the following grounds: Non-Desirability, Breach of Rules and Regulations, Chronic Breach of Rules and Regulations, Chronic Delinquency in the Payment of Rent, Non-Verifiable Income, Assignment or Transfer of Possession, and Misrepresentation.

- A. NON-DESIRABILITY** is defined by the Authority as the conduct or behavior of the tenant or any person occupying the premises of the tenant which constitutes:
- (1) a danger to the health and safety of the tenant's neighbors
 - (2) conduct on or in the vicinity of the Authority premises which is in the nature of a sex or morals offense
 - (3) a source of danger or a cause of damage to the employees, premises or property of the Authority
 - (4) a source of danger to the peaceful occupation of other tenants, or
 - (5) a common law nuisance.
- B. BREACH OF RULES AND REGULATIONS.** The violation by the tenant or any person occupying the premises of the tenant of any applicable rule, regulation or resolution of the Authority. The tenant will be given an opportunity to cure the breach.
- C. CHRONIC BREACH OF RULES AND REGULATIONS.** The repeated violation by the tenant or any person occupying the premises of the tenant of Authority rules and regulations or a single repetition of a violation of any Authority rule or regulation which the tenant previously had reported to have been cured by compliance. The tenant will not be given an opportunity to cure the breach.
- D. CHRONIC DELINQUENCY IN THE PAYMENT OF RENT.** The repeated failure or refusal of the tenant to pay rent when due.
- E. NON-VERIFIABLE INCOME.** The failure, neglect or refusal of a tenant to furnish the Authority verification satisfactory to the Authority of the income of the tenant, or to keep records of income and disbursements or submit the same to an audit in accordance with the requirements and directives of the Authority.
- F. ASSIGNMENT OR TRANSFER OF POSSESSION.** The possession and use of a project apartment by a person or persons other than the tenant of record, without Authority permission or consent after the tenant of record has moved from or no longer resides in the apartment.
- G. MISREPRESENTATION.** The willful misstatement to or concealment from the Authority by the tenant of any material fact bearing or relating to any determinant of the tenant's eligibility for admission or continued occupancy or bearing upon or relating to the rent to be paid by the tenant.

PROJECT MANAGER INTERVIEW

2. The project manager or his representative will interview the tenant in order to discuss the problem which may lead to termination of tenancy, seek to ascertain the facts involved, and, when appropriate, seek to assist the tenant by securing outside help.

THE TENANCY ADMINISTRATOR

3. If remedial action by the Manager fails, or if the Manager believes that termination of tenancy is the appropriate course of action, he shall submit the entire file, together with his/her written recommendations and the reason therefor, to the Tenancy Administrator for review and appropriate action. If the case is based on non-desirability, the Manager shall consider in reviewing the file, among other things, the extent of the impact of the behavior of the tenant's family upon the project. If the Tenancy Administrator finds, after review of the file that a basis for termination of tenancy proceedings exists, the file shall be referred to the Authority's Law Department for the preparation of a Notice of Charges.



NOTICE OF CHARGES

4. The Law Department shall prepare a Notice of Charges in which there shall be set forth the specific grounds for the proposed termination action. Where the charges involve non-desirability, the specific subsection(s) of the regulation shall be set forth which are claimed to have been violated. A copy of these procedures shall be enclosed with the Notice to the tenant. Such Notice shall give the tenant at least 15 days advance notice of the date fixed for a hearing to be held before a Hearing Officer designated by the Authority. It shall request the tenant to answer the charges and to signify his/her intention to attend the hearing, in writing, at least 5 days prior to the date set for the hearing. The Notice shall be served upon the tenant or any adult member of his/her family, or by certified mail, postpaid, and addressed to his/her apartment in the project. A copy of the Notice shall be furnished to the Hearing Officer, who shall calendar the hearing for the time specified therein.

THE HEARING

5. Such Hearing Officer shall be an impartial disinterested attorney admitted to practice before the Courts of New York State appointed in a Civil Service title approved by the New York City Civil Service Commission. Until such title is so approved, the Hearing Officer shall continue to be appointed in accordance with the existing procedures for the appointment of Hearing Officers (Tenancy). Prior to the completion of the hearing and his/her written decision upon the charges set forth in the Notice, the Hearing Officer shall not have had any part in the proceeding or access to the files, information, records or recommendation upon which the proposed termination action is to be based. The Hearing Officer shall be liberal in granting reasonable adjournments requested by the tenant or his/her representative for good cause shown, to assure that there be no doubt that the tenant is afforded every due process right provided by the federal court decree.

6. The Hearing Officer shall conduct a hearing at which the Law Department shall present the case.

- (a) The Hearing Officer shall hear witnesses and receive oral and written evidence in proof by the Authority of the grounds specified in the Notice, and of like evidence of the answer offered by the tenant. Cross-examination shall be permitted. Technical rules of evidence shall not be enforced, but the proof offered shall be relevant to and based upon the grounds involved.
- (b) The Authority will permit the tenant's attorney or his/her representative (or, with the specific permission of the Authority, which shall not be unreasonably withheld, the tenant pro se) to examine such matter in the tenant folder as relates to the issues in the administrative termination proceeding (excluding names of persons not involved in the pending proceeding), upon request, in advance of the hearing, by appointment at the Authority's Central Office. Any matter not so made available after request therefor may not be relied on by the Authority at the hearing.
- (c) Subpoenas shall be issued at the request of the tenant or his/her representative, where appropriate.
- (d) If the charges brought against the tenant are based upon the non-desirable acts, conduct or behavior of a person (the "Offender") other than the tenant, it is the Housing Authority's responsibility to prove that the offender occupied the premises at the time of the offense. However, even if the Housing Authority proves this, the tenant may still show that the offender has permanently moved out by the time of the hearing.

The tenant may be able to avoid the penalty of losing his or her apartment if:

- (i) at the hearing on the charge(s), the tenant claims the offender has left the tenant's apartment permanently; and
- (ii) the tenant presents evidence to the Hearing Officer to support this claim.

Evidence that the tenant presents in support of this claim (that either the offender did not occupy the apartment at the time of the offense or has since permanently moved out), such as a signed lease and/or rent receipts at another address, or a letter from Welfare or Social Security showing the offender's new address, shall be proof that the offender did not or does not occupy the tenant's apartment, except that the Authority may challenge this evidence before the Hearing Officer. Nothing contained in this paragraph 6 (d) is meant to limit the tenant's right to offer any evidence to the Hearing Officer that an offender is no longer occupying the tenant's apartment, including any spoken or written statement by the tenant or other persons.

- (e) If the tenant introduces character testimony or claims that his/her prior record as a tenant is unblemished, the Authority may at the hearing confront the tenant with adverse material in its possession, such as entries in the tenant folder, probation reports, other convictions, police records, etc., and cross-examine the tenant as to such information.
- (f) Before the close of the hearing, the tenant or his/her representative shall be permitted to make a general statement, in mitigation, as to why his/her tenancy should not be terminated. This will enable the Authority to consider matters which do not strictly pertain to the stated grounds for termination but relate more properly to the family situation or other extenuating circumstances. The Authority may reply thereto for the record.

7. The proceedings shall be recorded by mechanical device. The tenant or the Authority may arrange in advance and at the expense of the party ordering the transcript, for a transcript of the hearing; provided, however, that in the event that the tenant orders the transcript he must deposit with the Authority an amount estimated by the Authority to cover the cost there of prior to the making of the transcript. The other party may purchase a copy of such transcript. In the event judicial review is undertaken by the tenant he/she shall be furnished with a copy of the transcript without charge.



8. If the tenant fails to answer or appear at the hearing the Hearing Officer shall note the default upon the record and shall make his/her written decision on the record before him. Upon application of the tenant made within a reasonable time after his/her default in appearance, the Hearing Officer may, for a good cause shown, open such default and set a new hearing date.

9. Remote Hearings. The hearing may be conducted remotely or in person at the tenant's option, provided that adequate arrangements can be made to conduct the remote hearing in compliance with due process requirements, including, where appropriate, the provision of language assistance or the granting of a reasonable accommodation. Tenant will be provided with a copy of the remote hearing procedures and instructions for proceeding remotely, including the use of video call and the presentation of witnesses and evidence. If the tenant does not select an option, NYCHA will conduct the hearing in person. All other procedures governing hearings under the Procedures remain the same for hearings conducted remotely.

THE DECISION OF THE HEARING OFFICER

10. The Hearing Officer shall prepare a written decision, which shall contain the reasons therefor, within a reasonable time after the hearing. The decision shall set forth with respect to each of the charges, the answers thereto, and all relevant issues raised at the hearing, his/her specific findings including findings as to whether the charges have been proven. Such decision shall be based solely upon the testimony, documents and physical evidence admitted into evidence at the hearing. If any charge is found to have been proven, the decision shall set forth the penalty to be imposed or the action to be taken. Where the tenant has introduced character testimony or has claimed that his/her prior record as a tenant is unblemished, the Hearing Officer may consider all the testimony and documents admitted into evidence at the hearing on this subject as well as the tenant's general statement, if any, in mitigation, and the Authority's reply thereto, in making his decision as to the penalty to be imposed. The Hearing Officer's decision together with the testimony, documents and physical evidence admitted into evidence at the hearing shall constitute the Record. A copy of the decision shall be sent to the tenant or his representative and the Authority. The Authority shall retain a copy of the decision in the tenant's folder. A copy of such decision with all names and identifying references deleted, shall also be maintained on file by the Authority at Central Office and made available for inspection by tenants, their representatives, or Hearing Officers.

11. In the event that any charge is found to have been proven, the Hearing Officer may make any of the following dispositions:

- (a) Termination of tenancy;
- (b) Probation;
- (c) Eligible subject to permanent exclusion of one or more persons in the household;
- (d) Eligible;
- (e) Eligible with referral to Social Services.

12. The decision of the Hearing Officer shall be binding on the Authority, which shall take all action, or refrain from any action, necessary to carry out the decision, unless notice is mailed to the tenant or his/her representative within ten (10) days from the date of such decision that the decision is under review by the members of the Authority. In reviewing the decision, the members of the Authority shall consider and rely only upon the Record, and such review shall be limited to whether the decision of the Hearing Officer is contrary to applicable federal, state or local law, HUD regulations, requirements of the Annual Contributions Contracts between HUD and the Authority, or violates these Authority procedures by reason of procedural irregularity. The determination by the members shall be made within a reasonable time, and where such determination is less favorable to the tenant than that of the Hearing Officer, the Authority shall include therewith a written statement setting forth the specific bases, including the basis in law, regulations, contracts, or procedure, for making such determination. The Authority must promptly notify the tenant or his/her representative of the determination.

13. A decision by the Hearing Officer or a determination by the members of the Authority in favor of the Authority or which denies the relief requested by the tenant, in whole or in part, SHALL CONSTITUTE A WAIVER of the rights of the tenant to a trial de novo or judicial review in any judicial proceedings, except a judicial proceeding to review said decision or determination pursuant to Article 78 of the New York State Civil Practice Law and Rules.

14. Where the offender or offenders has (have) been removed from the household, it is mandatory that the disposition be: "eligible"; "probation"; or "eligible subject to permanent exclusion of one or more persons in the household". If there is more than one offender involved, the Hearing Officer may in such case make a disposition of both probation and permanent exclusion, each applicable to a different offender. Where a violation of probation or permanent exclusion is alleged, a hearing shall be accorded to the tenant on the alleged violation, according to the procedures set forth below.

PROBATION

15. Where any substantial charge of non-desirability has been proven and the disposition is "eligible subject to permanent exclusion of one or more persons in the household", the provisions of this paragraph and of Pars. 15 and 16 shall not be applicable. In all other cases, where any substantial charge of non-desirability has been proven, a tenant may be given probation for a specified term not to exceed a year when the conditions set forth in subparagraph (a) exist, and must be given probation for a specified term when the conditions set forth in subparagraph (b) exist:

- (a) There is reason to believe that the conduct or condition which led to the charge of non-desirability may not recur or may have been cured, or that the tenant is taking or is prepared to take steps to correct or cure such conduct or condition.
- (b) Absence of the offending member from the household (confinement in jail, away in the Armed Services, participation in residential drug program, etc.).



16. The Authority may set forth, in addition to the duration of probation, which shall be for not more than one year, other specific conditions to probation, such as the continued absence of an offending family member from the project grounds, the continued treatment of a drug addict, etc. Where a specific condition of probation is the continued absence of an offending family member, the family undertakes to do anything it reasonably can to keep the offending member away from the project premises. If the offending member returns to the premises during the period of probation, the burden is on the tenant family to show that they had done all they could to keep him from returning.

17. A violation of the general condition of probation shall consist of an act or omission on the part of a tenant or a member of his/ her household occurring after an award of probation, which constitutes a ground for termination of tenancy under these procedures. Such act or omission may be one which, had it been the first infraction by the tenant, might have resulted in an award of probation, but may now be sufficient to warrant immediate termination of tenancy. Where an act which may constitute a violation of the general condition of probation has occurred, the provisions of Par. 14(b), above, are inapplicable.

VIOLATION OF PROBATION

18. In the event that in the opinion of the Manager during the term of probation the tenant has violated any condition of probation, he/she shall submit the tenant's folder together with a statement of the acts purportedly constituting the violation of probation to the Tenancy Administrator who shall forward the folder and statement to the Law Department if he/she finds there is a basis for a possible violation of probation. The Law Department shall prepare a summary of such alleged violations and notice of a hearing pursuant to Paragraph 4 above, and mail a copy thereof to the tenant or his representative.

19. A hearing to determine whether a violation of probation has occurred shall be conducted in accordance with paragraphs 5 through 10 above, except that only one adjournment shall be granted for good cause at the request of the tenant or his representative. Any further adjournment may be granted only on an affidavit setting forth a legal excuse. If the Hearing Officer finds there has been no violation of probation, he/she shall recommend that probation continue as prescribed. If the Hearing Officer finds there has been a violation of probation, he/she may make any of the following dispositions:

- (a) Immediate termination of tenancy;
- (b) Continuation of probation already prescribed; or
- (c) Probation for an additional prescribed period not to exceed a year on such additional terms or conditions as may be appropriate.

A copy of the Decision and Report on the alleged violation of probation shall be mailed to the tenant or his representative.

CHANGE OF CONDITIONS OF PROBATION

20. The tenant may apply for review, modification or termination of probation at any time a substantial change has occurred bearing on the need for probation, such as a definitive change in family composition. The tenant's application shall be in writing, addressed to the Tenancy Administrator, who shall submit such application to the Hearing Officer. The Hearing Officer may in his/ her discretion:

- (a) Continue the probationary period unchanged;
- (b) Modify the duration or terms of probation; or
- (c) Remove the condition of probation from the tenant's status.

The tenant or his/her representative shall be informed in writing of the action on the application.

HOW PROBATION ENDS

- 21. (a) Where no proceeding on an alleged violation of probation is pending nor any violation of probation is known to the Manager, he/she shall prepare a report at least thirty (30) days prior to the end of the prescribed year of probation which certifies to such facts and recommends the removal of the condition of probation from the tenant's status. The Manager's report and recommendation shall be sent to the Tenancy Administrator, who shall note the removal of the condition of probation from the tenant's status. A copy of the Tenancy Administrator's memorandum shall be mailed to the tenant or his representative.
- (b) If at any point during the year of probation an Authority employee other than the Manager discovers that there is evidence that a violation of probation may have occurred, the procedures set forth in Pars. 17 through 18, above, shall be followed.
- (c) If the probationary period is concluded and the Manager shall have failed to make the report as provided in subparagraph (a) hereof, and no proceeding on an alleged violation of probation is pending, the condition of probation to the tenant's status shall be automatically removed at the conclusion of four months after the end of the year of probation and the tenant or his/her representative shall be so informed in writing by the Tenancy Administrator.

22. Anything to the contrary herein notwithstanding:

- (a) Any member of the Authority may at any time during the term of probation direct the Manager to submit a probationary report.



- (b) The procedures in cases where a member or members of the Authority requests a probationary report shall be the same as if the Manager had submitted the report on his/her own initiative. If it appears that a violation of probation may have occurred during the term thereof, the procedures set forth in Pars. 17 through 18, above, shall be followed.

PERMANENT EXCLUSION

23. In the event that in the opinion of the Manager the tenant shall have violated the condition of permanent exclusion of one or more persons in the household which shall have been placed upon his eligibility, the procedures set forth in Pars. 17 through 18, above, shall be followed.

24. If the Hearing Officer decides that the condition of permanent exclusion of one or more persons in the household has been violated he/she may:

- (a) Make a final decision that the tenant is ineligible for continued occupancy forthwith, or
- (b) Continue the condition on such additional terms or conditions as may be appropriate. The tenant or his/her representative shall immediately be informed in writing of such decision.

REMOVAL OF PERMANENT EXCLUSION

25. The tenant found eligible subject to permanent exclusion of one or more persons in the household may apply for removal of the condition at any time a substantial change has occurred bearing on the need for such condition for eligibility. The tenant's application shall be in writing, addressed to the Tenancy Administrator, who shall submit such application to the Hearing Officer. The Hearing Officer may in his/her discretion:

- (a) Continue the condition unchanged, or
- (b) Remove the condition of permanent exclusion of one or more persons in the household from the tenant's status of eligible.

The tenant or his/her representative shall be informed in writing of the Authority's action on the application.

EVICITION PROCEEDINGS

26. If a hearing has been held hereunder and the Hearing Officer has determined to terminate the tenancy, the Authority shall not commence an eviction action in a State or local court until it has served a Notice to Vacate, which shall not be served prior to the mailing or other delivery to the tenant of a copy of the Hearing Officer's decision or the Authority's determination. The Notice to Vacate must be in writing and specify that if the tenant fails to quit the premises by the date specified in the Notice, which date shall be not less than one calendar month from the date of the mailing or other delivery thereof, appropriate eviction action will be brought against the tenant and he/ she may be required to pay court costs and attorney's fees.

**All matter incorporated by reference in Subdivision B of the Grievance Procedures for Federally-Aided Projects is set forth at length herein.*



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Chapter 12: Grievances

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Chapter 12: Grievances ▼

A. Overview

NYCHA's informal hearings and grievance procedures are available to residents who dispute a NYCHA action or failure to act in accordance with the resident's lease. The grievance procedures are also available to applicants and residents to challenge NYCHA's application of any rule or regulation that adversely affects an applicant's or resident's rights, duties, welfare, or status.

Grievances will be handled in accordance with NYCHA's Grievance Procedures as outlined below.

B. Key Acronyms

- CRD: Chronic Rent Delinquency
- HUD: U.S. Department of Housing and Urban Development
- NPHOI: Non-Public-Housing Over-Income
- NYCHA: New York City Housing Authority
- RFM: Remaining Family Member
- SAVE: Systematic Alien Verification for Entitlements
- USCIS: United States Citizenship and Immigration Services
- VAWA: Violence Against Women Act

C. Hearing Officer

The Hearing Officer is responsible for conducting impartial hearings and making dispositions. These decisions are binding on NYCHA unless the members of NYCHA find that they are contrary to law. The Hearing Officer shall be an impartial disinterested attorney admitted to practice before the state of New York.

D. Grievances for Residents

Grievances concerning the obligations of the resident or NYCHA under the provisions of the lease are processed and resolved in accordance with NYCHA's Public Housing Grievance Procedure. This procedure also applies to Non-Public Housing Over Income (NPHOI) residents who have signed the NPHOI lease with NYCHA. Refer to Chapter 8(h), Over-Income Residents, for more information.

i. Grievance Procedure

1. *Scope of Procedure*

The Grievance Procedure is concerned with individual grievances between the resident and NYCHA. Policy questions, class grievances, inter-resident conflicts, personal injury, damage claims or commercial residents are excluded. Also excluded are grievances involving termination of tenancy proceedings based on Non-Desirability, Breach of Rules and Regulations, Chronic Breach of Rules and Regulations, Chronic Rent Delinquency, Non-Verifiable Income, Assignment or Transfer of Possession and Misrepresentation. These grounds are covered in Chapter 11, Lease Terminations.

All residents are entitled to use the Grievance Procedure except:

- Residents to whom 30-day Vacate Notices have been sent after a decision by a Hearing Officer; and
- Residents against whom judgments of possession have been entered and who have not been reinstated as residents.

2. *Submission of a Grievance*

- A resident can submit a grievance via NYCHA Self-Service Portal or in person with property management staff.

3. *Grievance Types*

A resident can submit a grievance for any of the following:

- Rent;
- Denial of request to add an additional member to the household;
- Denial of a transfer request;
- Denial of a replacement Lobby Door Key;
- Other - Any matter in which a resident is dissatisfied with the decision of a property manager or NYCHA.

4. *Rent Grievances*

- Rent Grievance
 - When a resident submits a grievance to dispute their rent, NYCHA staff must not do the following:
 - Initiate non-payment proceedings against the resident;
 - Proceed with existing non-payment proceedings in Landlord and Tenant Court against the resident, unless the monies sought in the non-payment proceeding result from the resident's failure to make rent payments during a period not covered by the rent grievance. If the non-payment does not result from the resident's failure to make rent payments during a period covered by the rent grievance, the case does not need to be adjourned in Landlord and Tenant Court; or
 - Initiate administrative proceedings for the sole charge of Chronic Rent Delinquency (CRD). If the resident meets the criteria for another administrative charge, NYCHA staff will move forward with those

administrative charges. If there is an existing administrative charge of CRD in combination with another charge or charges, NYCHA will amend the charge(s) to remove CRD and continue with other administrative charges against the resident.

- o Once a decision has been made on a rent grievance, NYCHA proceeds as follows:
 - If the rent grievance is sustained (i.e., property management agrees with the grievance claim) following an informal conference, an interim recertification is to be processed to adjust the rent and apply applicable credit. If, after the credit is applied to the resident's account, rent is still owed by the resident, property management staff can resume or initiate non-payment court proceedings against the resident. If the rent grievance is sustained at the property management level and, after taking into consideration the months the resident may have been late with rent payments due to incorrect rent, it is still determined the resident meets the criteria for CRD, property management staff may initiate or resume CRD administrative proceedings against the resident; or
 - If the rent grievance is denied (i.e., property management does not agree with the grievance claim) at the property management level following an informal conference, and a resident is not satisfied with the explanation of the decision provided, NYCHA Form 042.780A, Tenant Grievance-Property Management Notice to Tenant-Grievance Not-Sustained, must be completed and signed by NYCHA property management staff and the resident. Signing of this form indicates that the resident wants to participate in an impartial hearing with the Office of Impartial Hearings. The case will be sent for further administrative review and referral for an impartial hearing. Once a decision has been made by the Impartial Hearing Officer, property management staff can resume or initiate non-payment court proceedings or CRD administrative proceedings against the resident, if applicable.

- Informal Conference with Property Manager

Within 30 calendar days of receiving the grievance claim, the property manager will schedule an appointment for an informal conference with the resident to discuss the claim. If the resident appears for the scheduled informal conference, the property manager conducts the informal conference, and the resident may submit any additional supporting documents as proof or give oral statements to support their claim.

If a decision cannot be made on the day of the informal conference, the property manager will make a decision on the grievance claim within 14 calendar days of the informal conference. The property manager will inform the resident verbally and by giving them NYCHA Form 042.780, Tenant Grievance - Property Management Notice to Tenant - Grievance Sustained, if their claim has been granted and NYCHA Form 042.780A, Tenant Grievance-Property Management Notice to Tenant - Grievance Sustained if their claim is denied.

- Resident Grievance Sustained

Property management staff will complete any corresponding follow-up action (ex: a rent grievance that is sustained should be followed up with an interim for rent).

- Appeal of Property Manager Decision (Request for further Administrative Review)

If a resident is not satisfied with the decision of the property manager, they can request an appeal. To request an appeal, the resident completes the Resident Section of NYCHA Form 042.780A, Tenant Grievance - Property Management Notice to Tenant-Grievance Not - Sustained, or NYCHA Form 042.780, Tenant Grievance - Property Management Notice to Tenant-Grievance Sustained.

- Resident Fails to Appear for their Scheduled Informal Conference

If a resident fails to appear for their scheduled informal conference with the property manager, the property manager makes a decision based on the information and documents available to the property manager at that time.

If the resident grievance is not sustained based on the information the property manager has available, the property manager sends the resident NYCHA Form 042.780A, Tenant Grievance - Property Management – Notice to Tenant - Grievance Not Sustained. If this notice is hand delivered or slipped under the door, the resident has 10 business days to appeal the decision. If this notice is mailed to the resident, they have thirteen (13) business days to appeal the decision. If the resident does not appeal within the mentioned time frames the property manager's decision remains in effect and the grievance is not sent for further administrative review.

If a resident does not appear for the informal conference, but the property manager is able to sustain (approve) the grievance based on information and documents available to the property manager, the property manager sustains (approves) the grievance claim and mails NYCHA – Form 042.789A, Tenant Grievance - Property Management Notice to Tenant - Grievance Sustained to the resident. Property management staff will complete any corresponding follow-up action (ex: a rent grievance that is sustained should be followed up with an interim recertification for rent).

5. Remaining Family Member (RFM) Claimant Grievance

A RFM claimant is an individual who seeks to succeed to the public housing lease after a head of household has died or vacated. .

If within 30 calendar days of NYCHA becoming aware that the resident has died or vacated an apartment, and if NYCHA does not have possession of the apartment, property management staff will hand deliver or slip under the door NYCHA Form 040.342, Remaining Family Member Grievance Claim. The RFM claimants should contact property management staff within 14 calendar days of receiving this form.

Authorized household members can submit NYCHA Form 040.342, Remaining Family Member Grievance Claim online via NYCHA Self-Service Portal or in person to property

management staff. An RFM claimant who is not an authorized household member can only submit their RFM grievance claim to property management staff in person..

- Use and Occupancy

RFM claimants are required to pay use and occupancy while their grievance claim is pending. Use and occupancy is determined based on the verified income of the RFM claimant. Property management staff compare the last rent set for the previous head of household with the rate based on the verified income of the RFM claimant. The use and occupancy payment is the lower of the two amounts.

If the RFM claimant reports \$0 income, they are given NYCHA Form 040.481, Zero Income Questionnaire to complete.

RFM Claimant Informal Conference with Property Manager

Within 30 calendar days of the RFM claim being submitted by the RFM claimant, the property manager schedules an informal conference with the RFM claimant to discuss the claim. If the RFM claimant appears for the scheduled informal conference, the property manager conducts the informal conference, and the RFM claimant may submit any additional supporting documents as proof or give oral statements to support their claim.

If a decision cannot be made on the day of the informal conference, the property manager makes a decision on the RFM grievance claim within 14 calendar days of the informal conference. The property manager calls the RFM claimant in to provide them with a written decision by giving them either NYCHA Form 042.789, Remaining Family Member (RFM) Grievance: Property Management Notice to RFM Claimant - Grievance Sustained, if their claim has been granted and NYCHA Form 042.789A, Property Management Notice to RFM Claimant - Grievance Not Sustained, if their claim has been denied.

- Appeal of Property Manager Decision (Request for Further Administrative Review)

If a RFM claimant is not satisfied with the decision of the property manager, they can request an appeal. The RFM claimant can request an appeal by completing the Grievant Statement Section of NYCHA Form 042.789A, Property Management Notice to RFM Claimant - Grievance Not Sustained.

The property manager must also sign NYCHA Form 042.789A, Property Management Notice to RFM Claimant - Grievance Not Sustained, as a witness after the RFM claimant has signed the form. If the RFM claimant disagrees with the explanation provided by property management and requests an appeal, their grievance is sent for further review, and they have the opportunity to participate in an informal conference with the Borough Designee or Impartial Hearing with the Impartial Hearing Officer. If the grievant appears for the informal conference but refuses to sign form 042.789A, property management staff has to contact the Law department to initiate a licensee action.

Within three business days of the property manager making a decision on a RFM grievance claim:

- If the RFM grievance claim is sustained (approved) the manager will contact the RFM and schedule an appointment for lease signing; and
- If the RFM grievance claim is not sustained (disapproved), and the RFM claimant requested an appeal, the claim will be sent for further administrative review to a Borough Designee or to an Impartial Hearing Officer.

RFM grievance claims denied due to the following reasons are not entitled to a hearing before an Impartial Hearing Officer:

- Transfer of Tenancy

Any occupant of a NYCHA apartment who remains in the original apartment when a head of household transfers to another NYCHA apartment or an apartment subsidized by NYCHA through the Section 8 program.

- Duplicate Tenancy

Any occupant of a NYCHA apartment who is a resident or authorized occupant of another NYCHA apartment or of any other U.S. Department of Housing and Urban Development (HUD) administered public housing apartment, or a recipient of a Section 8 subsidy.

- Termination of Tenancy

Any remaining occupant of a NYCHA apartment at the time the tenancy is terminated, except:

- If the termination of tenancy against the former resident was based on the former resident's failure to occupy the apartment; or
- If the termination of tenancy "bifurcated" the lease under the Violence Against Women Act (VAWA), terminating the tenancy or occupancy rights of the abuser(s) and leaving intact the tenancy/occupancy rights of the other family members. Refer to Chapter 2(g): Violence Against Women Act (VAWA), for details on bifurcation and on remaining family member rights once the abuser's rights have been terminated.

- Permanent Exclusion

Any member of a resident family who was permanently excluded from the household before the resident moved out or died.

- Resident Employee/Senior Resident Advisor/Resident Police Officer

Any Resident Employee, Senior Resident Advisor, or Resident Police Officer and their family who occupies a NYCHA apartment with a Resident Employee, Senior Resident Advisor, or Resident Police Officer lease only, and not a public housing lease.

- RFM Claimant Appeal to Borough Management

If the RFM claimant requests an appeal after the denial of their RFM grievance due to the reasons above, property management staff will send the RFM grievance claim to the respective Borough Designee for review.

Within 14 calendar days of the RFM Grievance claim being assigned to the Borough Designee, the Borough Designee schedules an informal conference with the RFM claimant. At the informal conference the RFM claimant can submit any additional documents as proof and give oral statements to support their claim. If the Borough Designee agrees with property manager decision to deny the RFM Grievance claim for the reasons listed above, the Borough Designee verbally informs the RFM claimant of their agreement with the property manager denial of their RFM grievance claim and provides the RFM claimant with NYCHA Form 040.302D, Remaining Family Member (RFM) Grievance: Borough Management Department Dismissal. There is no appeal from the decision of the Borough Designee.

If the Borough Designee disagrees with the property manager's decision and determines:

- The RFM grievance claim should be denied due to a reason that should be reviewed by an Impartial Hearing Officer, the RFM Grievance is sent for further administrative review by an Impartial Hearing Officer; or
 - The RFM claimant does qualify for tenancy, the RFM Grievance is sent back to the property manager. The property manager contacts the RFM claimant and provides them NYCHA Form 042.789, Remaining Family Member (RFM) Grievance: Property Management Notice to RFM Claimant - Grievance Sustained and conducts a lease signing.
- RFM Claimant Fails to Appear for their Scheduled Informal Conference

If an RFM claimant fails to appear for their scheduled informal conference with the property manager, the property manager will make a decision based on the information and documents available to them at that time.

If the RFM grievance is sustained (approved) the property manager will contact the RFM claimant and schedule an appointment for lease signing.

If the RFM grievance is not sustained (disapproved) the property manager must contact NYCHA Law Department for guidance to regain possession of the apartment in Landlord and Tenant Court.

6. *Document Reproduction*

NYCHA gives the grievant the opportunity to examine before the hearing and, at the expense of the grievant, to copy all documents, records and regulations of the Authority that are relevant to the hearing. At the hearing, NYCHA may not rely on any document not made available to the grievant.

7. *Formal Hearing with Impartial Hearing Officer*

The grievance (brought by resident or RFM claimant) will be heard at the Office of Impartial Hearings before a Hearing Officer. The Hearing Officer's decision will be binding on NYCHA. The resident or RFM claimant has the right to be represented by an attorney or other person they choose and may present evidence and arguments in support of the grievance. If the resident, RFM claimant, or NYCHA fails to appear at a scheduled hearing, the Hearing Officer may make a determination to postpone the hearing for no more than five (5) business days or may make a determination that the party has waived their right to a hearing. Both the resident or RFM claimant and NYCHA must be notified of the determination by the Hearing Officer. A determination that the resident or RFM claimant has waived the resident's or RFM claimant's right to a hearing will not constitute a waiver of any right the resident or RFM claimant may have to contest NYCHA's disposition of the grievance in an appropriate judicial proceeding.

8. *Decision Of the Hearing Officer and Grievance Hearing Records*

The Hearing Officer will prepare a written decision. Copies of the decision will go to the RFM claimant or resident, the resident folder, and to a file at Central Office.

All grievance hearings, informal and formal, will require a summary or log including the names of participants, date, the nature of the proposed disposition of the grievance, and specific reasons for the decision.

A written notification specifying the time, place, and the procedures governing the hearing must be delivered to the grievant and the appropriate NYCHA staff that need to be made aware of the grievance and the reason for decision.

NYCHA maintains a log of all Hearing Officer decisions and makes that log available upon request of the Hearing Officer, a prospective complainant, or a prospective complainant's representative. Property management staff will complete the required follow-up action based on the decision of the Impartial Hearing Officer.

Click the dropdown to select a chapter to read. You are currently viewing:

Chapter 12: Grievances



Effective: 1/1/24

Last Revision: 12/15/23

Exhibit B

calculate the phase-in amount for Year 1, as illustrated below. Households will not pay more than 30% of their adjusted gross household income for rent.

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the standard TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the standard TTP
- Year 5 AR and all subsequent recertifications – 100% (Full standard TTP)

Once the calculated PBV TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full TTP from that point forward.

5. Public Housing Family Self Sufficiency (PH-FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) Programs

NYCHA does not have PH-FSS participants but residents will be able to enter into the Housing Choice Voucher (HCV) FSS program after conversion. Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future public housing ROSS-SC grants, nor will its residents be eligible to be served by future public housing ROSS-SC grants.

6. Resident Participation and Funding

Residents will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding in accordance with the Notice. The owner must provide \$25 per occupied unit annually for resident participation, of which at least \$15 per occupied unit shall be provided to a legitimate tenant organization at the covered property. These funds must be used for resident education, organizing around tenancy issues and training activities.

7. Resident Procedural Rights

At a minimum, residents will have the following procedural rights, which NYCHA has expanded by incorporating the RAD Guiding Principles for the benefit of residents.

a. Termination Notification

HUD has incorporated additional termination notification requirements to comply with section 6 of the U.S. Housing Act of 1937 as may be amended (Act) for public housing

projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, the termination procedure at a minimum for RAD conversions to PBV will require that the owner provide adequate written notice of termination of the lease which shall be:

- i. A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction;
 - ii. Not less than 14 days in the case of nonpayment of rent; and
 - iii. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
- b. Grievance Process

HUD is incorporating additional resident procedural rights to comply with the requirements of Section 6 of the Act.

For issues related to tenancy and termination of assistance, PBV program rules require the owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to an owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - For any hearing required under 24 CFR § 982.555(a) (1) (i)-(vi), NYCHA as the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e) (4) (i).
 - For any additional hearings required under RAD, the owner will perform the hearing.
- ii. An informal hearing will not be required for class grievances or for disputes between residents not involving the owner or contract administrator.
- iii. The owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- iv. The owner provides opportunity for an informal hearing before an eviction.

4. LHD may deny the request if there is a pending termination action against the family.

C. Overcrowding

If the addition of the proposed household member would create an overcrowded condition in the apartment, LHD shall grant the request. For households with Project-Based Section 8 Assistance (PBV), the household will be required to right size in accordance with LHD PBV right sizing and transfer policies and procedures. A household will be notified of their requirement to right size during the annual recertification process. A household that adds a member via an interim recertification will be notified of the right sizing requirement during their next annual recertification. For households with tenant-based Section 8 assistance, the household may request a transfer voucher in accordance with LHD transfer policies and procedures to transfer to an appropriate-sized unit.

D. Voucher Payment Standard

Staff will not change the voucher payment standard until the next scheduled annual recertification.

E. Notification

LHD will provide the HOH a written decision on the request to add household members. The Owner will also receive a copy of these notices.

F. Household Member Removal

Requests to remove a household member must be made in writing by the Voucher Holder. The Voucher Holder may submit either a signed NYCHA Affidavit of Income – Section 8 – Head of Household, NYCHA Section 8 Request for Interim Change – Addition to Household, or a written statement.

G. Succession to the Voucher

Requests to remove a Voucher Holder/HOH who has vacated/plans to vacate the unit and surrender the voucher must be made in writing by the current Voucher Holder/HOH. If the Voucher Holder/HOH is deceased, then the remaining household member(s) must submit a copy of the death certificate within 30 days of the date of the death. The remaining household member identifying him/herself/themselves as the next HOH must also submit a signed NYCHA Affidavit of Income – Section 8 – Head of Household, NYCHA Section 8 Request for Interim Change – Addition to Household, or a written statement. The remaining household member(s) must be eligible to continue receiving subsidy.

The Remaining Family Member must also meet all the following requirements:

1. The individual is an active household member with permanent status at the time the head of household dies or otherwise ceases to be a member of the assisted household.
2. The individual has the legal capacity to sign a lease and other tenancy documents. If the individual has not reached the age of majority under New York law or is mentally incapacitated, the individual must have an acceptable guardian. A guardian is acceptable if he/she/they meets all the following conditions. He/she/they must:

- a) Be the parent of the individual or a relative or other responsible adult who is willing and able to care for the individual.
- b) Have reached the age of majority and may not be mentally incapacitated.
- c) Submit a court order or written permission of the parent or other legal guardian confirming his or her status as the legal guardian.
- d) Pass a Criminal Background Check.
- e) Be willing to sign the lease and other tenancy documents on behalf of the minor or mentally incompetent person.
- f) Be willing to continue as guardian during the duration of the subsidized tenancy until the minor reaches the age of majority or if the individual remains mentally incapacitated.

Note: If the remaining household members do not elect a new head-of-household, LHD will default to the eldest, eligible household member.

H. Challenges to Denials of Subsidy Succession

A Remaining Family Member (RFM) may challenge the denial of succession to the HOH's voucher by requesting an informal conference. The informal conference will be conducted by a Leased Housing Department employee at the title of Assistant Manager or higher. If the RFM fails to appear for the informal conference, the Leased Housing Department employee conducting the informal conference shall review the documents attached to the RFM service request and issue a written determination. Within 30 days of the informal conference (or the review of the documents in cases where the RFM fails to appear), the Leased Housing Department shall issue a written determination notifying the RFM of the outcome of the informal conference.



HOMELESS SERVICES UNITED

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**Homeless Services United's Testimony for the New York City Council Public Housing
Committee Hearing**

March 24, 2026

My name is Victoria Leahy, and I am the Director of Policy and Planning at Homeless Services United (HSU). HSU is a coalition representing over 55 mission-driven, homeless service providers in New York City. HSU advocates for the 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 Services United promotes effective solutions to end the crisis of homelessness in New York City. We thank the committee for the attention to the needs of New Yorkers living in public housing.

Today we would like to highlight our concern about NYCHA's plan to address the 5,500 Emergency Housing Vouchers that will soon run out of funding and jeopardize the housing stability of thousands of New Yorkers.

Last year, HUD announced the end of the funding timeline for the Emergency Housing Voucher (EHV), and no new funding has been announced. EHV recipients include 8,300 children and will impact the income of 5,700 landlords. When the Emergency Housing Voucher was created, 8,000 NYC households received the voucher, including almost 1,200 survivors of domestic violence seeking housing assistance, and 500 survivors in domestic violence shelters. NYCHA is responsible for the bulk of these vouchers.

While we are pushing our federal officials to take action and restore funding, we are concerned about the fact that NYCHA has yet to establish a plan of action to transfer these voucher holders to other subsidies or protect them from eviction and homelessness. We understand the tight budget constraints that NYCHA may be facing and that they are looking for alternative funding sources, but if a plan is not established, 5,500 households will be at jeopardy of losing housing.

New York City's Homebase program is already at capacity. As a result, wait times have increased for critical Homebase services like help with eviction prevention, emergency rental assistance, and obtaining benefits. Some HSU Homebase providers report exceeding their deliverables by 113% with months still left in the contract year – yet they receive no increased funding from HRA. Homebase providers will not be able to assist 5,500 households based on their current capacity. To ease this burden, we need to increase the budget for Homebase by \$38.3 million to a total of \$100 million to right size

Homebase contracts, so Homebase service providers can meet the increasing needs of the city.

We urge the City Council to work with NYCHA officials to protect the housing status of their constituents.

We look forward to working with the City Council to ensure that this year's budget delivers for all New Yorkers. If you have any additional questions, please contact me at vleahy@hsunited.org.



**Testimony of Alia Soomro, Deputy Director for New York City Policy
New York League of Conservation Voters
City Council Committee on Public Housing
FY27 Preliminary Budget Hearing
March 24, 2026**

My name is Alia Soomro and I am the Deputy Director for New York City Policy at the New York League of Conservation Voters (NYLCV). NYLCV is a statewide environmental advocacy organization representing over 30,000 members in New York City. Thank you, Chair Banks, and members of the Committee on Public Housing for the opportunity to comment.

The New York City Housing Authority (NYCHA) has been long-neglected due to significant underinvestment and mismanagement. Chronic issues such as lack of heating and hot water, mold, lead paint, rats and other pests, and little to no recycling access have plagued NYCHA residents for years. Compounding this, NYCHA residents are disproportionately impacted by climate change. Many campuses are located in flood zones, exposing residents to sea level rise, coastal storm surge, and inland flooding. Many NYCHA campuses also lack access to air conditioning, leaving residents, especially seniors, more vulnerable to heat-related illnesses and death during extreme heat events. **NYLCV stands with advocates and elected officials calling for increased funding for long-needed building upgrades and public health improvements, as well as significant funding to address the impacts of climate change.**

As advocated in NYLCV's recently-released [2026 NYC Policy Agenda](#), the City must prioritize safeguarding the health and safety of NYCHA residents by (though not limited to) eliminating lead-based paint, mold, and pests from NYCHA residences, all of which contribute to adverse health impacts such as asthma and lead poisoning. We echo calls by the New York City Coalition to End Lead Poisoning (NYCCELP) advocating for sufficient funding for NYCHA's [Lead-Safe Housing Policy](#) (Lead-Based Paint Abatement and Dust Wipe Sampling), [XRF Testing Initiative](#), and the [Team for Enhanced Management Planning and Outreach \(TEMPO\)](#).

As stated in the [Public Housing Committee Report](#), the Preliminary Capital Plan includes a reallocation of \$71 million from the General Construction Fund to support lead, mold, and asbestos work in accordance with the HUD Agreement Pillar areas from 2019. Of the \$71 million, \$7.7 million in Fiscal 2026 and \$13.3 million in Fiscal 2027 (\$21 million total) will go towards lead abatement. NYCHA has made progress in the number of lead abatements, currently abating approximately 400 units per month, resulting in over 17,000 units abated. NYCHA estimates that half of its portfolio is now completely lead-free.

Relatedly, NYCHA should explore opportunities to pair building capital repairs such as elevator improvements and mold and lead abatement with energy efficiency retrofits and zero-emission heating, cooling, and cooking systems installation. NYLCV appreciates that [the Mamdani Administration will deliver modern heating and cooling to 712 homes as part of the city's "Clean Heat for All" initiative](#). NYLCV is supportive that the Mayor's Preliminary Capital Plan includes \$38.4 million additional funding to facilitate the installation of heat pumps at the Beach 41st Street development in Far Rockaway, Queens. The project includes minor electrical upgrades as well as window replacements for higher performance alternatives.

When it comes to Local Law 97 and other sustainability measures, we underscore the importance that NYCHA is sufficiently funded in order to continue implementing its [Sustainability Agenda](#). The City must do everything in its power to ensure that NYCHA campuses are on track to meet emissions reduction targets and procurement commitments for renewable energy, such as reducing greenhouse gas emissions by 80 percent by 2050. NYLCV also urges NYCHA to explore the possibility of investing in thermal energy networks to decarbonize campuses to aid in reaching these emissions reduction goals. The City also must work with State and Federal agencies to identify sustainable funding streams to make NYCHA campuses resilient to climate hazards such as sea level rise, storm surges, and extreme rainfall. This includes protecting mechanical, electrical, and plumbing infrastructure, floodproofing buildings, and installing new, more efficient boilers and back-up generators.

NYCHA should continue working with DEP to fund and improve NYCHA's stormwater management and implement green infrastructure projects such as permeable pavement, porous asphalt, porous concrete, rain gardens, and subsurface storage systems. Funding should also be prioritized for mitigating extreme heat for NYCHA residents. In addition to increasing and maintaining NYCHA's tree canopy and comprehensively retrofitting NYCHA buildings, there should be funding allocated to restart the [Get Cool NYC Program](#), which provided air conditioners, free of charge, to senior residents who are 65 or over or have a qualifying underlying condition. This program [helped seniors](#) who participated less likely to report feeling sick from the heat compared to those who didn't participate in the Get Cool NYC Program. To complement this program, the City should also identify funding sources to help qualifying residents in this program with their summer utility bills. NYLCV urges the City to provide long-term funding for composting and recycling for all NYCHA campuses, especially as the City is implementing the residential curbside organics program. An organic waste collection program that leaves out NYCHA cannot be called a citywide or universal program.

Lastly, as with other City agencies, NYLCV calls on the City to prioritize long-term hiring and staffing at NYCHA. With historic underinvestment and constant quality of life issues, NYCHA residents deserve significant funding and investment not only to address existing public health and building maintenance problems but to prepare for the impacts of climate change.

Thank you for the opportunity to comment.

COMMITTEE ON PUBLIC HOUSING TESTIMONY CONCERNING FUNDING

Tuesday March 24th hearing room 1

We are fighting for our lives and the future of public housing in New York City, and that fight begins with a clear demand: the City must commit the \$662 million directly into Section 9 public housing. Not PACT, not privatization schemes, but Section 9 is the only structure that fully protects tenant rights and keeps housing permanently public.

What we are witnessing today is not accidental. Landlords and developers have learned from one another, and residents are paying the price. Repairs take longer, vendors fail to deliver, and living conditions decline, all while accountability disappears. NYCHA, which should be overseeing these processes, has failed to provide meaningful oversight. We have already seen this pattern play out in cases where companies cycle through developments without consequence, continuing to profit while residents deal with the fallout. This is not accountability it is a revolving door.

At the same time, the City continues to claim it supports social housing, while actively shifting it into private hands. That contradiction is not lost on the residents who have built and sustained communities like Chelsea. We are the people who stayed through disinvestment, through neglect, through decades when public housing was ignored. Now, at Fulton and Elliott-Chelsea, we are being asked to accept a plan that would consolidate us into three buildings while handing over the majority of our land to so-called “affordable housing” that is not affordable to us.

When “low-income housing” is defined as serving households earning \$56,000 to \$90,000 a year, we must ask: affordable to whom? And what will that range look like in ten or twenty years? These policies are not designed for the residents who live here now.

We must also confront how these plans are being financed. Project-Based Section 8 is being used to fund the demolition of public housing. Yet Section 8 itself is not a stable system. Federal funding for the program has been repeatedly threatened, and the expiration of the Emergency Housing Voucher program has already shown how fragile these supports are. NYCHA has issued vouchers without long-term guarantees to sustain them, placing residents into an increasingly uncertain system. Moving people out of permanent public housing under Section 9 and into a precarious, privately controlled system is not a solution—it is a transfer of risk onto tenants. In Gothamist the New York City Housing Authority, which runs the program for another roughly 5,500 households, says its months-old plan to replace the expiring subsidies with traditional Section 8 vouchers has fallen through. “Unfortunately, NYCHA no longer has the funding required to accomplish this transition,” said agency spokesperson Andrew Sklar. Sklar said the federal Department of Housing and Urban Development, or HUD, denied NYCHA’s request to issue new vouchers last month. NYCHA has no concrete plan to replace rental assistance for the thousands of people set to lose it.

Alongside this structural shift, residents are experiencing direct pressure. Companies like Related Affordable Management have engaged in aggressive outreach tactics—knocking on doors, sending repeated texts and emails—targeting tenants in Phase 1. Residents have already seen what happened at Fulton and Chelsea Addition, and the same patterns are emerging again. This is not engagement; it is harassment. It is compounded by broader pressure from Housing Opportunities Unlimited, NYCHA community planners, and officials who continue to push this process forward despite clear resident opposition. We have collected in 1000 signatures stating opposition to demolition.

The reality is that the driving force behind these decisions is not the condition of the buildings, but the value of the land. Chelsea is one of the most valuable areas in the city, and that value is shaping policy decisions. Even in public discussions, when Alexa Avilés asked about the metrics being used, the response from Simon Kawinsky pointed back to land value. This is not about preservation; it is about real estate.

This becomes even clearer when we look at who benefits. The City claims to stand for economic justice, yet it continues to subsidize billion-dollar developers like Related Companies, a corporation valued at roughly \$60 billion. This is the same company that leveraged NYCHA developments in East and West Harlem through the EB-5 program to help finance the #7 train. Residents in Chelsea are now being asked to accept a similar role in financing development that does not serve them.

At the same time, the City claims NYCHA is underfunded, yet thousands of units sit unused. More than 6,000 apartments remain vacant, alongside over 3,000 non-dwelling units. This represents lost rent and lost subsidy resources that could and should be reinvested into public housing. Instead of addressing this inefficiency, the focus remains on privatization.

The Citywide Council of Presidents (CCOP) states that there must also be a structural commitment to how public housing is funded. Under Section 254 of the New York City Charter Section 254, the City has the authority to establish and maintain recurring line items in the Executive Budget, yet NYCHA does not have a permanent, protected funding stream dedicated to Section 9 public housing. At the State level, under New York State Constitution Article VII, there is likewise nothing preventing the creation of a dedicated appropriation or statutory fund to support public housing on a recurring basis. The issue is not a lack of legal authority it is a lack of political will. We are calling for the creation of a permanent, protected revenue stream at both the City and State levels, tied to a reliable source such as the repeal of the stock transfer tax rebate, and legally restricted to capital repairs and preservation of public housing (section 9). These funds must not be diverted into privatization efforts such as the Trust or PACT, but instead must be directed toward real improvements in Section 9 housing. Public housing should be funded as essential infrastructure, with the same consistency and protection as other critical public investments.

New York already has the resources to fully fund public housing the issue is not scarcity, but political will. Every year, the State collects billions through the stock transfer tax and then rebates nearly all of it back to Wall Street, instead of investing in critical public needs like housing. As advocates such as Phil Schenk have highlighted, ending this rebate could generate between \$13 and \$17 billion annually more than enough to address NYCHA's capital needs and preserve Section 9 public housing.

There must also be a full accounting of developments that have undergone infill projects. Residents deserve transparency on where that funding has gone, how it has been used, and whether it has directly benefited the development it was generated from. If those funds were not reinvested into the originating development, then both the principal and any accrued interest should be returned and dedicated to that community's capital needs. Public land was leveraged to generate that value, and it is only right that the residents of those developments see the benefit through real repairs, improvements, and reinvestment in their homes.

Funding alone, however, is not enough. There must be strict accountability for how funds are spent. Public money must not be diverted into structures like the Trust that move housing further away from public control. Instead, funding must be directed toward real capital improvements—repairs, infrastructure, and the rehabilitation of existing units. NYCHA should not be in a position to dictate spending priorities to elected officials without transparency or oversight. Public funding must serve the public, not private interests.

Residents are also being asked to accept serious environmental risks without clear information. There have been discussions about designating the area as a brownfield site, potentially exposing residents to long-term remediation conditions over a period of 10 to 20 years. Yet at a public meeting, representatives from Essence Development stated that there were no environmental issues. These contradictions raise serious concerns, particularly given the known presence of industrial infrastructure and the reality that there is no safe level of lead exposure. Residents cannot be expected to accept these risks without transparency and accountability.

Despite all of this, residents are told they are “part of the process.” But participation without power is not meaningful engagement. Being forced into a process that residents fundamentally oppose is not democracy it is control. Officials who speak out against authoritarianism cannot, at the same time, ignore the voices of the very communities they claim to represent.

The residents of NYCHA are diverse Black, Brown, immigrant, white, Asian, women, working families. We represent the full fabric of New York City. We do what this city claims to value: we build community, we live together, and we make it work. Yet we are the ones being displaced.

Too often, NYCHA residents are spoken about as symbols used to represent resilience or diversity, while our actual voices are ignored. When public housing is harmed, it is not an abstract policy failure; it is a direct harm to the people whose labor sustains this city. We are the workers, caregivers, and families who make New York function, even as we remain invisible in its politics.

This is why legislation like Senate Bill S4315, introduced by Leroy Comrie, is so important. It would provide real oversight, require public reporting, and ensure accountability for NYCHA's operations. These are not optional reforms; they are necessary protections.

Ultimately, this fight is about more than funding or policy mechanisms. It is about whether public housing will remain public. It is about whether long-standing communities will be preserved or displaced. And it is about whether the City will recognize the humanity, labor, and rights of the people who have sustained it for generations.

We are of immense value. I have never felt so valuable as myself, and community is being enslaved to Related. Who will not forgive rent arrears and will evict. Tila, from Related Affordable stated. We are not asking to be saved. We are demanding that our homes remain public, that our communities remain intact, and that our voices are not only heard, but acted upon.

The future of public housing and of this city depends on it.

Renee Keitt, President, Elliott Chelsea Houses



3/24/2026

**TESTIMONIAL:
INNER CITY GREEN TEAM ECONOMIC AND ENVIRONMENTAL DEVELOPMENT**

**PUBLIC HEARING:
NEW YORK CITY COMMITTEE ON PUBLIC HOUSING**

**RE: RECYCLING OUTREACH/EDUCATION, WASTE DIVERSION, RAT MITIGATION,
REMOVING ON-SITE OPERATIONAL BARRIERS, EXPANDING RESIDENTIAL
RECYCLING PROGRAM ON NEW YORK CITY HOUSING AUTHORITY CAMPUSES**

Greetings To All,

Thank you for the invitation to testify.

I am Brigitte Charlton-Vicenty, Founder and CEO of Inner City Green Team Economic & Environmental Development (ICGT), and a life-long NYCHA resident.

THE PROBLEM

1 in 17 New Yorkers live in New York City Housing Authority (NYCHA) developments. Yet, nearly four decades after the 1989 NYC recycling law was passed, NYCHA residents continue to be excluded from equitable access to recycling services due to outdated infrastructure, inconvenient bin placement, capacity challenges within the Authority, and chronic underinvestment in sustainability solutions. Like other New Yorkers, NYCHA residents need and deserve access to NYC recycling programs to successfully tackle the city's waste problems in the country's largest public housing community.

NYCHA communities have some of the highest unemployment rates and are in critical need of jobs—56% of all working-age residents do not report income from employment. According to estimates, as many as 100,000 residents are without jobs.

BACK STORY

In 2006, I thought I was doing my civic duty as a law-abiding citizen when placing my recyclables in the designated bins at my development until I witnessed my recyclables being thrown away with the garbage. I was shocked to learn that all my efforts over the years were in vain, because recycling at NYCHA was nonexistent and had not complied with the NYC Recycling Law established 30 years earlier. After my revelation, I began taking my recyclables outside of NYCHA to be recycled, but my lone efforts were just a drop in the bucket. I knew more had to be done.

I had a vision to create an opportunity to establish a recycling program and submitted a proposal to the Authority when I came across a NYCHA posting urging residents to get involved with then Commissioner Lopez's "Green Agenda". Consequently, I activated the Resident Green Committee (RGC) at Mott Haven Houses with the vision of fulfilling the Commissioner's agenda to "help green public housing."

Towards that end:

- I held public meetings and events to raise awareness and educate NYCHA residents about recycling and energy efficiency.
- Conducted door-to-door surveys to ascertain residents interested in learning and participating in a recycling program.
- Partnered with Mother's On The Move and organized a recycling rally to mobilize residents around the issue
- Created the Right to Recycle Collection Initiative, which proposed a unique solution for NYCHA to comply with the recycling law.

THE PILOT

In 2018, ICGT won the international competition, **NYCx Co-Lab Challenge: Zero Waste in Shared Space**, demonstrating the potential of resident-led solutions. During the six-month pilot in Brownsville, Brooklyn, recycling rose from 0% to 8% in four months, with over **sixteen tons** of recyclables diverted. Although the pilot proved to be successful, no further support was offered from the long list of City agencies that sponsored the competition. Only through my crowdfunding efforts, operations continued for an additional year, proving the model's scalability and expandability.

For over 14 years, ICGT's mission has focused on cultivating climate awareness and waste equity on (NYCHA) public housing campuses. My [non-profit] organization has been committed to protecting the environment, advancing residents' rights to recycle, and transforming the lives of residents through green job training and paid work that can lead to a lifetime of employment and civic engagement.

ICGT's environmental justice service model directly addresses the disproportionate environmental burdens in low-income communities and empowers residents to participate in sustainability on a hyper-local level in **every age group**.

One of our many accomplishments includes earning formal recognition that helped inform legislation under the NYS Climate Leadership and Community Protection Act (CLCPA) and New York City's Local Law 49 -2017 (LL49), sponsored by then-Sanitation Committee Chair Letitia James. These policies helped address long-standing recycling inequities and establish a more just framework for the Right to Recycle Collection Initiative.

Despite our contributions to environmental justice legislation and demonstrating success in advancing sustainability initiatives on NYCHA campuses, our frontline expertise has been largely excluded. This misalignment contradicts the CLCPA and LL49 mandates to prioritize disadvantaged communities and has failed to invest in resident-led solutions, workforce development, and scalable models grounded in our lived experience. If DSNY's waste management draft is serious about achieving the City's sustainability goals, these agencies must be accountable, invest in, and partner with frontline organizations who can translate policy into measurable outcomes.

ICGT WASTE DIVERSION INITIATIVES

Recycle to Right Collection Initiative offers **free** weekly at-your-door recycling collection year-round. To enroll residents, we provide speedy yet comprehensive educational workshops, distribute reusable Sort 'n' Store bags to sort materials, and literature to reinforce the practical skills in the comfort of their own homes. The closed-loop, zero-waste education system diverts a variety of materials from the waste stream, including metals, plastic, glass, paper, e-waste, textiles/household items, and organics. Our "service delivery" approach provides residents with **the most convenient, accessible, and engaging** at-your-door recycling collection experience. To date, over **212+ tons** have been diverted from landfills, but it could be so much more.

"Mini MRF" - manually sorting recyclables plays a critical role in decreasing contamination in high-density residential settings such as NYCHA campuses. Our on-site localized sorting process allows for 100% contaminate-free materials before entering the broader waste stream. This process prevents materials from being sent to landfill or incineration. Additionally, manual sorting creates opportunities for resident employment and hands-on education, reinforcing proper recycling behaviors while building accountability and local stewardship within the community.

Re-Uza-Palooza-Thon™ collects, recycles, upcycles, and **donates gently used clothing, household items, books, toys, and shoes.** To **address the high rate of textile disposal,** we transitioned from two clothing swap/donation events per year to a weekly at-your-door service model. This service was sorely needed to amplify our closed-loop practices and reduce the amount of textiles being thrown in the trash. Since launching, the program has diverted over 30 tons of materials.

Other Peoples Plastic™ - processing and marketing post-consumer plastic to artists who transformed the recovered plastics into lighting, furniture, outdoor equipment, sculptures, and art installations.

Scrape-Ur-Plate™ allows residents to take ownership of their food waste by providing an **at-your-door food scrap pick-up service** and/or a free in-home food “pre-composter”. The program’s goal is to distribute devices at several NYCHA campuses in every borough. The pilot program will promote our mission to strengthen community involvement and awareness about food waste reduction and composting.

Workforce Development trains and hires residents to engage their fellow residents. When fully expanded, our program can create hundreds of livable-wage jobs. Our community-rooted approach has created 24 green jobs, with five residents currently employed, which reflects our commitment to community-based leadership. This approach has created buy-in by being accessible to residents, maintaining consistent engagement at their doors, and fostering good relations with tenant leaders. Living and working within the communities establishes ICGT as a trusted advocate for change.

Scrape-Ur-Plate™/sRATegy™ Mitigation™ (“U Bred ‘Em, When U Feed ‘Em”) is a program and tagline that’s coupled with the organics collection program. The sRATegy™ is to mitigate the rodent population by placing the onus on every citizen who disposes of food waste improperly. The education workshop combines the strategic solution for rat reduction, coupled with the necessity to redirect food waste from being on the curb.

Resident Environmental Action Leaders (R.E.A.L.) - Programming consists of residents leading grassroots efforts as environmental ambassadors to increase recycling participation, reduce waste, and strengthen environmental stewardship within their communities.

Rescuing Leftover Cuisine - as volunteers, we rescue fresh and healthy leftover food from commercial businesses and distribute it to communities struggling with food insecurity.

Plastic Bottle Waste Reduction - to reward participation and reduce plastic water bottle usage, we provide donated ZeroWater filtration systems.

E-Waste Collection - due to the lack of storage space on campus, we currently transport the e-waste to the LES Ecology Center events

WE ARE THE BLUEPRINT

What sets us apart is that our model is more than just waste diversion—it's a system change. We've created the ability to tackle **one of the most persistent challenges in increasing recycling rates in New York City and NYC public housing.**

With nearly half a million residents, this community is one of the most challenging environments to implement effective recycling. While local agencies and officials have attempted narrow interventions and failed, ICGT has developed a solution that transforms barriers into opportunities- turning residents into environmental leaders. We are uniquely positioned because we have built an ecosystem for families who see themselves as the driving force of environmental justice in their communities.

Nowhere does a door-to-door recycling model like ICGT exist, combining service and intensive community engagement at this scale. Since our inception, ICGT has positioned itself at the forefront of innovation in recycling and community engagement. Our work is not just rooted in local impact and on-the-ground experience; it's backed by global research studying organizations worldwide that target specific materials or communities.

STATE AND LOCAL LEGISLATION

The outcry for waste equity in underserved communities took place long before city agencies came to the realization that environmental noisemakers would only get louder.

Local Law 49-2017 (16-316.4)

In 2017, then Sanitation Committee Chair Letitia James created the recycling law, which reads as such: "This law requires the Department of Sanitation to consult with NYCHA and DSNY consider implementing a pilot incentives program to increase recycling rates in public housing. If the department concludes that such a program is feasible and would increase recycling rates, it must implement such a program by 2020 and report on its effectiveness to whether it should be made permanent after two years."

We are still waiting...

NYS Climate Action Council Waste Advisory Panel (CLCPA)

ICGT was selected to join the council to offer recommendations to support the implementation of the NYS Climate Act. After several months of discussions, every recommendation ICGT submitted received approval. This led to millions of dollars being allocated to organizations that serve disadvantaged communities.

Despite our contributions to environmental justice legislation and demonstrating success in advancing sustainability initiatives on NYCHA campuses, our frontline expertise has been largely excluded. This failure to invest in scalable recycling models utilizing resident-led solutions grounded in lived experience mainly contradicts the **local legislative mandates** to prioritize disadvantaged communities.

THE ASK

1) We respectfully urge all City agencies involved to:

- Provide details as to what other effective recycling strategies NYCHA and DSNY have implemented on NYCHA campuses.
- Execute **formal MOUs** between DSNY, NYCHA, and community-based implementers to clarify roles in recycling education, compliance support, and enforcement readiness.
- Create a dedicated line item in NYCHA's waste management budget to fund and implement ICGT's scope of work.

Fully invest in ICGT environmental programs that support:

- Expanding our core initiative to ensure all NYCHA residents have convenient access to NYC recycling services on NYCHA campuses citywide
- A workforce training program leading to green job opportunities
- Dedicated operational space(s) for on-site recycling collection services and programming
- On-site programs supporting outreach/education and community engagement

The oxymoron presents itself when New Yorkers are asked to make a difference, but are met with incredible resistance and disenfranchisement.

Without intentional inclusion of proven community-based proposals, city agencies will continue the practice of implementing ineffective climate policies that reinforce systemic inequalities rather than dismantling them.

If City agencies are serious about achieving the City's sustainability goals, these agencies must be accountable, invest, and partner with frontline organizations who can translate policy into measurable outcomes.

“Insanity is doing the same thing over and over, but expecting a different result.”
~ Albert Einstein, Physicist and Civil Rights Advocate

Your attention and collaborative action is appreciated.

Brigitte Charlton-Vicenty
Founder/CEO/Exec. Director

Brigitte Charlton-Vicenty

Inner City Green Team Economic & Environmental Development, Inc.
innercitygreenteam.org

**On Behalf of the London Terrace Tenants Association:
Preliminary Budget Hearing Testimony 3/24/2026
NYC City Council – Committee on Public Housing**

To: The New York City Council,

We the undersigned board members of the London Terrace Tenants Association (the “LTTA”), write to you on behalf of the LTTA to implore you to properly fund NYCHA housing, protect Section 9, hold NYCHA accountable, and **keep public housing public**.

This hearing is not a routine budget exercise. It is a moral reckoning.

The New York City Council and this Committee are charged not only with funding public housing, but with **protecting it**—protecting the people who live there, protecting the public asset itself, and protecting the principle that housing is a public good, not a speculative commodity.

And yet, what we are witnessing is a steady, deliberate retreat from that obligation.

The New York City Housing Authority has been allowed to fall into disrepair through years—decades—of neglect, mismanagement, and, yes, malfeasant oversight. The result is not accidental. It is the predictable outcome of starving a public system and then declaring it broken.

Now, instead of repairing what was intentionally neglected, we are being told that the “solution” is to hand it over to private interests.

Let’s be clear about what RAD/PACT represents: These so-called “public-private partnerships” are not rescue plans—they are **exit strategies**. They are a mechanism to disencumber the City of its responsibility and transfer control, revenue streams, and long-term value into the hands of private developers and financial actors.

Calling this preservation is a distortion.

Calling this a partnership is an insult.

This is, quite plainly, **giving the foxes the keys to the henhouse.**

Under RAD/PACT:

- Public land is effectively removed from full public control.
- Tenants are shifted out of traditional Section 9 protections.
- Long-term public accountability is diluted, if not erased.
- Billions in public subsidy are redirected into private balance sheets.

And for what? Because we are told there is “no money.”

That claim is false. There is money—there is always money. The question is where it is directed and who benefits.

We are prepared to finance stadiums, megadevelopments, and corporate subsidies through complex public financing structures. We issue bonds. We create tax abatements. We engineer revenue streams when there is political will. But when it comes to the homes of hundreds of thousands of New Yorkers—suddenly, we are told to accept privatization as inevitability.

It is not inevitability. It is a choice:

- A choice to abandon Section 9.
- A choice to abandon direct public responsibility.
- A choice to prioritize financial convenience over human stability.

This Committee must reject that false premise. If the City and State can finance infrastructure, they can finance public housing rehabilitation **without surrendering it.**

If the political will existed, we could:

- Issue public bonds dedicated to NYCHA capital repairs;
- Establish dedicated revenue streams, including progressive taxation mechanisms;

- Fully fund maintenance and the Vacancy Readiness Unit to bring apartments back online;
- Restore buildings **without demolition and without displacement.**

Instead, what tenants are experiencing right now is:

- Chronic repair delays,
- Unsafe living conditions,
- Units sitting vacant while people are in desperate need of housing,
- A system that feels less like neglect and more like managed decline,
- And from that decline, we are told to accept privatization as salvation.

Public housing is not a failed experiment. It is a **deliberately underfunded success**—one that has housed generations of working-class New Yorkers, disproportionately people of color, despite the City’s failure to uphold its end of the bargain.

What is being proposed now is not reform. It is abdication. And it comes with a profound moral cost:

- The erosion of public trust,
- The displacement of vulnerable residents,
- The quiet transfer of public wealth into private hands.

This Committee must ask itself: are you stewards of public housing—or are you facilitators of its dismantling?

Because history will not remember the technicalities of financing structures. It will remember whether you chose to protect public housing—or to preside over its unraveling.

The mandate is clear:

Preserve it.

Protect it.

Fund it.

Fix it—without giving it away.

Anything less is a failure of duty. And the residents of NYCHA, your fellow New Yorkers, deserve far more than that.

Respectfully submitted,

Inge Ivchenko, President

Michelle Spinner, Vice President

Andy Humm, Treasurer

Margaret Becker, Board Member

Eileen Moss, Board Member

Chaplain Dana Elden – St. Mary’s Park Houses Testimony on Section 9 Public Housing Funding – City Council Public Housing Hearing March 24, 2026.

Introduction

Good morning. My name is Dana Elden, President of St. Mary’s Park Houses in the South Bronx. I am grateful for the opportunity to offer this formal testimony regarding my recent experiences in public housing. Throughout every stage of my involvement, I have spoken with conviction about the urgent need for increased funding for Section 9 public housing. Despite the diligent efforts of resident leaders and independent non-profits to make our voices heard, it often feels as though we are speaking to a brick wall. I strongly recommend that adequate funding for Section 9 is essential for securing the homes of thousands of families and seniors, who represent a sizable portion of residents in NYCHA developments.

Current Funding Issues

The repeated emphasis on NYCHA's accomplishments is, frankly, insulting. Section 9 public housing is suffering from a lack of funding. The Mayor’s administration has allocated \$662 million towards Section 8, yet nothing for Section 9 public housing. This situation is unacceptable, and funding should be prioritized for Section 9. Therefore, I am formally requesting a moratorium on privatizations related to Project-Based Section 8, including RAD/PACT and the Trust. I also call for a forensic audit of NYCHA to ensure that income generated from infills and PACT conversions is invested directly into Section 9 units. Section 9 should receive funding first and the humanity of putting the residents first is a must.

Resident Experiences and Concerns

I have served as a founding executive board member of Residents to Preserve Public Housing, working with resident leaders citywide for nearly seven years. Some developments have already experienced the RAD/PACT process, while others are currently undergoing it. A consistent concern among many is the loss of services, including maintenance, repairs, and customer control. These conversions often result in poor construction and inferior materials, leading to frequent repair needs and crude attempts by residents to address these issues themselves.

Vacancy and Participation Impact

Recently, an issue regarding space agreements was sent to resident leaders citywide. As a committee member involved in reviewing forms, agreements, and reports, I recognize the importance of ensuring NYCHA’s adherence to CFR24 964 HUD Rules and Regulations. Resident leadership, tenant participation, funding, and support have declined, due to the increasing number of vacant units in various developments. Resident involvement is essential. As of February 2026, my

development has 104 vacancies, directly affecting the funding our council receives for tenant participation events and services. This has impacted us by nearly \$5,000.00.

Stock Transfer Tax Rebate Repeal

Residents to Preserve Public Housing recently began discussions about repealing the Stock Transfer Tax Rebate. This repeal would benefit many agencies citywide, but for NYCHA's Section 9 residents, it would generate \$3.75 billion annually to fund the Section 9 portfolio. We are actively seeking support to make this proposal a reality.

Conclusion

As a senior and disabled resident leader and an active community member, and a NYS Chaplain, I am compelled to consider the humanity of public housing and its ongoing failure to provide adequate funding. I urge a halt to conversions until the best outcomes for residents are thoroughly explored and ensured.

Thank you for this opportunity.

Peace & Blessings.

Chaplain Dana G Elden, President, St. Mary's Park Houses Resident Council

Chaplain Dana Elden -347-567-5459

Address: 645 Westchester Avenue #7H, Bronx, NY 10455

- **President, St. Mary's Park Houses Resident Council** Email: dgelden149@gmail.com /**Director**, St Mary's Park Houses Council, Inc. (5013C): Email: saintmarysphcinc@gmail.com
- **South Bronx District Exec Bd Member:** Email: sbxdistrict007@gmail.com
- **RPPH (Residents to Preserve Public Housing, inc) Founding/Exec. Bd. Member**, Personal Email: Redsnapper149@gmail.com
- **NYS Christian Community Chaplain Dana G Elden**, email: nyscommunitychaplaineden@gmail.com

Policy Brief

Fully Fund & Preserve Section 9 Public Housing

A Roadmap for Investment, Accountability, and Public Control

Submitted to: NYC Council Committee on Public Housing

Chair: Chris Banks

Members: Elsie Encarnación, Christopher Marte, Darlene Mealy, Chi A. Ossé, Lincoln Restler, Julie Won

Prepared by Tamika Mapp, District Leader 68th AD, Part D

March 24, 2026

THE ISSUE

New York City public housing residents are living in conditions that no New Yorker should have to endure—conditions that are the direct result of long-term underfunding and policy decisions that prioritize privatization over preservation.

Across Section 9 developments, residents continue to face:

Mold and environmental hazards

Broken elevators and unreliable infrastructure

Unsafe walkways and deteriorating buildings

Delayed, incomplete, or low-quality repairs

At the same time, billions in potential public revenue are being diverted elsewhere.

Public housing is not failing—our funding priorities have failed public housing.

Our community calls for a clear shift in policy and funding priorities:

Preserve Section 9 as permanently public housing

Invest in stable, recurring funding streams

Deliver comprehensive, development-wide rehabilitation

Ensure resident-led oversight and accountability

Halt privatization that undermines long-term affordability and control

KEY POLICY SOLUTIONS

1. IMMEDIATE INVESTMENT IN SECTION 9

Shift \$663 million directly into Section 9 public housing

Prioritize mold remediation, elevator repairs, and critical infrastructure

Require full transparency and public reporting on expenditures

2. UNLOCK EXISTING REVENUE

Support repeal of the Stock Transfer Tax Rebate

End the return of billions to Wall Street

Redirect funds into public housing preservation and capital repairs

3. CREATE NEW REVENUE STREAMS

To ensure long-term stability, New York State must adopt progressive housing-based revenue solutions:

Pied-à-Terre Tax: Target high-value secondary residences not used as primary homes

Luxury Housing Tax: Apply progressive taxation on high-end real estate transactions

Impact:

Reduces speculative investment

Creates sustainable funding for public housing

Advances housing equity across New York

4. DEDICATE FAIR SHARE ACT FUNDING

Earmark 10% of Fair Share Act revenue to Section 9

Establish a consistent and protected funding stream

Recognize public housing as essential infrastructure

5. FEDERAL FUNDING ALIGNMENT

Urge federal lawmakers to dedicate 10% of revenue from the “Make Billionaires Pay Their Fair Share Act” to public housing

Align national tax policy with housing stability

Reinforce federal responsibility for Section 9

COMPREHENSIVE REHABILITATION PLAN

Residents do not need temporary fixes—they need full restoration of their homes.

Priority Investments:

Mold removal that addresses root causes

Roof replacements

Elevator modernization

Heating, plumbing, and electrical system upgrades

Safe sidewalks and common areas

Energy efficiency improvements

Implementation Requirements:

Multi-year capital plans for each development

Public-facing dashboards tracking progress

Resident-informed prioritization of repairs

Outcome: Healthier homes, lower long-term costs, and restored dignity for residents.

STOP PRIVATIZATION

Call for a Moratorium on Project-Based Section 8 (RAD/PACT)

Halt all new conversions from Section 9

Conduct a full audit of existing conversions

Key Concerns:

Reduced public accountability

Inconsistent repair outcomes

Lack of meaningful resident consent

Public housing must remain public—no displacement through policy.

DEVELOPER ACCOUNTABILITY & REFORM

Current Challenges

Residents report:

Delays in construction timelines

Poor workmanship

Lack of enforcement for non-compliance

Proposed Solutions

Performance-Based Contracts

Tie payments to completion benchmarks and quality standards

Clawback Provisions

Recover funds from developers who fail to meet obligations

Public Contractor Registry

Track performance and prevent repeat failures

Public Development Partnership Model

Maintain full public ownership of housing assets

Use developers strictly as contracted service providers

Require:

Fixed-term contracts

Transparent budgets

Community hiring standards

Resident approval before project sign-off

Result: Accountability without privatization.

RESIDENT POWER & GOVERNANCE

Establish resident oversight bodies at the development level

Require resident input in all major funding and capital decisions

Ensure transparency in project timelines and spending

Principle:

Nothing about us without us.

WHY THIS MATTERS NOW

This is a defining moment for public housing in New York City.

We can either:

Continue down a path of disinvestment and privatization

or

Make the decision to fully fund, preserve, and strengthen public housing

This plan provides a real, actionable path forward.

CALL TO ACTION

We respectfully urge the Committee on Public Housing to:

Support shifting \$663 million into Section 9

Advocate for repeal of the Stock Transfer Tax Rebate

Advance new revenue streams (pied-à-terre and luxury housing taxes)

Dedicate 10% of Fair Share Act revenue to public housing

Push for federal funding alignment

Enact a moratorium on privatization

Strengthen developer accountability

Public housing is essential infrastructure—it houses the workers, families, and seniors who make New York City run.

We are not asking for luxury—we are demanding safe, dignified homes.

Fund public housing. Preserve Section 9. Put residents first.

Tamika Mapp

845.380.4050

Nycha budget Testimony- 3/24/26

Siide/Riis/ Stayed Sect 9

Privatization via PACT and the Trust causes harm to tenants and is no longer a reliable

or sustainable funding source for public housing repairs. Yet **Mayor Mamdani's budget**

allocates \$663 million towards privatization and \$0 towards Section 9. We do not

accept this. We / I call on the New York City Council to pursue these solutions:

1. Shift the Mayor's preliminary allocation of **\$663M towards Section 9 public**

housing, and away from Project Based Section 8/ PACT.

2. **Support the Repeal Of Stock Transfer Tax Rebate** which would provide an

estimated \$2B to \$3.75B annually to Section 9 units managed by NYCHA.

3. Earmark 10% of revenue from New York City Council's **Fair Share Act** securing

\$400M annually for NYCHA Section 9.

4. Urge federal lawmakers to earmark 10% of revenue from the **Make Billionaires**

Pay Their Fair Share Act securing \$22B annually for Section 9 public housing

nationally.

5. This funding must be **applied toward comprehensive rehabilitation and unit**

repairs at Section 9 developments, prioritizing developments with the largest

need.

6. Place a **moratorium on privatization** via Project Based Section 8 (both RAD/

PACT and the Trust).

a. Tenants converted under PACT and the Trust are at risk with \$0 in capital

funds allocated after fiscal year 2026.

7. Conduct a **forensic audit of NYCHA to confirm** that Section 9 funding, and the

income generated by infills and PACT conversions are being reinvested in

Section 9 units.

Metin Sarci

[REDACTED]
New York, NY 10031

March 24, 2026

The Honorable Chris Banks Chair, Committee on Public Housing
New York City Council
City Hall New York, NY 10007

RE: Committee on Public Housing: Preliminary Budget Hearing Testimony

Good afternoon, Chair Banks and Members of the Committee on Public Housing. My name is Metin Sarci. I serve as the Co-Chair of the Housing, Land Use, and Zoning Committee for Manhattan Community Board 9. I am also an employee of the New York City Housing Authority; however, I am testifying today in my personal capacity and the views expressed in this statement are my own and do not reflect any official position or policy.

In reviewing this Preliminary Budget, it appears that public housing residents are subjects in a perverse human experiment to determine how much "weaponized incompetence" is required to validate the destruction of their homes. We are witnessing a manufactured choice: place public assets under private enterprise, move them to a Trust that works with a distrusted organization, or suffer the consequences.

A vote for Section 9 should not be a vote for the status quo. It is a vote that says, "I believe in Public Housing." The failure of the current Section 9 model is not a failure of the funding stream, but a failure of stewardship.

I am submitting a program proposal for a federally-sanctioned solution: Resident Management Corporations (RMC). Unlike PACT or the Trust, the RMC model professionalizes resident-led oversight within the Section 9 framework. By establishing the institutional capacity required under federal regulation, RMCs can mirror Community Boards while using public-nonprofit solutions to address maintenance, security, and essential services.

By utilizing HUD "Resident Savings" provisions, RMCs unlike NYCHA can retain operational surpluses for site-specific repairs, offering a vital cost-avoidance strategy against the IBO-projected budget gaps for FY27–30.

We must empower residents who choose to stay in Section 9 with the professional tools to manage their own environments. I urge this Committee to support the RMC program as the legitimate, third-path solution for NYCHA's future.

To: NYC Council, Committee on Public Housing
From: Metin N Sarci
Subject: Resident Management Corporation Program Proposal
Date: 3/24/26

Executive Summary

NYCHA faces a structural crisis defined by a \$78.3 billion capital backlog that traditional centralized management cannot resolve. This proposal advocates for a strategic transition toward decentralized stewardship by establishing Resident Management Corporations (RMCs). By professionalizing resident associations through a structured institutional capacity program overseen by a dedicated Director of the Office of Resident Management Corporations within the Resident Services, Partnerships, and Initiatives (RSPI) department, the city can mirror the localized expertise of its 59 Community Boards. The program moves beyond volunteer-led models to provide the administrative staffing, legal expertise, and regulatory compliance necessary to meet HUD standards under 24 CFR Part 964. As illustrated in the Program Tier Comparison below, this investment includes centralized executive oversight to ensure consistency across multiple developments.

As the Independent Budget Office (IBO) identifies significant structural budget gaps for the FY27–30 period, the RMC model serves as a vital cost-avoidance strategy. By decentralizing management, in line with the 2019 Federal HUD Agreement; NYCHA can mitigate the fiscal impact of the \$78.3 billion capital backlog through more efficient, site-specific asset stewardship.

Table 1: Program Tier Comparison

Metric	(Pilot)	(Recommended)	(Transformation)
Total Funding	\$760,000	\$1,700,000	\$4,700,000
Number of Sites	3 Developments	5 Developments	10 Developments
Cost Per Site	\$251,666	\$327,000	\$466,000
Primary Goal	Operational Proof	Technical Proficiency	Institutional Autonomy

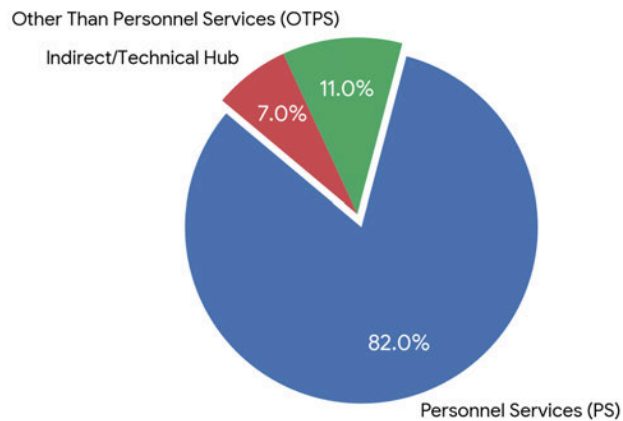
The ultimate goal is to shift operation functions into the hands of residents who possess the highest stake in the success of their neighborhoods. Success depends on providing associations with a "District Office" equivalent capable of managing multi-million dollar property assets. By leveraging federal resident participation funds and implementing professional oversight, the city can create a model of accountability that stabilizes the public housing stock and reinvests operational savings into development-level improvements.

Budget Narrative & Justification

The current volunteer-based tenant association model lacks the professional capacity to navigate HUD's complex regulatory environment. Associations are often under-resourced and unable to maintain the "institutional memory" or rigorous records required for federal RMC recognition. The proposed budget justifies costs based on three primary pillars: (1) providing localized administrative support, (2) building technical organizational capacity, and (3) providing bridge funding for specialized legal and outreach services.

At an estimated cost of \$327,000 per site (Recommended Tier), the RMC program provides a localized administrative structure comparable to a Community Board District Office. This investment protects multi-million dollar housing assets more effectively than existing centralized models, which currently struggle to address localized maintenance needs under the \$78.3 billion backlog. Costs are prioritized to address the mandatory role of the Qualified Housing Management Specialist and the legal requirements for non-profit incorporation. Utilizing professionalized roles ensures that federal "Resident Savings" provisions can be realized through more efficient, localized property stewardship.

Chart 1: Administrative Spending Ratio Distribution



Resident Savings provisions in HUD regulations permit RMCs to retain operational surpluses. These funds will be contractually restricted for reinvestment into site-specific capital repairs, modernization projects, or community-led social services, providing a direct incentive for operational efficiency.

Personnel & Fringe Benefits

The personnel model benchmarks a Director of the Office of Resident Management Corporations to NYCHA M-level Management Pay Plan titles, while Association Managers are benchmarked to NYC Community Board District Managers found on Checkbook NYC.

Table 2: Standard Staffing Model

Position	Salary Range	Responsibility
Director (Office of RMCs)	\$120k - \$150k	RSPI Lead / Centralized Oversight
Association Manager	\$85k - \$119k	Executive Strategy & Staff Coordination
Outreach Specialist	\$55k - \$84k	Resident Engagement & Voting
Admin Coordinator	\$55k - \$84k	Compliance & Record Keeping
Resident Liaison	\$50k - \$60k	Intake & Constituent Services

Budget calculations include a 35% fringe benefit rate to cover health insurance and pension contributions, benchmarked against Mayor's Office of Management and Budget (OMB) standards.

The RMC model is intended to complement, not displace, the existing civil service workforce. NYCHA will adhere to all notification requirements for relevant labor unions if specific job titles are impacted, ensuring the RMC scope of work aligns with collective bargaining agreements and procurement standards.

Direct & Indirect Costs

Other Than Personal Services (OTPS) costs include the hardware and software licenses necessary for secure record-keeping according to Office of Technology and Innovation Budget (OTI) standards. Crucially, these funds cover mandatory CPA audits and fidelity bonding. Federal regulations require that RMCs managing large developments undergo annual Single Audits, which can cost up to \$25,000 in the New York market.

Chart 2: Compliance and Fixed Cost Breakdown

Estimates from FirmKey Solutions on non profit auditing costs

Fixed Cost Item	Amount
Annual CPA Single Audit	\$22,500
Software Programming	\$18,000
Fidelity & Liability Insurance	\$12,000
Board Training/Education	\$7,500

Indirect costs cover the centralized Technical Assistance Hub. This hub, managed by the Director, provides specialized legal counsel and financial auditors who handle HUD procurement rules and labor relations across multiple sites. Legal fees are specifically allocated for non-profit 501(c)(3) incorporation and the complex negotiation of management contracts with NYCHA. This professionalized support structure removes the "hidden" costs of institutional capacity that often cause resident groups to stall during the transition from association to corporation.

Timeline & Performance Metrics

The RMC transition follows a three-phase timeline over approximately 24 months. Phase 1 focuses on the Institutional Foundation, anchored by the hiring of the RSPI Director and site-level managers, building capacity, and procedures to gain 501c3 approval. Phase 2 covers Capacity Growth, where the Director oversees the "shadowing" of NYCHA property operations and ensures that the upcoming PNA (Physical Needs Assessment) data is accurately utilized for RMC planning.

Table 3: Implementation Roadmap

Phase	Month	Milestone	KPI
I: Foundation	1-6	Hire Director Hire Managers	501(c)(3) Approval
II: Capacity	7-18	Shadowing / PNA	Internal Audit Cleanliness
III: Transition	19-24	Majority Vote	HUD Recognition Certificate

Phase 3 involves the finalization period. The primary performance metric is the execution of a HUD-mandated majority vote to begin working on a contract proposal.

Proof of Concept: Guste Homes RMC

The Guste Homes RMC in New Orleans, LA demonstrates the power of institutional autonomy; notably, the corporation began with property operations, gained contracting directly from HUD and later successfully managed over \$25 Million in FEMA reconstruction funding independent of the local housing authority following Hurricane Katrina, proving the model's resilience and success.

References

1. **24 C.F.R. § 964.120.** *Resident management corporation requirements.* Electronic Code of Federal Regulations (eCFR).
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Resident Management Corporations

A Program Project Overview

2 Year Program Objectives



CREATE ADMINISTRATIVE
SUPPORT



BUILD TECHNICAL CAPACITY



BRIDGE FUNDING FOR
SPECIALIZED SERVICES
(LEGAL, OUTREACH)

Program Menu

Metric	(Pilot)	(Recommended)	(Transformation)
Total Funding	\$760,000	\$1,700,000	\$4,700,000
Number of Developments	3	5	10
Cost Per Site	\$251,666	\$327,000	\$466,000
Primary Goal	Operational Proof	Technical Proficiency	Institutional Autonomy

At an estimated cost of \$327,000 per site the RMC program provides a localized administrative structure comparable to a Community Board District Office.

Phase I: Building Foundation

See Checkbook NYC

Staff is hired and responsibility procedures are developed:

- ▶ Centralized Oversight
- ▶ Executive Strategy & Coordination
- ▶ Resident Outreach & Engagement
- ▶ Compliance & Record Keeping
- ▶ Intake & Constituent Services

Legal Services are procured to gain 501c3 Incorporation:

- ▶ State and Federal Requirements
- ▶ Post- Incorporation Compliance

Phase II: Building Technical Capacity

- ▶ Financial Accounting & Grant Administration
- ▶ Funding Agreement (\$25 Per Occupied Unit vs \$14.85)
- ▶ Housing Specialist
- ▶ Operations Expertise Shadowing (Next PNA: 2028)

Phase III: Transitioning to a recognized RMC

- ▶ Association must pass a Resolution requiring a public vote
- ▶ Public Vote
Requires a majority (50% + 1) of ALL residents (18+, on the lease) to approve the formation.

Next Goal: Obtaining a Contract

With Administration Support, RMCs can begin developing contract proposals and obtain required licensing, insurance, and trainings for the following:

- ▶ Resident (re)certifications and orientation
- ▶ Lease Enforcement
- ▶ Financial Management
- ▶ Safety & Security
- ▶ Property Maintenance
- ▶ Supportive Services

**NYC City Council – Committee on Public Housing
Preliminary Budget Hearing Testimony 3/24/26**

This hearing is not a routine budget exercise. It is a moral reckoning.

The New York City Council and this Committee are charged not only with funding public housing, but with **protecting it**—protecting the people who live there, protecting the public asset itself, and protecting the principle that housing is a public good, not a speculative commodity.

And yet, what we are witnessing is a steady, deliberate retreat from that obligation.

The New York City Housing Authority has been allowed to fall into disrepair through years—decades—of neglect, mismanagement, and, yes, malfeasant oversight. The result is not accidental. It is the predictable outcome of starving a public system and then declaring it broken.

Now, instead of repairing what was intentionally neglected, we are being told that the “solution” is to hand it over.

Let’s be clear about what RAD/PACT represents.

These so-called “public-private partnerships” are not rescue plans—they are **exit strategies**. They are a mechanism to disencumber the City of its responsibility and transfer control, revenue streams, and long-term value into the hands of private developers and financial actors.

Calling this preservation is a distortion.

Calling this partnership is an insult.

This is, quite plainly, **giving the foxes the keys to the henhouse**.

Under RAD/PACT:

- Public land is effectively removed from full public control.
- Tenants are shifted out of traditional Section 9 protections.
- Long-term public accountability is diluted, if not erased.
- Billions in public subsidy are redirected into private balance sheets.

And for what? Because we are told there is “no money.”

That claim is false. There is money—there is always money. The question is where it is directed and who benefits.

We are prepared to finance stadiums, megadevelopments, and corporate subsidies through complex public financing structures. We issue bonds. We create tax abatements. We engineer revenue streams when there is political will. But when it comes to the homes of hundreds of thousands of New Yorkers—suddenly, we are told to accept privatization as inevitability.

It is not inevitability. It is a choice.

A choice to abandon Section 9.

A choice to abandon direct public responsibility.

A choice to prioritize financial convenience over human stability.

This Committee must reject that false premise. If the City and State can finance infrastructure, they can finance public housing rehabilitation **without surrendering it.**

If the political will existed, we could:

- Issue public bonds dedicated to NYCHA capital repairs
- Establish dedicated revenue streams, including progressive taxation mechanisms
- Fully fund maintenance and the Vacancy Readiness Unit to bring apartments back online
- Restore buildings **without demolition and without displacement**

Instead, what tenants are experiencing right now is:

- Chronic repair delays
- Unsafe living conditions
- Units sitting vacant while people are in desperate need of housing
- A system that feels less like neglect and more like managed decline

And from that decline, we are told to accept privatization as salvation.

Public housing is not a failed experiment. It is a **deliberately underfunded success**—one that has housed generations of working-class New Yorkers, disproportionately people of color, despite the City's failure to uphold its end of the bargain.

What is being proposed now is not reform. It is abdication. And it comes with a profound moral cost:

The erosion of public trust.

The displacement of vulnerable residents.

The quiet transfer of public wealth into private hands.

This Committee must ask itself: are you stewards of public housing—or are you facilitators of its dismantling?

Because history will not remember the technicalities of financing structures. It will remember whether you chose to protect public housing—or to preside over its unraveling.

The mandate is clear:

Preserve it.

Protect it.

Fund it.

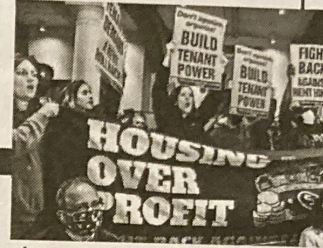
Fix it—without giving it away.

Anything less is a failure of duty. And the residents of NYCHA, your fellow New Yorkers, deserve far more than that.

Sandy Rayburn

Fort Greene

MESSAGE TO THE MAYOR: NEW YORK CITY TENANTS DESERVE A REAL SAY!



In January 2026, Mayor Zohran Mamdani signed an executive order to establish the Rental Ripoff Hearings, which excited New York City tenants as a way to collectively speak about housing issues to the city government. The form that these hearings are taking, though, is wasting their initial promise while excluding NYCHA tenants.

The website says the hearings will “offer New Yorkers a microphone to share poor conditions and unconscionable business practices,” but in reality tenants are actually granted 3 minutes to speak one-on-one to a city official and a chance to put stickers on a “visioning board” to mark their preferences around the city’s housing policy proposals. The site also says these events are specifically for private-market tenants, though the city’s incoming housing plan will also impact the nearly 300,000 tenants that live in public housing. This set-up isolates tenants from one another and denies them a real public forum to collectively express their shared challenges and proposed solutions.

For years, we have seen housing hearings that just create ways to blow off steam and redirect people into the individual complaint bureaucracy. Mayor Mamdani was elected on a vision to break from the past and wage a real struggle against abusive landlords that unleashed the collective power of working-class tenants. Tenants need to actually hold the power to shape the future of housing in New York City — in deeds, not just in words

Saundrea I. Coleman Written Statement for City Council Hearing 3/24/26

I am Saundrea I. Coleman a current resident of Isaacs Houses and a former Municipality employee, I supervised payroll for the NYPD. I am also the co-founder of the Holmes-Isaacs Coalition as well as a co-founder of 1NYCHA Advocates.

The conditions in NYCHA are just horrific. There are massive environmental issues that are making residents sick and are not be remediated. Mold, Mildew, Infestation, lack of repairs and crumbling infrastructure must be addressed, Now! The City's public housing authority has an obligation to preserve our homes and not to pass on their responsibilities to privatization schemes. The City, State and Federal Government must invest immediately into our homes. Stakeholders of public housing has seen the decline over the years and it has exacerbated especially when the white flight took place decades ago. There is a great number of Blacks and Hispanics that call NYCHA home, the disinvestment is systemic, the Lack of Care is Systemic, the patchwork repairs are systemic, the lack of heat and hot water is systemic, the inoperable elevators especially the newer ones is systemic, the infestation that residents are subjected to live with is systemic, our babies being poisoned with Lead is Systemic.

We at Isaacs Houses just concluded a vote between remaining Section 9, Pact or the Trust. This process was a challenging process. I personally experienced hostility from some members of the resident association board. We also had several trades unions out in the masses five days a week for several hours engaging with residents, and some of them was actually lying to residents telling them that under the Trust they remain section 9.

Comprehensive Modernization is the path to fix our homes and the funding that is received must be flushed into NYCHA immediately. The methodology of spreading out billions of dollars over ten years is ludicrous.

Respectfully submitted,

Saundrea I. Coleman



New York, N.Y. 10128

To: Committee on Public Housing Chris Banks, Chair, Members: Elsie Encarnación, Christopher Marte, Darlene Mealy, Chi A. Ossé, Lincoln Restler and Julie Won.

Date: March 24, 2026

Hearing: New York City Council Budget and Oversight Hearings on The Preliminary Budget for Fiscal Year 2027, The Preliminary Capital Plan for Fiscal Years 2027-2030 and The Fiscal 2026 Preliminary Mayor’s Management Report

We submit this testimony on behalf of our members, and neighbors.

Once again New York City’s public housing tenants face budgetary disappointment. This one is harder to process as Mayor Mamdani campaigned on creating affordability and equality. His support of the demolition of Fulton, Elliot and Chelsea Houses and a preliminary budget that funds privatization is a betrayal. We urge the city council, under the guidance of this committee, to stop him from inflicting further harm on us.

Rehabilitating and expanding Section 9 would address housing unaffordability and provide stability for the many households desperately needing affordable housing. “Affordable housing” based on AMI is not going to empty our shelters, or reduce the number of households held hostage by slumlords. It costs NYCHA \$45K to rehabilitate an empty unit, no corporate landlord can match that cost. Section 9 is the solution!

NYCHA’s Preservation Programs capital funding is intended to support PACT and the

The following graphs show the top ten (10) developments with the highest needs.

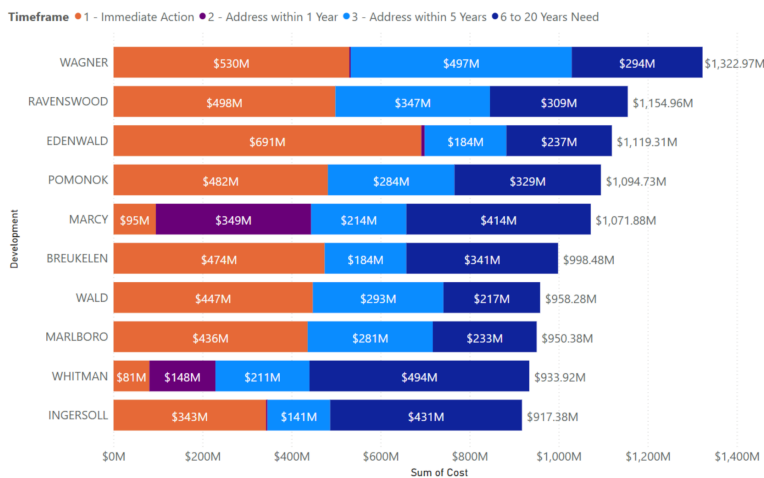


Figure 16 Developments with the Highest Needs by Timeframe

Public Housing Preservation Trust. But both programs are being rejected by tenants. Furthermore, PACT and the Public Housing Preservation Trust are at risk with zero capital funds allocated after FY2026. We urge you to sunset these programs due to the harm they cause to tenants. While the Ten-Year Capital Plan for HPD and NYCHA cuts funding dramatically starting in FY2027, we’ve identified revenue streams

that would reverse this trend. These funds should be allocated based on the physical needs assessment results, and the prioritization of developments with the [largest need](#).

We call on the New York City Council to pursue the following revenue centered solutions:

1. Shift the mayor's preliminary allocation of **\$663M towards Section 9 public housing**, and away from Project Based Section 8/ PACT.
2. **Support the Repeal Of Stock Transfer Tax Rebate** which would provide an estimated \$2B to \$3.75B annually in Section 9 units managed by NYCHA.
3. Earmark 10% of revenue from New York City Council's **Fair Share Act** securing \$400M annually for NYCHA Section 9.
4. Urge federal lawmakers to earmark 10% of revenue from the **Make Billionaires Pay Their Fair Share Act** securing \$22B annually for Section 9 public housing nationally.
5. Institute a **moratorium on privatization** via Project Based Section 8 (RAD/ PACT and the Public Housing Preservation Trust). The moratorium should be reliant on an impact study being conducted by the Government Accountability Office as requested by Congresswoman Maxine Waters in 2023.

We call on the New York City Council to pursue the following organizational centered solutions:

1. Collaborate with Comptroller Levine to conduct a **forensic audit of NYCHA**. We need to confirm that Section 9 funding, and the income generated by infills and PACT conversions, are being reinvested in Section 9 units.
 - a. We know that NYCHA receives *the developer's fee, annual administration fee, and cash flow payments after debt service from each PACT deal. But we don't know how much NYCHA is recouping via these streams.*
 - b. Because NYCHA has made itself the fiscal conduit for Project Based Section 8 we also need to ensure that Section 9 funding is being managed separately from funding for PACT/ RAD and the Preservation Trust.
 - i. An exploration of NYCHA *awarded contracts* brings up a lengthy list of cash transfers made from NYCHA to contracts associated with conversion to the Preservation Trust. We need to better understand how these funds are distributed and where they come from.
2. **Take advantage of our Faircloth allowance.** As of 2024 NYC can create 24,147 additional Section 9 units. Make Section 9 an option for buildings in bankruptcy proceedings. Expand Section 9 while truly empowering and protecting tenants!
3. **Educate tenants and elected officials** on the consequences of privatization via Project-Based Section 8.

4. Host a joint hearing with its Albany counterparts on RAD/PACT. During this hearing NYCHA and HUD's office of Public and Indian Housing should be asked to:
 1. Provide insight on the success of the program nationally, success should be defined on improved quality of life for previous Section 9 tenants living in a specific property.
 2. An explanation of the timeline for RAD/PACT conversions highlighting when tenants have an opportunity to oppose these.
 3. Expand on how said opposition is weighed in the larger application for RAD/PACT or Section 18.
5. Request a **new organizational plan** from NYCHA in collaboration with the federal monitor. The last plan was fiercely denounced by tenants and adopted in spite of our objections. We recommend this plan be inspired by the operational plans of 1965-1970.
6. Shift participants in the Neighborhood Employment Services Program, which supports community upkeep by deploying work crews across NYCHA developments towards building maintenance instead of groundskeeping.

In 2020 we raised concerns surrounding NYCHA's 2021 Transformation Plan ([our statement is attached and available via this link](#)). Since adopting this organizational plan NYCHA has continued to expand their mission, and shift resources unchecked. This organizational plan restructured NYCHA to ensure the transition to the Trust (formerly the Blueprint) before that law was adopted. By prioritizing the privatization of public housing NYCHA created a chaotic and inefficient bureaucracy.

Tenants experience this chaos via:

- The continued deterioration of developments not accepting privatization, in spite of the "savings" NYCHA experiences via [21,000+ conversions](#).
- The bullying tenant leaders experience when their development is being considered, or forced into RAD/PACT. Contrary to NYCHA's testimony, tenant leaders report being pushed into RAD/PACT.
- The harassment tenants experience once a RAD/PACT deal is announced. The new management office moves into the development and proceeds to hound tenants for lease signings, before their RAD/ PACT deals are finalized, sometimes before an application has been submitted to HUD's Special Application Center.
- The lack of improvement in repairs, wait time for said repairs and the quality of these repairs once NYCHA completes the handover, documented in [this](#) Human Rights Watch Report.
- Having their homes "managed" by slumlords such as Wavecrest.

Tenants not interested in leaving Section 9 find that staff and resources previously focused on Section 9 operations, projects and contracting are now focused on selling RAD/ PACT and the Trust to tenants, leaders, financial entities, elected officials and corporate landlords. Others that served as resident coordinators now work to troubleshoot the failures experienced under RAD/PACT. Even more concerning is the continued inflation of financial need that NYCHA continues to present to its customers, the public and elected officials.

We call on the New York City Council to pursue the following programmatic centered solutions:

1. Facilitate the prioritization of NYCHA DYCD programs by ensuring that providers serving NYCHA receive at least half of the "Community Grants Reinvestment Fund". At this time none of the grantees are housed within NYCHA complexes. As communities adversely impacted by the War on Drugs we should benefit from funding meant to provide restorative justice.
2. Urge NYCHA to pilot bringing rent collection back to development management offices.
3. Ensure that hiring focuses on securing union personnel for **roles that improve tenants' quality of life**. Each development should have a plumber, a carpenter, and enough building porters to assign two porters to each building. We would make plasterers and painters the second wave of hiring. These roles should provide apprenticeships to tenants and lean on Section 3.
4. Ensure that NYCHA is not utilizing the Big Apple Connect to facilitate the surveillance of tenants.
5. Urge NYCHA to lower its management cost per dwelling unit per month from \$1,398.

In closing, we urge you to recognize that in spite of abandonment, we continue to thrive. Public housing supports strong communities, diminishes gentrification and displacement, and supports tenants at every stage of life. An investment in Section 9 public housing will ensure more families have stability, and the social infrastructure necessary to be bold enough to inspire fashion, create hip hop, head to Harvard, become urban farmers, start businesses and be part of the solution.

Save Section 9

**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: Daron Sealey

Address: _____

I represent: Center for Justice Innovation

Address: 520 E 11th Avenue, NY, 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: 3/24/26

(PLEASE PRINT)

Name: Jackie DeValle

Address: TAKE ROOT JUSTICE

I represent: stabilizing NYC

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 3/24/26

(PLEASE PRINT)

Name: Pilar de Jesus

Address: Take Root Justice

I represent: _____

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: _____

(PLEASE PRINT)

Name: Eva Trimble

Address: _____

I represent: NYCHA COO

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: _____

(PLEASE PRINT)

Name: Shaan Mavani

Address: _____

I represent: NYCHA Chief Asset and Capital Management

Address: Officer

**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: Jonathan Gonveia

Address: _____

I represent: NYCHA EVP and Chief Real Estate Officer

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. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Lisa Bava-Hiatt

Address: _____

I represent: NYCHA CEO

Address: _____

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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: Annika Lescott-Martinez

Address: _____

I represent: NYCHA CFO

Address: _____

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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: Annika Lescott-Martinez

Address: _____

I represent: NYCHA

Address: _____

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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: SUAND MAVANI

Address: _____

I represent: NYCHA

Address: _____

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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: Lisa Trumble

Address: _____

I represent: NYCHA

Address: _____

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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: LISA BOVA-HIATT

Address: _____

I represent: NYCHA

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 03/24/26

(PLEASE PRINT)

Name: Norma Fontanez

Address: _____ NYC 10011

I represent: _____

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: 3/24/26

(PLEASE PRINT)

Name: Metin Sarci

Address: _____

I represent: Self

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 3/24/26

(PLEASE PRINT)

Name: Anna Luft

Address: 100 Pearl St, 19th Fl, NY, NY

I represent: New York Legal Assistance Group

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 3/24/26

(PLEASE PRINT)

Name: Wei Tang Yin

Address: _____

I represent: _____

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: _____

(PLEASE PRINT)

Name: Malika Khalsa

Address: _____

I represent: Salvadori

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: _____

(PLEASE PRINT)

Name: Lorraine Roberts

Address: _____

I represent: N. Elliot Cheldor

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

*Interpreter
Spanish*

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 03/24/26

(PLEASE PRINT)

Name: Maria Ayala

Address: [Redacted]

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 3/24/26

(PLEASE PRINT)

Name: James Cozer

Address: [Redacted]

I represent: The Center for Justice Innovation

Address: 520 8th Ave

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Tiffany Khan

Address: [Redacted]

I represent: Self

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 3/24/26

(PLEASE PRINT)

Name: Savosiah Gardner

Address: _____

I represent: _____

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: _____

(PLEASE PRINT)

Name: Renee Keith

Address: _____

I represent: Elliot Chelsea

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: _____

(PLEASE PRINT)

Name: LAYLA LAW-BISILCO

Address: _____

I represent: DISTRICT LEADER CHELSEA

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 3/24/26

(PLEASE PRINT)

Name: Miriam Salles

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 03/24/26

(PLEASE PRINT)

Name: Ms Yves

Address: PENNWOODMAN

I represent: Self

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 3/24/26

(PLEASE PRINT)

Name: JACQUELINE LARA

Address: _____

I represent: _____

Address: _____



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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: Zulay Velazquez

Address: _____

I represent: _____

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: _____

(PLEASE PRINT)

Name: Reginald Bowman

Address: _____

I represent: _____

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: _____

(PLEASE PRINT)

Name: Aixa Torrez

Address: _____

I represent: CCOP

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. _____ Res. No. _____

in favor in opposition

Date: _____

Name: JAYE GRADY (PLEASE PRINT) (12100) Dynamite 29T

Address: _____

I represent: NYCHA Resident

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. _____ Res. No. _____

in favor in opposition

Date: _____

Name: Celines Miranda (PLEASE PRINT)

Address: _____ NYC 10001

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms