



**Testimony of Jill Berry, First Deputy Commissioner at the New York City Department of Social Services**

**Before the New York City Council, Committee on General Welfare  
Oversight Hearing: Timeliness of Public Benefits Processing at the Human Resources Administration**

**December 15, 2022**

Good Morning, I want to thank the City Council’s Committee on General Welfare and Deputy Speaker Ayala for organizing today’s hearing on access to public benefits. We look forward to updating the Committee on our work to connect New Yorkers in need to our public assistance programs.

My name is Jill Berry, and I am First Deputy Commissioner of the New York City Department of Social Services (DSS).

I am joined today by my colleagues Lisa Fitzpatrick, Administrator of the New York City Human Resources Administration (HRA), and Ramon Flores, Assistant Deputy Commissioner at HRA.

The New York City Department of Social Services/Human Resources Administration is the nation’s largest social services agency. Each year, we assist more than three million New Yorkers through the administration of over fourteen public assistance programs and services. Every day, in all five boroughs, HRA provides essential programs and services to low-income New Yorkers. In administering these programs, HRA is at the forefront of this Administration’s efforts to combat poverty and address homelessness.

We appreciate the opportunity to brief you and the public on the work that DSS-HRA performs day in and day out to help vulnerable New Yorkers access critical social services. We are living in unprecedented times as we recover from a global pandemic that placed immense stress on all New Yorkers, particularly those with the least resources. Moreover, as we have reported before, COVID-19 challenged our agency like never before, as we quickly pivoted to alleviate the burden of insecurity for so many New Yorkers.

While the nation continues to recover from the pandemic, we must keep in mind that not all communities are recovering evenly – and that is the case in New York City. With a national unemployment rate of 3.5% as of September 2022, New York City has been slower to recover from the COVID-19 pandemic, with a current local unemployment rate of 5.6%. This is while we consider that the nation had a pre-pandemic unemployment rate of 3.5%, as compared to New York City’s 3.7%. There are many factors leading to these disparities, and we are currently

facing the challenges that come with a city that continues to recover from the repercussions of an unprecedented pandemic.

### **Increased need for services – responding to the pandemic**

Given this extraordinary landscape, we have been seeing an equally extraordinary demand for public benefits from New Yorkers across the five boroughs. Looking at the Supplemental Nutrition Assistance Program (SNAP), the volume of applications received by HRA during the pandemic reflects the heightened need for food security. During the height of the pandemic in April 2020, the agency received 84,000 SNAP applications in that month alone, the highest number of SNAP applications in modern history, reflecting a more than 200 percent increase compared to the 27,000 applications received in April 2019. Moreover, from March 2020 through June 2020, the period in which DSS-HRA experienced the greatest surge in SNAP applications, the Agency received 121,000 more SNAP applications than in the same period in 2019, a 113% increase.

The trends for Cash Assistance were just as unprecedented: in March 2020, DSS-HRA received approximately 12,745 more Cash Assistance applications than in March 2019, a 53 percent increase. Overall, between February 2020 and November 2020, there was an approximate 53,000-person, or 16 percent, increase in the Cash Assistance recipient caseload, and a more than 30,000-case increase, or nearly 17 percent.

It has long been the vision of the agency to break down barriers to benefit access, and pursuant to that vision, we have worked to modernize our service delivery model with our internet-based platform and mobile app, Access HRA, where New Yorkers can apply online for the public benefits they need to support themselves and their families. Strategies such as this one not only allow us to expand our reach to more New Yorkers seeking our services, but they also allow us to focus attention to those seeking in-person services at our many centers located across the city. We believe the increase in benefit applications demonstrates that benefits access is working.

Our response to the pandemic was proportional to its gravity – DSS-HRA took swift steps to ensure program continuity during and throughout the pandemic. These program reforms and pivots were meant to ensure that no vulnerable New Yorker was turned away from the public benefits they needed to get through the health emergency and economic downturn.

For example, it has also been a longstanding goal to improve client access by transitioning from using only in person interviews as part of the Cash Assistance application requirement, and shift to allow for these interviews to occur by telephone at the client's choice, just as we are permitted to offer SNAP, clients pursuant to Federal and State waivers that we previously received. At the start of the pandemic, DSS-HRA was granted a state waiver, with support from hundreds of reassigned staff members, the agency was able to promptly set up a system for New Yorkers to apply for Cash Assistance online and conduct their interview by phone. This was possible by following the effective blueprint developed in pioneering remote access for SNAP via Access HRA, showing that our efforts to modernize benefit access over time put us in good stead as the

pandemic arrived. What's more, following our persistent advocacy a recent state law has made this remote Cash Assistance option permanent, meaning that clients can conduct all business online and by telephone, making it more convenient for New Yorkers to access the services they are entitled to.

### **Public benefits today – persistent need and demand**

Fast forwarding to today: while New York City continues to recover, we are continuing to see immense demand for DSS-HRA services nearly three years since the pandemic began, and that is highlighted by the record-breaking applications and caseloads we are seeing to this day.

The average number of individuals that received Cash assistance and SNAP each month has been at its highest in the last five years. The fact is that we have seen an unprecedented increase in the average number of applications, which, to stress once more, is also the highest in the last five years, and we are using every tool at our disposal to ensure that we are processing applications as quickly as possible. This increase reflects the reality of the need on the ground as we continue to recover from the economic impact of the pandemic coupled with the expiration of the State's eviction moratorium and pandemic-related federal supports. Consequently, the timeliness rates of services in FY22 were impacted by the expiration of key waivers active during FY20 and FY21.

Our application volumes have persisted at an unprecedented rate. In October 2022, we received over 50,000 SNAP applications, which was an increase of 60% compared to October 2019 and the highest monthly application number since May 2020. We received over 41,000 CA applications in October 2022, a 51% increase over the number we received in October 2019. Despite the unprecedented increase in applications and related challenges, our teams processed more applications and connected more New Yorkers to benefits than in recent years. We are squarely focused on addressing the need on the ground and ensuring that we are serving every New Yorker in need. To do so, we continue hire staff to fill our vacancies while also finding ways to better optimize our existing resources across the agency.

We are also working closely with our State partners to request further waivers and easements that will assist in our ability to process cases more quickly We continue to further streamline processes related to our remote platforms such as Access HRA and phone interviews for recertifications to do everything we can to minimize delays. Unprecedented need has outpaced our resources, and we are using every tool and strategy at our disposal from seeking program waivers, to implementing technological solutions, reassigning, and hiring staff to meet the demand.

It is worth noting here that DSS- HRA staff were able to help get an unprecedented level of resources to New Yorkers throughout this economic and health emergency. Over \$5 billion in SNAP benefits were distributed to New York City residents in 2021, nearly 50% more than the year before and we are on pace for similar levels this year, due to pandemic relief.

Before I discuss the legislation under consideration, I want to take a moment to highlight the incredible work of DSS-HRA staff over the past three years. In the face of a global health pandemic, DSS-HRA staff worked tirelessly to process benefits applications to ensure their fellow New Yorkers received essential benefits and supports. Their work continues to this day to support New Yorkers impacted by the current economic realities and I want to thank each and every one of them for their dedication to vulnerable New Yorkers in need.

## **Legislation under consideration**

Moving to legislation, we are reviewing the ideas proposed within the bills on the agenda and we look forward to learning more about their intent.

### **Introduction 641**

Introduction 641 intends to maximize the efficiency at DSS-HRA centers by proposing several staffing and management systems. We are currently reviewing this legislation and its impacts. Based on a preliminary review, the bill doesn't reflect the on-the-ground operations and needs of our centers, which raises concerns. As we discuss these proposals, we want to highlight the work and reforms that DSS-HRA has taken to improve the client experience. Following the passage of Local Law 169 of 2019, we worked closely with the Council to conduct a comprehensive audit focusing on operations and procedures at DSS-HRA Benefits Access Centers and SNAP Centers, with the goal of identifying efficiencies and improving the client experience at these centers. This audit, published in March of 2020, highlighted the many reforms DSS-HRA has put into place to improve center operations, and how we have advanced our "no wrong door" service delivery approach.

DSS-HRA continues this work by implementing an aggressive plan to modernize the way our programs and services are accessed. With the launch of Access HRA, we have created dozens of case specific points of information online in real-time for our clients, which expands access, increases flexibility, and opens resources at our centers for those New Yorkers who are most in need of individualized, person-to-person, attention. Our efforts to improve service-delivery have also extended to our Cash Assistance program. Earlier this year, as previously mentioned, we worked with the State legislature to make permanent our COVID-19 waiver allowing clients the option to have telephone interviews to apply and recertify for Cash Assistance, without the need to go into one of our centers. This change now provides Cash Assistance clients with the same option that SNAP clients have had through our on-demand telephone interview system since 2016, giving them the option to apply and recertify for benefits without the need to travel to a center. Overall, these ongoing efforts have enhanced the client experience, and we look forward to working with the Council and bill sponsor to build upon this progress.

### **Introductions 703 and 704**

Introduction 703 proposes reporting regarding when rental assistance payments are made to landlords on behalf of tenants. While the bill seeks to track the timeliness of rental assistance payments, it doesn't seem to recognize the workflow, and nuances, behind payment delivery at

its various stages, and the reasons for potential delays. We look forward to discussing this proposal further with the bill sponsor. We are also eager for the continued roll out of our new Landlord Management System, CurRENT, which is under development and will include a landlord portal that will allow all NYC landlords to opt into electronic funds transfer and to see a record of payments processed.

Moreover, as our agencies have voiced before, we have concerns about the administrative burden this reporting bill would introduce given the resource-intensive demands behind collecting this information. We would like to focus our resources on improving the process for clients and landlords rather than engaging in an exercise that will not in and of itself make changes to these processes

Introduction 704 proposes changes in relation to the streamlining of rental assistance payments. We look forward to discussing this proposal with its sponsor, as well, as we believe that our ongoing efforts to streamline rental payments for landlords, including full implementation of CurRENT will achieve the goals that we all share and may preclude the need for this legislation.

Thank you for the opportunity to testify today on our work to connect New Yorkers in need to public assistance benefits. We look forward to our continued collaboration and any questions that you may have today.



Testimony of Win (formerly Women In Need, Inc.)  
for the New York City Council Committee on General Welfare  
in Support of Intro 704

Thank you to Chair Ayala and to the esteemed members of the Committee on General Welfare for the opportunity to offer testimony. We would like to express our strong support for Intro 704, which would amend the City's administrative code to require that the Human Resources Administration (HRA) provide landlords the option to accept rental assistance payments via an electronic transfer. Thank you to Council Member Abreu for introducing this important bill.

Win is New York City's largest provider of shelter and services to families with children experiencing homelessness. We operate 14 shelters and in total house over 14 percent of families experiencing homelessness with children in New York City, nearly 5,200 individuals per night. In the last year, our staff of trained case managers, housing specialists, social workers, and income building specialists worked to move just over 840 families out of shelter and into permanent homes. Rental assistance programs and vouchers issued by HRA have been key to this success. These subsidies are widely recognized as one of the most effective tools to combat homelessness. When they can be accessed and utilized, vouchers have the potential to stabilize low-income households struggling to pay rent and to provide those in shelter with a path to permanent housing.

However, while rental assistance programs are an essential tool in preventing and ending homelessness for families, the processes to apply and use them are rife with inefficiencies and delays. A litany of administrative issues, like the current reliance on paper checks for payments, continues to undermine these programs. Win is therefore committed to reforming HRA's rental assistance payments process for our families, and we urge City Council to enact Intro 704 and mandate that the agency provide landlords with the option to accept rental assistance payments via an electronic transfer.

As it currently stands, the payment process for HRA to provide rental assistance to landlords causes extreme delays for tenants seeking assistance to remain stably housed. After a family has applied and been approved for a rental assistance program, HRA must pay the landlord so that the family can continue living in their home. While this should be a quick payment process, delays often occur. For families at risk of being evicted and becoming homeless, these holdups can cost them their home and force them into shelter. A major source of these holdups is the requirement that payments must be made by physical checks, even though electronic transfer is a technology that landlords use regularly and have come to expect from tenants. Intro 704 provides a commonsense solution to this problem, and an electronic option to make payments will undoubtedly expedite the rental assistance process for families and keep more people in their homes.

For families living in shelter who rely on an HRA rental assistance voucher to move out, these delays in processing paper check payments can prolong a family's stay at shelter. Once HRA approves a family for a rental assistance payment program, the City must pay the landlord so that the family can move into their apartment. Per the current protocol, HRA checks can either be mailed to the landlord or picked up by the family's shelter provider at the City's downtown Manhattan office. Although DSS has indicated that



it should take about seven days for checks to be delivered to landlords, it often takes much longer. Since waiting for HRA to mail checks can take weeks and jeopardize a family's new apartment, shelter providers instead often opt to go out of their way to secure the payments in person. Once the provider picks up the checks, they must hand deliver them to landlords. This prolonged paper check process causes extensive and unnecessary delays as well as logistical hardships for DHS and shelter providers whose staff are already stretched thin.

Holdups in the housing process can result in unnecessary trauma for families and excessive expenses for the City. While shelter staff at organizations like Win work to provide intentional and trauma-informed care to all clients, the perilous experience of homelessness has an inherent impact on families and children. The stress of experiencing homelessness can cause or exacerbate anxiety, depression, and other mental health issues.<sup>1</sup> For children, especially, the impact can be profound. Children experiencing homelessness are more likely to have poor physical and mental health and are at heightened risk for intimate partner violence, addiction, and depression.<sup>2</sup> Attendance rates for students living in shelter are almost 11 percent lower than their permanently housed peers.<sup>3</sup> Homelessness also takes a significant toll on the City as a whole. The average daily cost to house a family in New York City Shelter is \$188, while CityFHEPS vouchers cost just \$72 daily, a savings of \$116 per day or nearly 62 percent.<sup>4</sup> For every week that a voucher eligible family remains in shelter as opposed to moving into an apartment with CityFHEPS, it costs the city \$814, equaling \$42,328 a year per family. For New York City, optimizing rental assistance payment programs is both just and economical.

We therefore applaud the City Council for considering Intro 704 and thank Council Member Abreu for introducing this commonsense legislation. Intro 704 is a continuation of the critically important campaign to reform the City's rental subsidies currently being advocated for by a large coalition of organizations. A seemingly minor administrative change can have major real-life repercussions for our families, as well as our direct care staff. These payments play a pivotal role in ending New York City's homelessness crisis, and Win continues to be committed to a multi-year advocacy campaign to improve and expand these programs, particularly the CityFHEPS voucher. Thanks to Win and our partners' efforts, in May 2022 the value of a CityFHEPS voucher for a family of three grew nearly 60 percent, from \$1,580 in May 2021 to \$2,527, and it will continue to increase proportionally to the New York City Housing Authority's (NYCHA) payment standards, which are set between 90 and 110 percent of Fair Market Rents.<sup>5</sup> Increasing the value of the CityFHEPS voucher was an important step in our goal to reform the voucher process, and Intro 704 will build on this success to further optimize these programs and make permanent housing more accessible for homeless New Yorkers.

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<sup>1</sup> "Mental Health," *Ruff Institute of Global Homelessness*. 2017 <https://github.org/understanding-homelessness/causes-intersections/mental-health#:~:text=Homelessness%2C%20in%20turn%2C%20amplifies%20poor,depression%2C%20sleeplessness%20and%20substance%20use>.

<sup>2</sup> "No Longer Hidden: The Health And Well Being of Homeless High School Students," *Institute for Children, Policy & Homelessness* October 31, 2019. <https://www.icphusa.org/reports/>

<sup>3</sup> "Still Disconnected: Persistently Low Attendance Rates for Students in Shelter," *Advocates for Children of New York* May 18, 2022. [https://www.advocatesforchildren.org/sites/default/files/library/still\\_disconnected.pdf?pt=1](https://www.advocatesforchildren.org/sites/default/files/library/still_disconnected.pdf?pt=1)

<sup>4</sup> Ella Ceron, "NYC Mayor Urged to Abolish 90-Day Shelter Rule Amid Migrant Influx," *Bloomberg* November 20, 2022 <https://www.bloomberg.com/news/articles/2022-09-20/new-york-mayor-eric-adams-is-pressured-to-abolish-homeless-shelter-rule?leadSource=uverify%20wall>

<sup>5</sup> "Voucher Payment Standards and Utility Standards," *New York City Housing Authority* June 1, 2022 <https://www1.nyc.gov/site/nycha/section-8/voucher-payment-standards-vps-utility-allowance-schedule.page>



Breaking the Cycle of Homelessness  
for Women and their Children

Intro 704 is an excellent initiative to modernize the rental assistance payment process and save families weeks of potential delays while checks are processed. This small administrative amendment will be a large step forward in optimizing an outdated system. In the future, we look forward to working with City leaders to tackle other issues that still plague the voucher programs. We still hope to see additional important changes, such as ending the 90-day rule and investing in staff to streamline the approval and issuance processes for rental assistance. Intro 704 and subsequent changes will ensure that these rental assistance programs live up to their full potential, and we urge City Council to pass Intro 704 and halt the cycle of housing instability and homelessness for New York's most vulnerable residents.



**Testimony of Juan Diaz, Policy Associate  
Citizens' Committee for Children of New York**

**Submitted to the New York City Council Committee on General Welfare  
Oversight Hearing - Timeliness of Public Benefits Processing at the Human Resources  
Administration**

**December 15th, 2022**

Thank you, Chair Ayala, and members of the City Council Committee on General Welfare for holding this important oversight hearing.

My name is Juan Diaz, and I am a Policy and Advocacy Associate at Citizens' Committee for Children, a multi-issue children's advocacy organization dedicated to ensuring that every New York child is healthy, housed, educated, and safe.

Since 1945, Citizens' Committee for Children of New York has served as an independent, multi-issue child advocacy organization dedicated to ensuring that every New York child is healthy, housed, educated, and safe. CCC does not accept or receive public resources, provide direct services, or represent a sector or workforce. We document the facts, engage, and mobilize New Yorkers, and advocate for policy, budget, and legislative solutions that improve child and family well-being.

CCC is also a Steering Committee member of the Family Homelessness Coalition, a coalition of 20 organizations representing service and housing providers and children's advocacy organizations, united by the goal of launching a coordinated, collaborative, multi-agency effort focused on preventing family homelessness, improving the well-being of children and families in shelters, and supporting the long-term housing stability of families with children who leave shelter.

Today's City Council oversight hearing underscores the need to improve the timeliness of services and safety net assistance for New Yorkers. New York City is facing a dire family homelessness crisis, and there is an urgent need to improve policies and programs to alleviate the struggles of families at risk or suffering from homelessness and income insecurity. Public benefits like SNAP, TANF, and housing subsidies are essential to a family's well-being, and are often the primary support for thousands of vulnerable New York City families.

The 2022 annual Mayor's Management Report shows that only 60 percent of SNAP applicants received timely application and approval services. This is a deeply troubling drop considering that in Fiscal Year 2021, 92 percent of applicants received services in a timely manner. Additionally, several essential City agencies have staff vacancies near 20 percent.<sup>1</sup> These figures are concerning because staffing in HRA programs is insufficient to meet the needs of low-income families – especially families of color -- who have a greater need for timely services and benefits in the face of a 40-year high inflation rate. We can see the effects of service inefficiencies when heads of households are constantly spending several hours and even days at HRA's Job Centers citywide, seeking safety net assistance. Many are often turned back or directed to their local social services providers when only HRA can assist with TANF and FHEPS prevention assistance.

Below, we offer recommendations for how the City can improve timeliness of public benefits processing and streamline the ability of families to access critical services.

**CCC strongly supports the following CityFHEPS reforms that would help improve timeliness of benefits access for families with children in need of housing assistance.**

- A key strategy for improving timeliness of benefits access is to end the 90-day shelter stay rule that requires individuals to be in shelter for 90-days before becoming eligible for CityFHEPs. Eliminating this rule will allow more individuals and families in need to access vital housing vouchers. We urge you to continue your support for eliminating this illogical and costly administrative rule.
- Expand CityFHEPS eligibility for undocumented families that are disproportionately at risk of housing insecurity and homelessness. This administrative reform will provide housing stability for children who lack immigration status and suffer from educational and economic disadvantages compared with the rest of the city population.
- Eliminate chronicity eligibility requirements such as requiring shelter history or a housing court eviction to receive CityFHEPS. Eliminating these unnecessary requirements will allow the city to better leverage the subsidy as a preventive measure and keep housing insecure families in their homes and out of shelter.

**Reject agency reductions or PEGS that would negatively impact funding or staffing necessary to secure housing stability and support safety net services for families.**

The severe understaffing at agencies citywide calls for the preservation and enhancements of current funding to help combat the current shelter and housing crisis in New York City and ensure that New Yorkers are not experiencing delays in receiving essential safety net supports. Further, cutting benefits access positions at HRA does not save City tax levy funds because these roles are funded by federal dollars. In fact, eliminating positions at HRA and DHS may cost the City money if we fail to spend down federal revenue streams supporting these critical roles. CCC urges the City Administration to accelerate the hiring process at DSS to expedite the CityFHEPS application approval process and to ensure adequate staffing at the Source of Income Unit at the Commission on Human Rights.

**CCC also supports the legislation being heard in this hearing that would help expedite safety net applications and subsidies rental payments to landlords.**

- **Int 0704-2022 - (Abreu)** The bill would require the Human Resources Administration to provide landlords the option to accept rental assistance payments via an electronic transfer into a bank account.

Social services partners have shared landlord concerns over the chronic delays in rental assistance payments, both in shelter and in the community. There is constant confusion over checks distribution when housing subsidies are approved, resulting in families experiencing delays in receiving rental assistance. The checks disbursement process could be significantly improved by implementing a direct deposit system like the one proposed by Councilmember Abreu.

- **Int 0703-2022 - (Abreu)** The bill would require the Human Resources Administration (HRA) to submit quarterly reports on whether rental assistance payments for programs established by HRA are sent on time to landlords on behalf tenants receiving assistance.

Ensuring that rental payments are made promptly is a major step to addressing housing instability for families who receive HRA-administered housing subsidies. The quarterly reports will help HRA maintain a record of payments made and payments that have been missed, which will ideally trigger a prompter response to ensure payments are made and avoiding tenant/landlord disputes.

- **Int 0641-2022 - (Williams)** This bill would require all job centers and SNAP centers to have an expeditor on site when clients are being served or waiting to be served. Expeditors would be tasked with checking-in clients, performing a preliminary review of clients' documents to ensure clients have all necessary documents, and directing clients to the appropriate line or waiting area. This bill would also require all such centers to be equipped with digital displays and an audio amplifier.

Heads of household have testified at this hearing on the need to expedite the public benefits application process. This is a concern shared by thousands of other families and individuals who spend several hours or even days seeking safety assistance at SNAP and HRA job centers citywide. The expeditors will serve as direct contact for initial assessment of documentation and guidance, which in turn would expedite and improve the public benefits application process.

CCC also urges city leaders to address the urgent need to hire more bilingual personnel at HRA's Job Centers to assist heads of households in desperate need of assistance. Homebase providers and clients have expressed concerns over the lack of Spanish-language assistance and other language supports at HRA Jobs Centers citywide.

Thank you for the chance to testify and for advocating for improving the public benefits processing system.

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<sup>i</sup> NYC delays in SNAP benefits and high vacancy rates at HRA. Retrieved from:  
<https://citylimits.org/2022/11/10/40-of-nyc-food-stamp-applicants-left-waiting-for-benefits-data-shows/>



Testimony of

**Coalition for Homeless Youth**

on

Oversight: Timelessness of Public Benefits Processing at the Human Resources Administration

Intro. 0641-2022

Intro. 0703-2022

Intro. 0704-2022

Submitted to

The New York City Council's Committee on General Welfare

By

Jamie Powlovich  
Executive Director  
Coalition for Homeless Youth

December 15, 2022

Good morning. My name is Jamie Powlovich, I use she and her pronouns, and I am the Executive Director of the Coalition for Homeless Youth (CHY), also known as the Empire State Coalition of Youth and Family Services. The Coalition for Homeless Youth has advocated for the needs of runaway and homeless youth (RHY) for almost 45 years and has a statewide membership including 29 members here in New York City. Thank you, Deputy Speaker Ayala, and members of the Committee on General Welfare for holding today's hearing, and for the councils ongoing support of youth experiencing homelessness in New York City.

Since modern homelessness began in the late 1970s, homeless youth have faced the reality that the City does not provide enough age-appropriate shelter and largely leaves them out of access to permanent housing options. Under the previous administration some improvements were made in addressing the needs of RHY, however, the harsh reality is that there are still nowhere near enough resources provided by the City to meet the needs of its homeless youth. The lack of a right to youth shelter (for all youth), the relatively small number of beds in the City's RHY continuum, as well as the marginal number of age-specific beds in the Department of Homeless Services (DHS) system, all present major gaps that cause too many young people to fall through system-based cracks. The ongoing lack of coordination between City agencies serving homeless young people only makes this situation more difficult for youth reaching out for help.

The lack of almost any available subsidized exit from DYCD facilities – partially a result of the historic ping-ponging of responsibility for homeless youth between City agencies, which has meant that those relying on the DYCD programs are typically left out of permanent housing options. This leaves the City's homeless young people often circling in-and-out of DYCD programs, sometimes ending up in the DHS shelter-system or domestic violence shelters operated by the Human Resources Administration (HRA), and often ending up on the streets as homeless adults. For many homeless youth this is preventable if the City turns its attention their way. Had there been a subsidized permanency option available to them in DYCD facilities as younger adults, there's good reason to believe they may not have entered the DHS or HRA systems.

### **We must focus on housing**

In a study completed by the Center for Innovation through Data Intelligence (CIDI) that looked at outcomes for youth in the Administration for Children's Services (ACS), DHS and DYCD systems between 2008 and 2013, analysts found that "Having a subsidized exit substantially reduced the likelihood of both future system use and being a high service user in all models—by about two-thirds and 85%, respectively.<sup>1</sup>" Access to subsidies is a life-changing matter. Currently, homeless youth relying on homeless youth services (DYCD) are one of the only homeless sub-populations in New York City that has been left with virtually no option for permanent housing to help them exit homelessness. And although youth in DYCD programs currently have access to a set allocation of Emergency Housing Vouchers (EHV), and a small number of CityFHEPS pilot vouchers, neither is permanent. Youth relying on DYCD's homeless youth programs currently have no ongoing access to local housing subsidies like CityFHEPS. These young people do not receive any priority access to NYCHA units, or priority access to non-EHV Section 8 subsidies. Youth eligible for supportive housing also face significant barriers to

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<sup>1</sup> <https://www1.nyc.gov/assets/cidi/downloads/pdfs/housing-trajectories-of-transitionage-youth.pdf>

accessing a unit, and there has been ongoing difficulty ensuring fair access to supportive housing interviews and acceptance for homeless young people, particularly those with serious and persistent mental illness. The latter issue is not solely a result of the dearth of available supportive housing, but also a result of referral decisions made by City agencies and cherry-picking/creaming at the provider-level.

It is clear that housing support is needed.

### **Intro. 0641-2022, Intro. 0703-2022 & Intro. 0704-2022**

The Coalition for Homeless Youth is in full support of all three pieces of legislation.

### **CityFHEPS Voucher Access**

Despite many broken promises, youth experiencing homelessness in the DYCD-funded RHY programs, as well as youth transitioning out of care with the ACS still DO NOT have equal access to CityFHEPS vouchers.

On November 23, 2021, council passed two groundbreaking pieces of legislation, intros 2405-A<sup>2</sup> and 148-B<sup>3</sup>. In April of this year Local Laws 170 and 157 went into effect making youth experiencing homelessness in the DYCD-funded RHY programs as well as youth transitioning out of ACS care eligible for CityFHEPS vouchers without having to first enter DHS shelters. For runaway and homeless youth specifically, this was celebrated as a significant victory by the council and the community.

Unfortunately, we have been informed that DSS/DHS is not moving forward with what CHY believes is required under the laws -- meaning that DYCD-RHY and ACS youth would get access to CityFHEPS vouchers without having to enter DHS shelter, and that they would be awarded the same DSS-administered (funded) vouchers that individuals in the DHS and HRA shelters get. DSS/DHS is instead going to continue to force young people into the DHS shelter system before they can access vouchers – even if they are otherwise eligible. More specifically their interpretation is that:

1. The legislation allows for time in DYCD-RHY programs or ACS to count towards the 90-day requirement, but that the youth would have to still enter DHS shelter to be awarded a voucher. This is the exact opposite of the intent of the legislation when we fought for it to be passed. Also, if true, it would mean that all the legislation would be doing, at least for RHY, would be to solidify a process already happening through an MOU<sup>4</sup>.
2. That the phrase "Subject to appropriation..." in the laws means that in order for RHY or ACS youth to access vouchers directly, ACS/DYCD would need to advocate for funding with OMB to cover the cost of administering vouchers to their respective populations. During the negotiation process with the admin prior to the bills aging, the admin insisted on including this language, despite concerns being raised that what is now happening, would happen. At that time, we were assured by the admin that it was boilerplate language that was included on many pieces of

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<sup>2</sup> <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=5146237&GUID=1A2F9094-0130-46E0-9C4A-D9A5AC55F8A5&Options=ID>

<sup>3</sup> <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=3331970&GUID=FFD262A3-0EF3-4E53-819A-4FD46EECEF43&Options=&Search=>

<sup>4</sup> <https://www.documentcloud.org/documents/20785760-dhs-hra-dycd-cityfheps-mou>

legislation implicating entitlement programs, and that it DID NOT indicate their intent to no fully implement the provisions of the legislation.

Let us be clear. Youth in the RHY system are homeless. PERIOD. And by the City requiring them to move from one shelter system to another to access a way out of homelessness is not only cruel, it makes no sense. At a time when the DHS shelter census is at an all-time high, why is the administration forcing young people into the DHS system unnecessarily?

DSS's interpretation of the laws is not only a slap in the face to the youth, programs and advocates that fought for these bills to be passed, but it is also another clear example of how in New York City homelessness = DHS, when in fact homelessness is a traumatic experience that far too many people endure in this city, and we believe resources should be based solely on that lived experience and not the system that you enter.

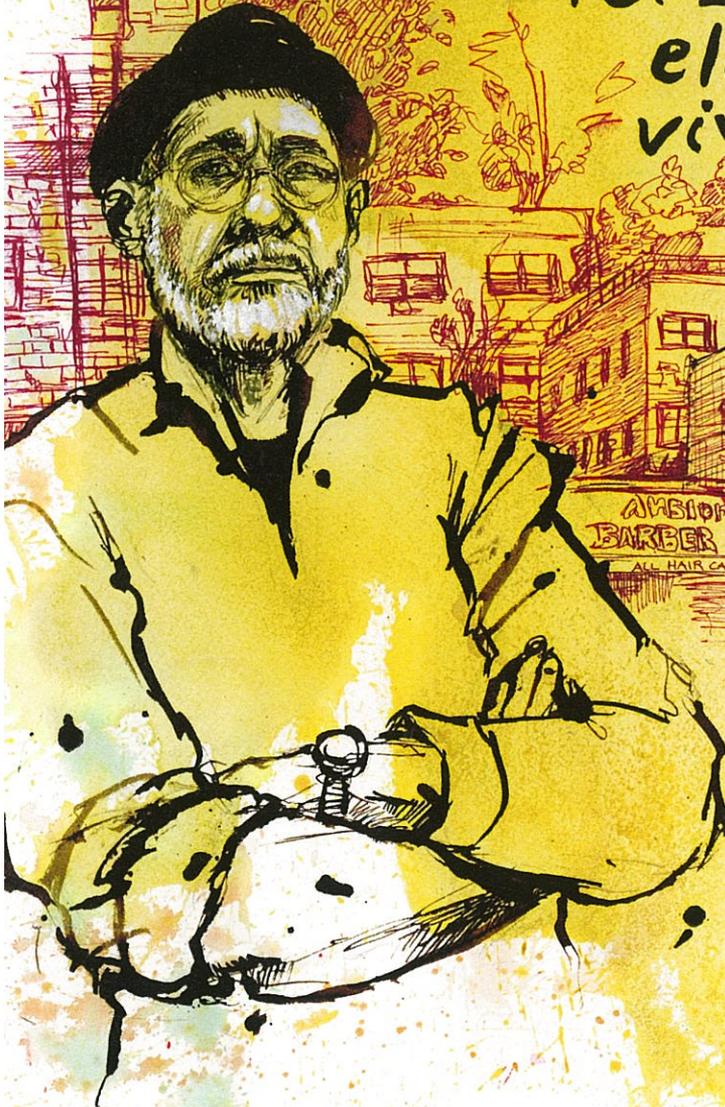
Since the city initially promised youth experiencing homelessness in the DYCD RHY system access to vouchers in 2016, 8,102 youth have been discharged from the youth shelter system into another homeless shelter or situation<sup>5</sup>, that we know of. That is over 8,000 missed opportunities the City had to change the outcome for a youth experiencing homelessness, and they failed.

Thank you for the opportunity to testify before you today. I am happy to answer any questions that you may have.

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<sup>5</sup> Data pulled from Department of Youth & Community Development Local Law 86 reports for Fiscal Years 2017-2022. Reports can be found here: <https://www.nyc.gov/site/dycd/about/news-and-media/reports-plans.page>

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ellos  
viven



# Our Homes, Our Power

With New Yorkers facing a housing crisis of historic proportions, tenants and homeless New Yorkers are coming together to demand Albany fundamentally transform our housing system to ensure everybody in New York can afford a safe and decent home.

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**Good Cause Eviction Protections:** Give New Yorkers more power to fight exorbitant rent increases and unjust evictions.

**Housing Access Voucher Program:** Set up a statewide rental subsidy program for low-income New Yorkers.

**Tenant Opportunity to Purchase Act:** Lets tenants buy their building by giving tenants a right of first refusal for rental buildings that are going up for sale.

**Emergency Tenant Protection Act and Rent Guidelines Board Reforms:** Make the process for determining rental rates for rent-controlled and rent-stabilized apartments more fair and democratic.

**Social Housing Development Authority:** Create a pathway to build publicly-backed housing that is insulated from market forces and lets residents exert democratic control over their homes.

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We can't just wait for the real estate industry to solve the crisis. We have to come together to demand that Albany pass real solutions that uplift all New Yorkers.

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**Homeless Services United's Written Testimony Submitted to**

**The NYC Committee on General Welfare Hearing on December 15<sup>th</sup>, 2022 on Timeliness of Public Benefits Processing at the Human Resources Administration**

My name is Eric Lee and I'm the director of policy and planning at Homeless Services United. Homeless Services United (HSU) is a coalition representing mission-driven, homeless service providers in New York City. HSU advocates for expansion of affordable housing and prevention services and for immediate access to safe, decent, emergency and transitional housing, outreach and drop-in services for homeless New Yorkers. Thank you, Deputy Speaker Ayala and members of the General Welfare Committee, for allowing me to testify today.

HSU is grateful to Deputy Speaker Ayala and members of the Council for your continued leadership on issues impacting access to homeless services and public benefits, and thank you for holding this timely hearing focused on issues impacting timely access to public assistance and rental assistance payments processed by HRA. **In short, households applying for public assistance benefits, one-shot deals, and rental assistance are unable to get timely access to the help they need because HRA does not have enough staff to handle the immense caseloads.**

While we appreciate the intent of Int. 641 to dedicate HRA staff to assist clients with navigating HRA Centers, the underlying cause of the disfunction is chronic understaffing of frontline positions. **Households are becoming homeless or kept in shelter longer than necessary because there are simply not enough HRA workers to conduct interviews and process paperwork. HRA's Public Benefits Access Centers do not have sufficient staff to quickly process Public Assistance applications and CityFHEPS recertifications, FHEPS applications and modifications, manually index client documentation, or conduct phone interviews. As a result, applicants are seeing their Public Assistance applications denied or cases closed, One-Shot Deals denied, their on-going CityFHEPS fail to renew, and households at risk of eviction or in shelter unable to qualify for rental assistance vouchers like CityFHEPS or FHEPS.**

This staffing deficiency at HRA's Benefits Access Centers should be treated like the crisis it is, akin to a shortage of emergency room doctors or other critical City staff. New Yorkers are being harmed by the City's inability to provide them essential benefits and housing resources, not for lack of the resources themselves but because of lack of person power to process the applications and paperwork. Households can't eat retroactively when SNAP benefits are delayed, as several people testified at the hearing.

It is also important to note, ***given the Mayor's directive to City agencies to halve the number of vacancies within their agencies as a cost-savings measure, that there would be little to no realized savings in City funds for Federally funded positions, as was the case when HRA previously reduced their Medicaid staffing vacancies.***<sup>1</sup>

A corrective action plan from HRA is needed to remedy staff deficiencies for processing public benefits and rental assistance, detailing what bottlenecks exist to hiring these positions, what steps the

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<sup>1</sup> Findings from City Budgets, per Council Finance



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Administration has already undertaken to accelerate the process, and possible next steps including waivers for usual hiring practices which can be implemented to quickly close the gap.

Without sufficient levels of front-line staff at HRA to process applications and conduct interviews, households will not be able to get the assistance they need in time to stop an eviction, or even see their stable housing jeopardized because HRA failed to process their CityFHEPS renewal paperwork, causing the voucher to expire and rental arrears to accrue. And while the administration noted that HRA wages for frontline positions paid between \$40,000 and \$47,000, which the Council felt was too low to attract and retained qualified staff, we would be remiss to not note the need for widescale wage reform for all City-contracted non-profit workers, as DHS-contracted wages for shelter staff are often even lower while not including pensions or comprehensive healthcare benefits afforded City employees.

Delays from HRA Benefit Centers are having a ripple effect for tenants to be able to get help from Homebase providers. Without HRA being able to process their benefits and rental assistance applications and paperwork in a timely manner, cases are churning through Benefits Centers, taking precious time for households in crisis and multiple applications and follow-ups by applicants and Homebase staff to finally get things approved. These delays also indirectly impact other tenants' ability to access Homebase services, as Homebase staff must spend more time following up with HRA to resolve a case, time which could have been spent assisting other households.

That is not to say that if not for HRA delays, Homebase would be in a good position to meet the current need. Currently Homebase programs are also struggling with high vacancy rates and staff turnover, including more than 50% turnover at one program. Faced with overwhelming need and limited staff, Homebases are prioritizing households at immediate risk of eviction including those that received Marshall's notices and giving appointments to less urgent cases which could be weeks or even over a month away. Homebases need more resources from HRA to meet the current need. There are a couple options to reduce wait times and expand services, including redesigning Homebase RFPs to expand staff and right-size compensation rates to address vacancies and turnover, opening additional Homebase locations within higher needs communities, or creating new community-based programs or distinct units within Homebase programs which solely focus on in-community rental voucher assistance.

### **Delays Accessing Rental Assistance:**

With regards to rental assistance delays, it may not necessarily be that payments are delayed, so much as the format for issuing payments is complicated and confusing for landlords. For individuals who receive a shelter allowance, payments are sent to landlords as an "A" and "B" payment each month, with each payment date based on the last digit of the individual's welfare case number. For example, cases with 1 have shelter allowances mailed on the 1<sup>st</sup> and 15<sup>th</sup> of the month. In addition, rental assistance checks are also issued as separate payments which could also be broken up into multiple checks as well. FHEPS rent payments are sometimes split into 2 checks, and initial payments for CityFHEPS To Move would include the first month's rent plus 3 additional months upfront rent, split across multiple checks.

**HSU supports Int. 704 to create and Electronic Fund Transfer (EFT) option for landlords to receive rental assistance payments.** But as noted with the overly complicated way that the City breaks up



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payments, there must be sufficient detail provided with electronic payments to clearly attribute them to the tenant and address of tenancy to ensure correct attribution of rent payments.

**In general, the timeliness of Cash Assistance, FHEPS, and CityFHEPS payments is not the issue, so much as problems with someone's Public Assistance case affecting those payments.** When someone's Public Assistance (PA) case closes, the Welfare Management System (WMS) automatically drops payments for the shelter allowance and FHEPS voucher and prevents FHEPS and CityFHEPS from being added to non-active status cases. Thus, the issue is not with HRA's Landlord Ombudsman Services Unit (LOSU) which is responsible for issuing payment, but with opening and maintaining uninterrupted public assistance cases by preventing and minimizing errors that result in sanctions or case closures and having sufficient staff at HRA Public Benefit Access Centers to quickly address problems for PA recipients when issues do arise.

**A helpful public report to track access to public assistance would be a monthly report which detailed staffing levels for different frontline staff positions responsible for interviewing and processing applications and documentation, and the performance of each HRA Public Benefits Access Center,** disaggregating how many households each location opened Public Assistance cases for, how many households applied for Public Assistance, how many cases were closed at each center disaggregated by reasons for closures, the number of telephone interviews completed, CityFHEPS renewals processed, FHEP applications and modifications made, average number of days it took to make a PA phone interview, and number of files indexed, and number still outstanding.

To open an active Cash Assistance case, clients must first submit an application either through ACCESSHRA or at an HRA Public Benefits Access Center, followed by a telephone interview which is conducted by staff from HRA Public Benefits Access Centers. Prevention and shelter providers both report clients are either not receiving a PA phone interview within the allotted 7-business day timeframe or any call whatsoever from HRA, which results in their Case Assistance case being rejected for **"Failure to Keep/Complete Interview: No Schedule Appointment"**. **This was the number one reason given why Cash Assistance cases were rejected by HRA, accounting for 17,557 out of 50,917 total rejections for April through June of this year!**<sup>2</sup> While some portion of these could be due to the client not picking up, it should be noted that the number often shows as blocked, and no timeframe is given for day or approximate time to expect the call.

It should also be noted that while HRA testified that they recently instructed interviewers calling from Benefits Access Centers to leave a message with their office number, HRA interviewers making calls remotely from cell phones do not leave their call back number. Instead, clients who don't talk to HRA within 7 days should call a general line to reschedule the interview and sit by the phone again waiting for HRA to call. Clients have won fair hearings where "Failure to Keep/Complete Interview: No Schedule Appointment" was the reason for their case rejection by providing phone records proving they did not miss a call from HRA. This lack of Public Assistance telephone interviews does not just affect on-going Cash Assistance applicants. Tenants applying for a One-Shot Deal also must complete a Public Assistance

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<sup>2</sup> <https://www.nyc.gov/assets/hra/downloads/pdf/news/11168-170/fy22q4/2022-Apr-Jun-CA-4-Case-Rejections-by-Council-District.pdf>



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telephone interview, and households cannot apply for rental assistance including FHEPS or CityFHEPS without a Public Assistance case open. **Public Assistance phone interviews should be on-demand, like SNAP interviews, and HRA should hire up enough staff to be able to meet that expansion of service delivery.**

One example in which rental assistance access is hindered by staffing deficiencies at HRA Benefits Access Centers is the **difficulty getting a CityFHEPS voucher for someone who is ineligible for Public Assistance**. PA is not an eligibility requirement for CityFHEPS, but in order to get it added to budget, HRA must open a temporary PA case in “Single Issue” (SI) status. Single Issue PA cases automatically close within 30 days, meaning that the entire CityFHEPS process must be completed within that timeframe- the HRA Benefits Access Center staff must conduct an interview for the Single Issuance, then HRA’s Rental Assistance Program (RAP) Unit must approve the CityFHEPS application, and finally the Landlord Ombudsman Services Unit (LOSU) issue payment. **Because of delays in PA phone interviews, these single issue cases might close before the interview occurs or take so long that the other two steps do not have enough time following the interview to complete the process before the PA case closes, forcing the client to have to go back to HRA to reapply for another Single Issuance and start the process all over again.** Even worse, HRA may not always tell the provider or applicant that the Single Issuance closed and that they need to reapply.

Homebase providers are also noticing up to **4-to-5-month delays for HRA Public Benefits Access Center staff to process CityFHEPS recertifications, resulting in tenants’ vouchers ending despite their submission of renewal paperwork within the allotted timeframe.** Renewal notices are mailed to CityFHEPS voucher holders 5 months before the annual deadline to renew, with instructions to renew via snail mail, email, or hand delivering to an HRA Benefits Access Center. Tenants submitted their completed renewal forms to HRA before the deadline, but they are not being processed by HRA Center staff before the deadline, resulting in CityFHEPS falling off their budget. Tenants try going to an HRA Center to no avail, and ultimately end up at Homebase who also tries to submit a CityFHEPS renewal to HRA’s Public Benefits Access Centers, flagging it for HRA staff to try to rectify the wholly avoidable housing instability.

**HRA Public Benefits Centers need to do a better job screening households for FHEPS eligibility and processing FHEPS applications and modifications.** Homebase providers have continued to see clients inappropriately referred to them from HRA Centers for FHEPS and FHEPS modifications which HRA Center staff are themselves responsible for completing. Homebase staff have even sometimes helped assemble FHEPS restoration packages for tenants to bring back to HRA in the hopes that a preassembled packet of necessary documents would make them more willing to process the restoration, only to see HRA Center staff still refuse.

As the Administration testified at the hearing, the process to index scanned client documents and match them to applicants’ Public Assistance cases is done manually by hand at HRA Benefits Access Centers. People can upload documents via ACCESSHRA or scan them at the Centers, but until they are properly indexed to their cases, it appears like their cases are missing documentation. HRA should provide a



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written or electronic receipt of every document uploaded or scanned, as well as a reference code to provide to HRA to quickly locate the submitted documents, should they have trouble locating them in their system. ACCESSHRA also does not support all file types for documents, but it does not message this, and does not provide an error message for submitting unsupported file types. Thus, an applicant may unsuccessfully upload documents and never realize they were not accepted. Consequently, **because of HRA's backlog processing documentation, applicants receive repeated notices for missing documentation which they already submitted multiple times to no avail, and ultimately see their One-Shot Deal application and Cash Assistance applications denied anyway for missing documentation after multiple attempts to provide them.** The administration testified they are looking to automate the indexing process, but we encourage them to think of an immediate solution to work through the backlog such as hiring temps to do the filing, while working towards longer term solutions.

HSU and our providers recognize the overwhelming need for assistance and want to continue to be good partners with the Council and the Department, to quickly address housing instability and secure permanent housing for people at-risk of or currently experiencing the trauma of homelessness. To enable HRA to be able to meet the needs of New Yorkers, we urge the City to enable HRA to quickly staff up vacant positions. Eliminating vacant positions doesn't mean those positions were unnecessary, it just codifies the cuts, leaving fewer hands to do the work. Thank you for the opportunity to submit testimony.

If you have any questions, please do not hesitate to contact me at [elee@hsunited.org](mailto:elee@hsunited.org)



**Testimony of The Legal Aid Society  
Before the New York City Council Committee  
on General Welfare**

**Oversight Hearing on Timeliness of Public Benefits Processing at the Human  
Resources Administration and Consideration of Int. Nos. 703, 704 and 641.**

**December 15, 2022**

The Legal Aid Society appreciates this opportunity to submit written testimony to the New York City Council Committee on General Welfare pertaining to the hearing held on December 15, 2022, “Oversight - Timeliness of Public Benefits Processing at the Human Resources Administration” and pertaining to the following proposed pieces of legislation: Int. Nos. 703, 704 and 641.

As detailed below, thousands of low-income New Yorkers go without SNAP and Cash Assistance benefits to which they are entitled because HRA fails to process applications and recertifications for SNAP and Cash Assistance within the timeframes required by federal and state law. HRA’s pattern of noncompliance with federal law is severe. In August 2022, HRA failed to timely process over *half* of all SNAP applications. *See* <https://dmmr.nyc.gov/city-services/health-and-human-services/human-resources-administration/4116>. In addition, HRA is failing to maintain functional systems to enable SNAP and Cash Assistance households to submit applications and recertifications for these benefits. **These failures both have the same devastating result: families are forced to go hungry or make impossible decisions like whether to pay their rent or feed their children.**

## Part I:

### **Delays in SNAP, Cash Assistance and Rent Arrears/ One Shot Deal Processing**

#### **HRA Delays and System Failures Cause Thousands to Go Without Benefits Every Month – Including SNAP, Cash Assistance Benefits and One-Shot Deals for Rent Arrears**

##### **A. THE PROBLEMS: Delays & Systemic Barriers Force Households to Go Without Benefits**

###### **1. Recertification Delays Force Households Eligible for SNAP Benefits to Go Without and Wait**

Thousands of households receiving SNAP benefits discover their benefits have stopped because HRA has failed to process the recertification paperwork required to continue their benefits. These households are expected to wait until HRA gets around to processing their cases and issuing their benefits. While they wait for HRA to process their cases, these households receive no substitute benefits or food. They go without benefits and miss meals until HRA completes processing on their cases.

###### **2. Application Delays Force Households in Desperate Need to Go Without and Wait**

Thousands of households who are applying for SNAP benefits and Cash Assistance -- including One-Shot Deals for Rent Arrears -- do not receive timely decisions on their applications. They must wait until HRA gets around to processing their applications. Thousands more low-income New Yorkers go without SNAP and Cash Assistance benefits to which they are entitled because their applications and recertifications fall through the cracks of HRA's broken automated administrative processing systems:

- **Forms - Many Households cannot complete the online application and recertification forms – HRA fails to provide real alternatives to ACCESS HRA. Even those who appear in person at HRA must apply online.** Households are expected to use the online system, ACCESS HRA, to apply and recertify and are often impeded by the complex system and in many cases, even blocked by the ACCESS HRA system.
- **Phone Interviews - Many Households are denied or cut off because they cannot reach HRA by phone to participate in their mandatory phone interviews.** For Cash Assistance/SNAP cases, HRA conducts mandatory interviews by calling households from phones that cannot be called back. Households are forced to call

Infoline, HRA's overwhelmed dysfunctional call center which is a disaster: it often cannot be reached and automatically hangs up on calls when call volume reaches certain levels. These failures result in thousands of cases being erroneously denied or closed because HRA says the households failed to participate in a required phone interview.

- **Documents** - Many households are denied or cut off because the required documents they submit to HRA are lost or ignored and HRA fails to check its own records.
- **Expedited SNAP and Immediate Needs Grants** – Many households are not provided with the emergency benefits to which they are entitled by HRA: expedited SNAP benefits to those eligible within seven days and Immediate Needs Grants to those eligible the same day.

**B. Proposed Solutions: HRA Should Develop a Corrective Action Plan Detailing the Steps the Agency Will Take to Eliminate Current Benefit Backlogs – including Steps to Address Staffing Shortages and Systems Barriers**

HRA should provide detailed information about current delays and a detailed corrective action plan to address the delays, so New York City households do not have to go without benefits to which they are legally entitled. In this plan, HRA should be required to provide specific numbers on delays, staffing numbers and a plan on how to eliminate the current backlog.

**1. REPORT ON DELAYS AND STAFFING SHORTAGES**

- **Report on Application and Recertification Processing Delays for each month**  
HRA should be required to report and post on its website: the number of applications and recertifications for each month and the number and percentage decided within statutory deadline of 30 days; and those which are delayed beyond 30 days, 31-60 days, and 61-90 days. The data should also report on those eligible for expedited processing for SNAP benefits because of very low income and resources and HRA's timeliness in responding within the seven-day period required by law and the timeliness for immediate needs grants which must be processed the same day. HRA should also report on the projected delays for the next six months.
- **Report on Staffing Shortages and How they will be Addressed to Eliminate Application and Recertification Backlogs**

HRA should be required to report and post on its website: the number of staff positions that must be filled in order to eliminate current processing delays for applications and recertifications – and without negatively impacting other

HRA benefits including Medicaid. HRA should detail its plans to address the staffing shortages identified.

**2. ADDRESS SYSTEMIC PROBLEMS to enable SNAP and cash assistance households to submit applications and recertifications for these benefits. HRA should be required to:**

- **Address HRA staffing shortages & Reform the Self-Service Model**  
HRA must address staffing shortages which are preventing the agency from meeting legal deadlines. They must process applications and recertifications and provide benefits within the time frames mandated by law. Moreover, HRA should be required to report on the number of staff needed at each of its centers to provide in-person assistance to HRA clients, and HRA should be required to reform its current self-service model so that clients who appear in person are able to receive help from the agency during their visit.
- **Provide Real-Time Help to Users of ACCESS HRA**  
HRA operations are now premised on households using its online system – ACCESS HRA, to apply and recertify for benefits and to get information about their cases. Yet HRA fails to provide ANY actual live support for households attempting to use it. Thus, households who encounter system problems have no ability at all to resolve their issues and get around this barrier. HRA should be required to provide “live” help by online chat, text, and telephone.
- **Provide Realistic Alternatives to Applying Online.**  
HRA should be required to: a) make paper applications widely available b) provide widespread information about the availability of phone applications and train HRA staff on this option and ensure adequate staffing to take phone applications; c) create community partnerships with nonprofit organizations to help New Yorkers apply and recertify for benefits.
- **Conduct phone interviews using reliable, accessible, methods – enable households to call HRA rather than wait for unscheduled calls that from phones that do not accept messages.**  
HRA should be required to provide reliable methods for households to secure mandatory phone interviews – either permit households to secure mandatory phone interviews on their own via an On Demand system or schedule interviews and provide real alternatives of in-person interviews. HRA must not rely on its current overwhelmed and dysfunctional central phone system - Infoline -- as the means by which clients contact HRA to secure mandatory phone interviews if they miss a call from HRA.
- **Replace Infoline Without Delay and Staff it Adequately**  
HRA’s central phone line system is a disaster. The system lacks adequate capacity to meet client needs. HRA reports that the average wait time is 45

minutes just to reach an operator. *See* testimony of Jill Berry First Deputy Commissioner of HRA, at the Oversight Hearing on Timeliness of Public Benefits Processing at the Human Resources Administration before the General Welfare Committee of the New York City Council, Dec. 15, 2022, available at <https://legistar.council.nyc.gov/Calendar.aspx>. Although HRA has announced that it is replacing the Infoline system, it has not yet done so. New Yorkers must be able to contact HRA by phone now – to access benefits, avoid in-person visits to crowded HRA centers, and reduce the spread of the virus.

- **Reform and audit its systems of verifying documents and provide real-time receipts**  
Many households are denied or cut off because the required documents they submit to HRA are lost or ignored and HRA fails to check its own records. HRA acknowledges that the agency is failing to timely index documents and that it does not provide receipts to those who submit documents at centers. HRA should be required to a) retrain staff to only require document submission after HRA has confirmed that it lacks the documents in its systems and that the document is indeed required; b) provide receipts for documents at the time they are submitted; and c) eliminate all backlogs in indexing documents; and d) audit its systems and report on processing delays in indexing documents -- in addition to posting application and recertification delays, the agency should be required to post each month the number of days the agency is behind in indexing documents.
- **Seek waivers to speed processing and post the waivers requested and granted on HRA's website:** HRA should seek waivers of federal and state rules for Cash Assistance and SNAP benefits to speed processing of applications and recertifications. Such waivers requested should include at a minimum, waiving the interview requirement wherever possible and extending certification periods. HRA should be required to post on its website all waivers requested along with responses to those waivers.

## **Part II:**

### **Delays in Processing FHEPS and City FHEPS**

#### **A. FHEPS and CityFHEPS: Ensure that households can apply for and maintain FHEPS housing subsidies and City FHEPS housing subsidies.**

HRA should be required to ensure that households can apply for and maintain FHEPS housing subsidies and City FHEPS housing subsidies. Specifically, HRA should be required to:

1. Reform HRA policies to ensure families can apply for FHEPS and maintain FHEPS and to inform households how to get FHEPS restored if it is mistakenly removed from a case.
2. Conduct refresher trainings on FHEPS and One Shots so that households are not mistakenly told to go to HomeBase to access FHEPS.
3. Ensure accountability: HRA should give receipts when FHEPS applications are submitted by advocates to an HRA mailbox.
4. Report on staffing levels at FCDCU and address staffing shortages to eliminate application and processing backlogs -especially as housing court cases increase each month.

**B. HRA should be required to address backlogs and processing for FHEPS and CityFHEPS.**

HomeBase are the non-profits responsible for administering CityFHEPS subsidies -- but they have huge backlogs – some have 6 month waiting lists to get an intake appointment. As a result, households who have found apartments cannot get through to process the apartments. Households who have court cases cannot get through to schedule an intake appointment to get CityFHEPS or FHEPS to move. Households who need health and safety moves cannot get appointments for dangerous conditions in their apartments. HRA should be required to:

1. Report on processing backlogs and delays with City FHEPS and FHEPS.
2. Report on HRA staffing levels and staffing levels and wages at HomeBase providers.
3. Develop and implement a detailed corrective action plan to reduce backlogs – including addressing staffing levels and wages and having HRA take over work until the backlogs are resolved.

**Part III:**

**Int. No. 703, Int. No. 704, and Int. No. 614**

We appreciate the fact that the bills considered by the Council at the Oversight hearing on December 15, 2022, focus on solutions to some of these systemic issues we have outlined above.

**Int. No. 704**

We support Int. No. 704 which requires HRA to provide the option of electronic payments to landlords – it makes sense to provide payment methods that are accessible to landlords.

**Int. No. 703**

We support timely processing of benefit payments by HRA. Thus, we support the goal of Int. No. 703 which would require reporting of payments made after the “schedule payment date” for rental assistance provided by HRA. As outlined above in our testimony, we also urge the council to address delays incurred by our clients at the front end: they face delays in getting HRA to timely act upon applications for rental assistance such as One-Shot Deals, applications for FHEPS timely processed and they face delays with City FHEPS applications taken and timely processed

**Int. No. 641**

We support the goal of Int. No. 641 to improve service at HRA centers. We agree that it is critical to ensure that each person seeking services should be able to promptly check-in with a staffer and explain their needs. We also feel strongly that they be served in a manner that treats them holistically so that all their needs are met. We agree that individuals who seek services at centers should be able to learn approximately how long it will take for them to receive the services they seek, and they should be able to get information in real time while they are at the centers in visual and audio form. In addition, as outlined above in our testimony, we urge the Council to address current delays that our clients face when they apply for benefits and recertify for benefits. As we outline above, HRA operations are now premised on households using its online system – ACCESS HRA and its dysfunctional phone system - Infoline, to apply and recertify for benefits and to get information about their cases. Thus, it is critical that the Council address the barriers posed by ACCESS HRA and Infoline and the lack of realistic alternatives to these systems that are preventing thousands of eligible New Yorkers access the benefits to which they are entitled.

**Conclusion**

We thank the Council for the opportunity to provide written testimony. We look forward to further collaboration to ensure that HRA eliminates backlogs and processing delays so that all New Yorkers are able to access the SNAP, Cash Assistance and Rental Arrears benefits to which they are lawfully entitled.

Respectfully Submitted,

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### **About The Legal Aid Society**

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

The Legal Aid Society has performed this role in City, State, and federal courts since 1876. It does so by capitalizing on the diverse expertise, experience, and capabilities of more than 2,000 attorneys, social workers, paralegals, and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in 26 locations in New York City, LAS provides comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel.

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



**TESTIMONY OF THE NEIGHBORHOOD DEFENDER SERVICE**

**before the**

**Committee on General Welfare**

**IN RELATION TO**

**Timeliness of Public Benefits Processing at the Human Resources Administration**

**by**

**Marco Balestri**

**Legal Advocate, Civil Defense Practice**

**Jack Boyle**

**Staff Attorney, Civil Defense Practice**

**December 15, 2022**

## **Introduction:**

I am Marco Balestri, Legal Advocate at the Civil Defense Practice at Neighborhood Defender Service of Harlem (NDS). NDS is a community-based public defender office that provides high-quality legal services to residents of Northern Manhattan, including representation in Housing Court through the Right to Counsel Program. In Housing Court cases, our advocacy includes assistance with public benefits and voucher applications including CityFHEPS and FHEPS which can be a lifeline for clients at risk of eviction and homelessness.

However, since the pandemic, our office has experienced significant delays and unresponsiveness in the processing of applications through HRA and its agencies including the HomeBase providers where clients must go to apply for housing vouchers and receive other housing related services. In our experience, Housing Court judges are not willing to wait for resolutions of these applications for rental assistance and housing subsidies and have allowed evictions to go forward, rendering people homeless amid an ongoing shelter crisis.

### *Issues with Timeliness of Applications at HRA Benefits Access Centers*

As reported by several news outlets, retention has been a major issue at HRA, resulting in staffing shortages in departments throughout the agency.<sup>1</sup> This week, City Limits reported that the rate of timely processing of food stamps applications has decreased from 92 percent to just over 60 percent in the past year.<sup>2</sup> In order to begin applications for food stamps, Cash Assistance, and emergency assistance, also known as One Shot Deals, applicants rely on HRA Benefits Access Centers that are severely understaffed and underfunded. This underfunding has made it nearly impossible for advocates or our clients to access HRA staff for information on the status of cases and has resulted in lengthy wait times at HRA Centers, creating significant barriers for our clients to apply for and receive assistance.

One area where we see this impact most acutely is with the initial interview process – a requirement to be approved for public assistance. HRA does not schedule the interviews for Cash Assistance and One Shot Deals, but rather requires an applicant to answer a phone call that comes from an unknown number at any given hour; in-person interviews are not available.<sup>3</sup> Although HRA is required to call within seven days of submitting an application<sup>4</sup>, we have rarely observed HRA comply with this timeline and in fact have experienced cases where clients receive calls up to four weeks from the date of their applications. In some instances, clients have received calls late on the weekends. In our experience, cases are closed after two missed calls, requiring the process to start all over again.

Our team has received several One Shot Deal rejections because of a failure to complete the interview, with clients reporting that they never received the phone calls in the first place. In one case, an elderly Spanish-speaking client was rejected twice for a One Shot Deal because of a failure to complete the interview, even though she never received any phone calls from HRA. Discouraged, our client was ready to give up after more than four months of waiting. It was only after a third application with extensive advocacy that our client was finally approved for emergency rental assistance and able to remain in her rent stabilized apartment of 38 years. Reapplying for a One Shot Deal can delay receiving assistance by more than a month.

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<sup>1</sup> [Major Staffing Shortage Affecting City Housing \(thenyh.org\)](https://thenyh.org/2020/07/20/major-staffing-shortage-affecting-city-housing/). [City Staffing Shortages Lead to Months-Long Waits for Housing Help \(ny1.com\)](https://ny1.com/story/news/local/2020/07/20/city-staffing-shortages-lead-to-months-long-waits-for-housing-help/1015877001/).

<sup>2</sup> [40% of NYC Food Stamp Applicants Left Waiting for Benefits, Data Shows \(citylimits.org\)](https://citylimits.org/2020/07/20/40-of-nyc-food-stamp-applicants-left-waiting-for-benefits-data-shows/).

<sup>3</sup> [ACCESS HRA Frequently Asked Questions \(nyc.gov\)](https://nyc.gov/html/hra/html/faq/faq.html).

<sup>4</sup> [Cash Assistance Interview Instructions \(nyc.gov\)](https://nyc.gov/html/hra/html/faq/faq.html)

These delays have also held up applications for rent vouchers such as State FHEPS and CityFHEPS. For instance, HRA requires applicants to be approved for Cash Assistance before a FHEPS application can be processed and there is no system to request expedition of these applications. These delays have been tremendously detrimental to our clients who are facing eviction in Housing Court.

#### *Disability Accommodations are Not Accessible to Applicants*

HRA's significant delays create an even more challenging hurdle for our clients with disabilities. HRA's solution for cases where clients require disability accommodations, such as requesting a home visit to complete an interview, is to submit a Reasonable Accommodation Request (RAR) over email, phone, or at the client's HRA center. However, we have found that these requests often take several weeks to months to be granted. In one case, a disabled client with severe respiratory issues and who lives in a fifth-floor walkup missed her SNAP recertification. The client did not have a working cell phone and could not physically travel to the HRA center. Our team submitted countless accommodation requests to schedule a home visit to complete recertification, but our emails and phone calls were never answered. The client then lost her SNAP benefits and faced significant food insecurity for an entire month. We were only able to reinstate our client's benefits after extensive, months-long advocacy.

Even with tremendous advocacy from an entire team of attorneys, social workers and advocates, clients often deal with lengthy delays and unresponsiveness. For New Yorkers without legal representation, the hurdles to receiving lifesaving benefits can seem insurmountable. There must be more accountability for the countless delays that cause harm and undue stress to vulnerable New Yorkers. We ask that the Committee propose changes to the public benefits application processes to allow for more accountability and responsiveness, including allowing clients and advocates to schedule interviews for Cash Assistance and One Shot Deal applications and to expedite disability accommodation requests.

#### *The HomeBase Program Administered by HRA to Prevent Homelessness is Not Functioning*

These inefficiencies are not limited to HRA centers; the challenges in accessing benefits delegated by HRA to providers in its HomeBase system are even greater. HomeBase is the exclusive processor for the CityFHEPS voucher, as well as other crucial forms of rental assistance designed to prevent homelessness. Unlike HRA centers, the HomeBase program is run by non-governmental entities who are not subject to the same type of oversight and required response times as HRA. Like HRA, we also understand from conversations with other providers and Homebase workers that many locations are severely understaffed and lack resources. In Manhattan, the problem is particularly acute because just one provider services the entire Borough. This understaffing, combined with numerous systemic inefficiencies and little oversight has created an insurmountable barrier for our clients seeking CityFHEPS and, in one instance, directly caused our client to become homeless.

The challenges begin with even accessing HomeBase services in the first instance. When clients have attempted to visit HomeBase's center in Manhattan in person, they are not admitted. Staff slide a sheet of paper under the door with instructions to email them. We have been told that when clients attempt to call or email to make appointments, no one responds. In our experience there is no plan in place to serve clients who do not have access to a phone or email. When our office makes a referral, it typically takes somewhere between six weeks to four months for HomeBase to even respond to an initial referral and conduct a 'pre-screen' to determine eligibility for HomeBase services, i.e., to speak to a caseworker. At this stage HomeBase will not determine whether a client is actually eligible for a service that HomeBase can provide, such as a housing voucher or rental assistance. We are then told that clients must wait another 8-10 weeks to be seen by a caseworker to conduct intake. Clients then wait again for weeks to months to be processed for a voucher or other assistance.

All told, the process to receive any kind of assistance from HomeBase can take between six months to a year – time our clients do not have in a pending eviction case. Landlords and judges are simply not willing to wait six months or more for HomeBase to conduct a pre-screening interview, complete an additional intake and issue a voucher. HomeBase will at times not even advise as to where a client is in the multi-step intake process, leaving us with nothing to bring to the attention of landlords or the court.

We have clients who have already been evicted because of these delays and mistakes or who are at serious risk of eviction right now while they wait to be seen by HomeBase. Just the delays themselves cause harm as clients can accrue substantial arrears while waiting for assistance. One of our clients chose to be evicted because they believed that they would receive a voucher more quickly at a shelter than through HomeBase. The issues in getting a voucher also extend to the process of leasing an apartment once a voucher has been secured. Sometimes, HomeBase will close a case immediately after issuing a voucher, forcing the client to start back at square one when they are ready to lease an apartment or need to make a change to their voucher. Errors with the calculation of utility payments, the timing of rent checks, and other mistakes can lead to voucher holders being denied eligible housing.

As documented by the Daily News in April 2022, 76% of people who received a CityFHEPS voucher, and who were approved for an apartment by a landlord, were nonetheless blocked from renting the apartment by HRA/DSS often for reasons like spelling out on an application “street” as opposed to “st.” for the address to the apartment.<sup>5</sup>

While we applaud the recent announcement from the City expanding the eligibility criteria for CityFHEPS, without a concerted effort to improve the procedures for issuing and processing these vouchers through HomeBase, the system is likely to come under further strain.

In all, the HomeBase system is at a breaking point. Tenants are not able to obtain emergency assistance which they may be eligible for. Legal services providers are not able to obtain the answers we need to prevent evictions. Every day these issues are causing serious harm to the most vulnerable members of our community. We urge the Committee to conduct a thorough review of the policies and procedures that govern Homebase to ensure the effective administration of these crucial benefits.

*Int 0641-2022, Int 0703-2022, and Int 0704-2022 Would Provide Much Needed Accountability and Efficiency in HRA Processes*

NDS strongly supports all three bills on the agenda for today’s session. In particular, the disclosure requirements regarding the timeliness of city-funded rental payments proposed by Int 0703-2022 and the introduction of an electronic transfer option for rental payments would provide much needed modernization to the city’s rental assistance payment system. Our office routinely handles cases where tenants are being sued for eviction as a result of errors in processing or mailing rent checks to landlords. Through no fault of their own, our clients are being put at risk of losing their homes due to these kinds of preventable errors and we support these efforts to avoid them.

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<sup>5</sup> [NYC bureaucracy kept homeless out of thousands of vacant apartments \(nydailynews.com\)](https://www.nydailynews.com/homeless-out-of-thousands-of-vacant-apartments/); [Administrative Obstacles Jam Up Moving Process for NYC Shelter Residents \(citylimits.org\)](https://www.citylimits.org/administrative-obstacles-jam-up-moving-process-for-nyc-shelter-residents/)

Testimony by the New York Legal Assistance Group,

Oversight – Timeliness of Public Benefits Processing at the Human Resources

Administration, and in Support of

Int. 0641-2022 and Int. 0703-2022

Before the New York City Council Committee on General Welfare

December 15, 2022

Deputy Speaker Ayala, Council Members, and staff, thank you for the opportunity to speak to the Committee on General Welfare on the timeliness of public benefits processing at the Human Resources Administration, and legislation impacting public benefits applicants and recipients. My name is Abby Biberman, and I am the Associate Director of the Public Benefits Unit at the New York Legal Assistance Group (“NYLAG”).

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's Public Assistance and SNAP Practice represents clients having trouble accessing or maintaining these benefits. We represent our clients at Administrative Fair Hearings and conduct advocacy with the Department of Social Services ("DSS"), Benefits Access and SNAP centers, and bring impact litigation to ensure that our clients are obtaining and maintaining an adequate level of benefits. Our Shelter Advocacy Initiative provides legal services and advocacy to low-income people in and trying to access the shelter system. We assist and advocate for clients who are already in shelter as they navigate the system and work towards exiting shelter and establishing and maintaining permanent housing.

I have worked with individuals and families who are attempting to apply or recertify for public assistance and SNAP benefits, in addition to families facing eviction who applied for or receive rental assistance administered by HRA. In conjunction with our Tenants' Rights Unit, we ensure that our clients obtain the benefits needed to pay arrears and stop their evictions. I appreciate the opportunity to offer the following comments.

1. Oversight

First, HRA is persistently delaying processing applications and recertifications for SNAP and Cash Assistance benefits, and our clients are left without benefits to feed and care for their families. Second, HRA is failing to

maintain functional systems both online and in person that enable SNAP and Cash applicants and recipients to obtain and maintain benefits.

There are three major problems related to processing of applications and recertifications: (1) failure to process the actual recertification and application forms; (2) failure to conduct the interviews; and (3) failure to index documents that clients submit to support their recertifications and applications for benefits.

First, HRA is failing to process the multi-page recertifications and applications that clients complete, sign, and submit, either online, by fax, mail, or in person. HRA testified about unprecedented need. HRA has a duty to these New Yorkers in need, and there are laws and regulations it must follow in serving clients. We have had an unprecedented number of clients over the past several months who have submitted their SNAP recertifications on time only to find out the following month that HRA has failed to process the paperwork and discontinued their benefits, often without notice. These clients must challenge the action at a Fair Hearing to have the discontinuance reversed, or they must reapply for benefits. Even if they request a Fair Hearing immediately, they have no right to aid continuing under the regulations, which would have allowed them to receive benefits while their hearing is pending, so they are without money to buy food. New benefits applicants and those reapplying for benefits (who are treated as new) are also experiencing delays. They complete their applications and do not receive a determination or

benefits to which they are eligible by the 30<sup>th</sup> day, as required by state law and regulations. They are simply left waiting for benefits they desperately need.

The delays we are seeing include emergency assistance applications for rent arrears (“One Shot Deals”). Clients report to us that they submit applications, usually online and never receive a decision from HRA. When NYLAG intervenes, we are often told that the application was never received by HRA’s Homelessness Diversion Unit, the department that processes emergency assistance applications. HRA is not transparent with advocates about where the breakdown occurs, and we are usually told that our clients must reapply, even when we have proof that they already submitted a complete application.

The delay in processing an application for cash assistance benefits also impedes their ability to apply for rental assistance programs to help pay arrears and ongoing rent. For both emergency assistance and rent subsidy cases, with the clock running in housing court, our clients are at serious risk of eviction when HRA delays in processing a recertification or new application.

Second, clients are unable to connect with caseworkers to complete the required phone interview. For Cash Assistance, HRA is supposed to call the client to complete the interview. Clients are not given a scheduled interview time and if circumstances lead them to miss the call, it is often impossible for them to connect with a caseworker again to complete the interview. The agency codes this as an

incomplete application or recertification and rejects the case. This contributes to administrative churn, causing some clients to temporarily lose benefits or to submit multiple reapplications before they are accepted. Meanwhile, as with the delay, these clients who are forced to reapply are missing deadlines to pay in housing court, losing out on rental supplement programs for which they are eligible, and at serious risk of eviction.

Finally, HRA routinely fails to index documents that are submitted online and via other methods, such a fax or in person. As a result, our clients are improperly denied benefits for failure to submit documents, or they are accepted for benefits at a much lower level than they should be based on their household income and expenses. For example, a client may be accepted for SNAP benefits due to their income, but a SNAP budget deducts expenses that they can document, such as rent. If the agency fails to index the documents they submit, it can result in the difference between a monthly SNAP benefit of \$20 or \$281 for an individual. For Cash Assistance recipients, most of the documentation is required to get approved for benefits, so the case will get rejected, and the client will need to request a hearing or reapply for benefits, or both.

2. Int. 0641-2022 Would Improve the Client Experience at Benefits Access and SNAP Centers, But HRA Needs to Improve In Person Case Management

Int 0641-2022, which would require all Benefits Access and SNAP centers to have an expediter on site at all times to assist clients with checking-in, would

improve the client experience for those who need in person assistance, but it does not go far enough. The queue management system will help our clients know when they will receive assistance and help them to manage their own time. Many of our clients must take time off from work to visit the center, seek childcare, or are forced to bring their kids with them. Giving them an idea of how long the wait will be an improvement and allow for better planning in light of other obligations.

Our clients rely on Benefits Access and SNAP centers, but they are not being served properly when they get there. In most cases, our clients visit the center because they either do not have access to technology, have not been able to complete the tasks they need to using Access HRA, or they have completed the tasks, but they have not been able to connect with anyone at HRA by telephone to complete the required interview. We know this, because our clients contact us understandably panicked about losing their benefits or needing immediate assistance to apply or reapply. These are clients who really need to speak with a representative when they go in person to a center, but instead they are directed to a kiosk, where they are told to apply or upload documents using the computer. Most of the time, our clients could truly benefit from and resolve their issues by meeting with a HRA caseworker to either have someone explain what they need to do, to physically accept and index their documents, or to help them complete a required interview. Therefore, an on-site expediter would be an improvement, but what they also need is more in-person

case management. This will help to prevent more case closures, reapplications, and reduce fair hearings.

Finally, HRA's reliance on Access HRA and Infoline is causing too many clients to fall through the cracks. Many of NYLAG's most vulnerable clients, including seniors and the homeless, are not able not able to utilize these platforms, and need more comprehensive in-person assistance to apply for and recertify their benefits.

### 3. Int. 0703-2022 Would Improve the Administration of Rental Assistance Programs

NYLAG supports Int. 0703-2022, which would require HRA to submit quarterly reports on whether rental assistance payments are being made on time to landlords. A key component to maintaining stability in permanent housing is reliable rental assistance programs. NYLAG represents clients in housing court and people who are exiting the shelter system with rental assistance programs. Unfortunately, the clients who are even lucky enough to secure ongoing rental assistance frequently encounter problems after the initial payments are made. Our clients who rely on both FHEPS and CityFHEPS vouchers report that DSS often does not pay their rent on time and sometimes will discontinue rental payments without notice to the client or the landlord. We routinely represent clients who are in months of arrears without even knowing that the payments were not being made. Some clients don't learn that they are in arrears until the landlord serves them with a new

petition. NYLAG attorneys and paralegals conduct extensive advocacy with HRA to reinstate these programs and get retroactive payments issued to the landlord, but we are extremely concerned about the benefits recipients who do not have an advocate to help them. These individuals and families will end up back in housing court or in a shelter. Oversight and reporting on rental subsidies are steps in the right direction to improving administration of these programs.

We thank the Committee on General Welfare for the work it has done to facilitate services for vulnerable New Yorkers, and for holding this hearing and taking this opportunity to continue to improve the conditions for our clients. We hope we can continue to be a resource for you going forward.

Respectfully submitted,

New York Legal Assistance Group



**Testimony submitted to the Committee on General Welfare  
Re: CityFHEPS reforms and processing times  
Sara Newman, Director of Organizing**

Thank you for the opportunity to submit written testimony to the Committee on General Welfare as part of its oversight of CityFHEPS processing times and proposed legislation to improve CityFHEPS payment processes. My name is Sara Newman, and I am the Director of Organizing for the Open Hearts Initiative, an organization that builds solidarity between homeless and housed neighbors in communities throughout the city.

A key principle in our work is to listen to and elevate the voices of people directly impacted by homelessness, and one of the challenges we hear about most frequently from neighbors with CityFHEPS vouchers is that the process is riddled with obstacles. People face obstacles in getting approved for a voucher, finding an apartment, and securing timely rental assistance payments. All of these challenges contribute to a skyrocketing average length of stay in shelter. During the 2021 fiscal year, the average length of stay in DHS shelters was 483 days, 520 days, and 773 days for single adults, families with children, and adult families, respectively.<sup>1</sup>

A robust housing voucher process must be a central aspect of the City's approach to homelessness, such that those who exercise their right to enter the homeless shelter system can quickly learn about, apply for, receive, view apartments with, and complete the leasing process with a voucher that is as good as cash. CityFHEPS is the pathway to permanent housing for most homeless New Yorkers, but it needs major reforms in order to more effectively and efficiently address the homelessness crisis.

There are several steps the city can take to help people move more easily out of shelters and into permanent housing. These include:

- Immediately eliminating the 90-day rule, which requires an unnecessary waiting period before people can apply for a CityFHEPS voucher, creating bottlenecks in shelters

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<sup>1</sup> Jacquelyn Simone, "State of the Homeless 2022: New York at a Crossroads," Coalition for the Homeless, March 2022, 31, <https://www.coalitionforthehomeless.org/wp-content/uploads/2022/03/StateofThe-Homeless2022.pdf>.



- Fully funding and staffing the City Commission on Human Rights (CCHR) to enforce protections against source-of-income discrimination
- Expanding eligibility for CityFHEPS to individuals who are undocumented
- Eliminating the utility allowance deduction

Furthermore, in the existing system, even *after* individuals have received their vouchers, found a suitable unit within the program's budget requirements, and signed a lease, payments from the City to their landlord are often late, which puts them at risk of eviction and another bout of homelessness.

We support [Introduction 703](#), which would require additional reporting on the timeliness of CityFHEPS and other rental assistance payments. We frequently hear from neighbors with CityFHEPS vouchers whose housing stability has been jeopardized by untimely payments from the city. The city's reputation for delayed payments has also contributed to many landlords' reluctance to rent to voucher holders (a practice which violates City law against source-of-income discrimination).

We also support [Introduction 704](#), which would make it easier for landlords who are interested in the option to receive CityFHEPS voucher payments via electronic bank transfers. This would simplify the process for releasing payments by making funds more quickly accessible and reducing the likelihood of errors. We know that these errors are unfortunately quite common: in 2021, for example, one individual we know received a 30-day eviction notice after the city had been mailing his rental assistance payments to the [incorrect address](#).

These are common-sense policies that everyone should be able to get behind. Making vouchers work better is the right thing to do, makes fiscal sense—housing a New Yorker with a CityFHEPS voucher is less expensive than providing space in the DHS shelter system—and is long overdue for our neighbors who have been languishing in shelters for years.

Re: Oversight - Timeliness of Public Benefits Processing at the Human Resources  
Administration

New York City Council  
Committee on General Welfare  
Chair, Hon. Diana Ayala  
Thursday, December 15th, 2022

My name is Amrah Rizvi and I am writing about my experience with HRA and the Fheps program.

This program is for needy people, poor people, domestic violence survivors. We are already disheartened and HRA makes it more disheartening.

The first time you're approved for Fheps and trying to locate an apartment, it's really hard. Many landlords don't take Fheps or CityFheps vouchers, even though it is illegal for them to refuse us. They will also tell us that the apartments are too expensive for our vouchers.

It is really hard to deal with HRA. If someone has to transfer because it's unsafe, the apartment is too small, the apartment has pests, or landlords are bothering us, HRA takes a long time.

We are already disheartened because of family violence and matters in the family. Sometimes neighbors or other community members disturb us. So we are dealing with a lot and then to take Fheps or CityPheps programs and dealing with HRA is really tough. It takes a long time. Also HomeBase will also take a long time and they will take appointments after 2-3 months and then we have to wait. Sometimes they don't follow up with us and the workers don't do the work.

There are many vacant Fheps and CityFheps apartments and the city needs to listen to domestic violence survivors and let us live in peace where we choose. HRA and HomeBase slow down what is already a heartbreaking process. Please improve this.

Sincerely,  
Amrah Rizvi

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**Testimony of Jimmy Meagher  
Policy Director, Safe Horizon**

**Committee on General Welfare  
Hon. Diana Ayala, Chair**

**Safe Horizon's Testimony on the Timeliness of Public Benefits  
Processing at HRA and HRA's Impact on Survivors and RHY**

**12.15.2022**

Good morning and thank you for the opportunity to provide testimony before the Committee on General Welfare. My name is Jimmy Meagher, my pronouns are he/him/his, and I am Policy Director at Safe Horizon, the nation's largest non-profit victim services organization. Safe Horizon offers client-centered, trauma-informed help to 250,000 New Yorkers each year who have experienced violence or abuse. We are increasingly applying a lens of racial equity and racial justice to guide our work with clients, with each other, and in developing the public positions we hold.

In 2022 Safe Horizon completed a listening tour of clients and advocates throughout our agency. We found the top two priorities for survivors are permanent housing and financial stability. Economic stability and independence are foundational to safety. So many survivors don't have the choice to leave their abusive partner, even if they want to, due to economic reasons rooted in systemic sexism and racism. During this pandemic, undocumented survivors, runaway and homeless youth (RHY), and Black and brown survivors lost what little they had – employment, housing, childcare, etc. Unfortunately, our city's response to the needs of survivors and RHY has been inadequate, and the systems designed to help our most vulnerable neighbors haven't always done so. Our government should be providing compassionate and timely care, but ultimately our clients experience significant delays, bureaucratic hurdles, and impossible barriers to housing and financial well-being.

In my testimony today, I will focus on the feedback from two Safe Horizon programs with vast experience navigating the Human Resources Administration (HRA): our Domestic Violence Shelter Program and our Streetwork Project, which works with runaway and homeless youth (RHY). I will also speak to the three bills on today's agenda, which Safe Horizon supports.

These are some of the issues our Domestic Violence Shelter team has experienced, specifically regarding vouchers administered by HRA:

- HRA takes too long to issue housing vouchers, to update vouchers, and to process housing packets. It is taking 2-3 months to process housing packets, and most landlords cannot or will not hold vacant apartments for that long. Also, we then have to ask landlords or brokers to update the paperwork because everything has expired by the time HRA finalizes the packet. These delays are preventing survivors from leaving shelter, which is intended to be temporary, and into their own homes.
- A survivor's time in domestic violence shelter is limited under state law. Because landlords/brokers will not entertain clients who do not have a shopping letter in hand, delays mean survivors are losing precious time looking for an apartment.
- If clients are found ineligible for a shopping letter or voucher, we have no way of confirming whether the client has been found ineligible or if HRA is just late with issuing the voucher. We are advocating for HRA to be transparent with information and send timely notifications to clients that confirm if they are ineligible and why.
- Once a survivor does find an apartment, the HRA housing inspection takes too long, so again landlords choose to walk away.

- HRA does not always respond to emails in a timely manner; if and when they do respond, they do not always address the concerns raised by advocates and survivors.
- HRA's job centers do not update their system so client information is not always accurate or updated.
- Ultimately, some landlords choose not to engage with HRA due to these delays and bureaucratic headaches. Because HRA does not pay rent on time, landlords do not want to accept vouchers administered by HRA. Some clients go nearly a year without HRA paying a single month's rent. Our experience with landlords is not necessarily source of income discrimination, but not wanting to deal with HRA. Survivors are losing out on apartments.
- There is no working &/or responsive number for clients to contact for rental support once they leave shelter. And there is also no number for landlords to call to answer their questions about navigating HRA and delayed payments.
- Additionally, clients across our programs have expressed feeling disrespected when they go in person to HRA job centers. This is especially alarming because our clients have experienced trauma and are seeking help and safety. This is beyond a customer service issue; survivors deserve compassionate and trauma-informed care.
- We have also experienced many issues with HRA's various systems:
  - The CurRent system was created to make the housing application process easier, but the system is plagued by glitches and issues. Safe Horizon participated in the pilot of this system, and our staff compiled a list of issues that remained unaddressed before the official launch. Staff are still experiencing issues and sometimes must go back and forth with HRA's DV Housing Unit about entering packets manually. Some barriers include:
    - Some housing specialists are unsuccessful when trying to use CurRent. If a housing specialist can upload the packet, HRA does not always check the site regularly and our housing specialists do not know if or when HRA has received the packet.
    - Often HRA does not see the packet once it is submitted, so the packet gets lost or stuck. When this happens, staff are unable to see if the packet has been viewed.
    - Often once a packet is submitted, it isn't visible for supervisors to sign off.
    - If a parent and child have the same name, the system can become confused and the packet is thrown out.
  - HRA requests that we monitor clients' PA cases in NYCWAY to ensure cases remain active. However, their IST department takes at least a month or more to issue NYCWAY accounts or SORTS accounts. These delays prevent staff from doing their other day-to-day work.
  - We recommend that HRA use the CAPS system, which works well, instead of CurRent.

- Ultimately, some survivors are choosing to return to their abusive partners as a result of how impossible it is to find, secure, and maintain housing.

We have heard that the delays listed above may be caused or exacerbated by limited staffing at HRA. We are sympathetic to this, as the human services nonprofit sector is also experiencing staffing shortages. If that is the case, the Administration should prioritize investments in HRA staff, rather than cut positions, and eliminate barriers to hiring, including allowing for remote work and/or hybrid models. The Administration should be eliminating bureaucratic barriers rather than creating new ones that only compound the many crises our clients are facing.

These are some of the issues our Streetwork Project team has experienced:

- We have many issues with the interview process required to access benefits. Currently, clients can apply remotely for benefits via AccessHRA but must wait for a phone call from an HRA worker to complete a mandatory phone interview before their application is complete. More often than not, this call never comes. Some of our clients do not have reliable phone access. And sometimes HRA says they called but nobody picked up (which we cannot verify). Clients cannot schedule when this call will be. Theoretically, there is a phone number that can be called during business hours for an “on-demand” phone interview, but more often than not, nobody answers that phone. Even going in person to the job centers (which clients often want to avoid) does not actually guarantee that you will be seen and be able to complete the interview. If the interview is not completed, the application is not complete and not processed. Our staff spend a ridiculous amount of time trying to facilitate these interviews and help clients navigate these barriers. Clients are picking up unknown numbers hoping that it is HRA, and it’s not. This is alarming because our clients have experienced trauma and violence. Answering unknown numbers can be stressful, scary, and dangerous. Applications drag out for months and clients are unable to access benefits that they are eligible for.

It would be extremely helpful if HRA allowed folks to schedule the day and time of the interview. Additionally, HRA should adequately staff the on-demand interview phone number so that it actually works to provide an on-demand interview.

- Clients must repeatedly resubmit documents that HRA already has copies of into AccessHRA. If anyone (including a parent) has ever submitted a document to HRA, HRA has an electronic copy of it. When clients apply for benefits, however, their application is not complete until they upload the same documents that HRA already has. When clients don’t have these documents, their application is not fully submitted and is rejected. Our staff can log into the HRA PACT system and obtain copies of the documents that HRA has on file. There are times when a client does not have a copy of a document, for example a birth certificate, so they cannot complete their application. Staff must log into HRA PACT, get a copy of the birth certificate that HRA already has on file, and then upload a copy of that same document to HRA in order for the application to be completed and processed. This is obviously a ridiculous and arbitrary barrier for clients to be able to access benefits.

Clients cannot access these documents from the HRA PACT system themselves, so for many New Yorkers, this barrier is both insurmountable and completely unnecessary.

- Lastly, Streetwork is a proud member of the New York Coalition for Homeless Youth (CHY), and we echo the testimony CHY is providing during this hearing about how the Administration is interpreting a law that was intended to allow RHY to access CityFHEPS without having to go to DHS shelter, which is an unsafe system for many of our RHY clients.

In our experience, the city prioritizes unhoused New Yorkers residing in the DHS shelter system over survivors in the HRA domestic violence shelter system and RHY in the DYCD shelter system. We are asking the Administration to put an immediate end to this siloed system and stop pitting unhoused people against one another. The city must ensure that paths to housing are equitably distributed to all unhoused New Yorkers, regardless of which door you walked through for help.

Safe Horizon supports the intent of the three bills on today's agenda.

- Int 0641-2022 would require all job centers and SNAP centers to have an expediter on site at all times in which clients are being served or waiting to be served. Expediters would check-in clients, perform a preliminary review of clients' documents to ensure clients have all necessary documents, and direct clients to the appropriate line or waiting area. This bill would also require all such centers to be equipped with digital displays and an audio amplifier and implement a queue management system. The system will inform clients how many people are ahead of them in the queue and the approximate time that they may expect to be called to begin an appointment for each service.

When we advocate for processes to be trauma-informed, we are often advocating for systems to be transparent and to let survivors know what to expect and when. This bill would be a step in the right direction because our clients will better know what to expect when going into a job center or SNAP center.

- Int 0703-2022 would require HRA to submit quarterly reports on whether rental assistance payments for programs established by HRA are sent on time to landlords on behalf of tenants receiving assistance.

As I discussed earlier, HRA is not paying landlords on time. Survivors, RHY, and other unhoused New Yorkers deserve accountability from the systems created to serve and help them. This bill will help to ensure accountability.

- Int 0704-2022 would require the Human Resources Administration to provide landlords the option to accept rental assistance payments via an electronic transfer into a bank account.

Any process that expedites payment to landlords is welcomed. However, this bill will only help if HRA actually pays landlords on time.

Advocates and unhoused New Yorkers have successfully and collectively advocated for an increase in CityFHEPS voucher amounts to FMR, for an increase in state FHEPS amounts to FMR, for expanded access to CityFHEPS for RHY, and for other important and critical policy changes for survivors, for RHY, and for other unhoused New Yorkers. And yet we are here today because our clients, our neighbors remain unhoused.

Our city government must take accountability for our homelessness and housing crisis. City agencies that are designed to help New Yorkers in need are too often falling short in providing the critical assistance they need. All homeless New Yorkers deserve a path to safety and stability, and we look forward to working with the Council and the Administration to help broaden these paths. Survivors deserve better. RHY deserve better. New Yorkers deserve better.

Thank you.

**RE: Status of WTC Disability Claim & Final Election Option Letter to Finalize Retirement for Louis Callegari - Pension # ##### / Membership # #####**

I, Louis Callegari had to stop working on June 25, 2021 (**over 16 months ago**), with the New York City Housing Authority "NYCHA" after 31+ years of service and file a WTC Retirement Disability claim with the New York City Employees Retirement System "NYCERS" in October 2021 (**over 14 months ago**). I served as a 911 responder for NYCHA and worked at Ground Zero immediately following the terrorist attacks to which I worked several months at Ground Zero and developed very serious Physical and Mental health issues due to the clean-up and recovery efforts.

As part of my WTC Retirement Disability Claim I had to submit numerous medical documentations from my own Doctors as well as medical documentation from the WTC Health Program to the NYCERS Medical Unit Board. I also had a virtual meeting with the NYCERS Medical Board Panel of Doctors in March/April of 2022, and as of today I still **have not received** a determination from the NYCERS Medical Unit on my WTC Disability Claim and I still **have not received** the Final Option Election Letter from NYCERS to finalize my monthly retirement payments and beneficiary options.

It is now over **12 months** and the NYCERS Medical Board still has not yet made a determination on my WTC Disability Claim and NYCERS still has not finalized my retirement to which I still have not received my Final Option Election Letter.

Please be advised, I was informed by NYCERS customer service representatives on numerous occasions that these processes would take **6-8 months** to make a determination on my WTC Disability Claim and to send me a final election option letter to finalize my retirement. It is now over 12 months and NYCERS still has not completed these reviews.

I'm a disabled person and continue to receive reduced monthly pension payments (for the last 12 months) because these issues still have not been resolved by NYCERS.

Any assistance on this critical matter would be greatly appreciated.

Thank you,

Louis Callegari  
My Pension # is ##### & Membership # is #####  
Email: stormvet99@aol.com

## **City Council General Welfare Committee Hearing**

December 15th, 2022

Testimony of Ethel Brown, Neighbors Together leader,  
in support of Intros 703 and 704.

Thank you Chair and Council members for the opportunity to testify today.

My name is Ethel Brown. I'm a mother, a grandmother, a CityFHEPS voucher holder, and a leader at Neighbors Together. I'm here to express my support for Intros 703 and 704.

I have firsthand experience with HRA not paying my rent on time. My family and I just moved into our apartment with our CityFHEPS voucher in late August of this year after more than seven years of searching for a place of our own with our voucher and months of delays in the move-in process.

This month my landlord asked us if the voucher money would come to him on time and we told him yes, because that's what we expected. Now, our yes became a no because HRA did not send the funds in time for our December rent payment. This is hurting our credibility with our landlord and creating a mistrust of us and the voucher program, and for us it's just another experience of the voucher not working the way it should.

My daughter reached out to HRA for assistance to try to figure out what happened with the rent, and was told to call Homebase. Homebase told her that they couldn't help her and that she wouldn't be able to get an appointment until June. So we're left on our own, trying to figure it out before our landlord gives us a 30 day notice.

Passing Intro 704 will make a big difference on behalf of voucher holders like myself, and to the landlords because they'll be getting their money on time.

If my family and I knew that checks were being deposited automatically and on time, it would make us feel more secure.

More landlords would accept vouchers because it would be like getting your paycheck automatically because it's right there- you don't have to wait for it.

Timely electronic payments would improve landlords' impression of vouchers and working with government agencies because it would move the system from something archaic to something modern and up-to-date.

I strongly urge the council to pass these two bills to help keep voucher holders housed and out of homelessness.

Thank you for your time and attention.

**City Council General Welfare Committee Hearing**  
December 15th, 2022  
Testimony of Tiffany Lynes, Neighbors Together leader,  
in support of Intros 703 and 704

Thank you Chair and Council members for the opportunity to submit testimony.

My name is Tiffany Lynes. I'm a mother, an educator, a CityFHEPS voucher holder, and a leader at Neighbors Together. I am submitting testimony in support for Intros 703 and 704.

I moved into my apartment in April of 2019 after 4 years of homelessness and searching for an apartment with my CityFHEPS voucher. Having a stable place to live has always been what seems like an almost unattainable dream due to the high prices for apartments in New York. Receiving the voucher is one of the only reasons my family was able to afford to continue to live in New York and find housing.

Unfortunately, during COVID we all saw significant delays in service delivery and I am still affected by those delays even after two plus years. My apartment building is overseen by a management company, and one day during the height of COVID, I received notice from them that I was 4 months behind on rent. This came as a complete shock to me because I never heard anything about being late on rent prior to that. To just randomly get a certified letter by mail stating that I was 4 months behind on rent was very unnerving. I suffer from very bad anxiety and I started imagining my landlord taking us to court. I started not going outside because I had a fear that I would come home and be locked out of my apartment, unable to get back in, and that me and my family would be homeless again. My fear was made worse when the management company started sending the security guards upstairs to put overdue rent payments notices on my door and began calling my phone two to three times a day and sent certified letters.

I set up a meeting with the management company to figure out what was going on and as soon as I walked in, they informed me that they hadn't received rent payments for about 4 months and they wanted to know if I would be able to pay 4 months of back rent up front. I told them I was incapable of doing that because I wasn't working for the Department of Education because we were in the middle of a pandemic and everything was virtual. I inquired about why they waited until I was 4 months behind before informing me of it, and I was told that it was because they received the rent checks through the United States Postal Service; sometimes the checks were late, sometimes they would get two checks at once- one for the current month and one for the past month because they often arrived late. They told me that's why they bill my account

prior to receiving the checks- because they know the checks tend to come late. At that point, after 4 months of not getting a check, they wanted to alert me that they hadn't gotten payment and if they didn't get payment the following month they would start the process to evict me.

I was in complete and utter shock that the payments were even still coming by check because paper checks frequently get stolen or go missing, and in this day and age of technology, almost everything is automated and electronic. If the system had been more up to date, they could have gotten the payments electronically after the first month, and I would have been made aware that something was going on and possibly been able to fix it.

After over a week of trying to contact the Human Resource Administration I found out that the checks had been sent out via the mail system and that they should have arrived. I started going to the post office in my local area to inquire about mail in general as we hadn't received any mail from the US Postal Service in a while as well. I was told by a postal worker in our local office that due to the lack of postal workers they had a lot of mail for our building that hadn't gone out for over a month at that point. I inquired about picking up my personal mail as well as the rent checks mailed out by the Human Resource Administration to deliver them personally to the management company for my building, but I was told that because it wasn't made out to me I would not be able to pick them up.

Because of this, I had to go back to the management company and inform them that the checks were waiting at the local postal office and that they had to be picked up by somebody from management or they would undoubtedly have to wait until they could find somebody to deliver it. Management was highly upset by this considering that the post office was just a few short blocks away, but at the same time nobody from the management office went to pick them up, and it took another month to have them delivered. I wasn't the only one affected by this- I found out multiple people were also waiting on payments and also received letters from the management company.

It's sad to consider that all of this could have been avoided simply if the system had been updated so that landlords could receive payments electronically. Myself and so many others in my building could have been spared the intense stress and fear of receiving surprise eviction notices. I strongly support Intro 704 and Intro 703, and call on the Council to vote in favor of these bills.

Thank you for your time and attention.

Sincerely,  
Tiffany Lynes

**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: 12/15/2022

(PLEASE PRINT)

Name: Ramon E. Flores

Address: 4WTC 150 Greenwich St 36th Flr

I represent: Human Resources Administration

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: Milton Perlez

Address: New Lots Ave

I represent: LOCAL NY H.V, Bronx, Puerto Rico

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: Jimmy Meacher (pronounced Mar)

Address: 372 Bath St BL NY 11231

I represent: Safe Horizon

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: 12/15/22

(PLEASE PRINT)

Name: NICHOLAS BUSS

Address: 39 B'WAY NY, NY 10006

I represent: FOOD BANK FOR NEW YORK CITY

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: 12/15/22

(PLEASE PRINT)

Name: Kamilah Newton

Address: CROES AVE.

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: Jeyson Frederick

Address: CROES AVE.

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: 12/15/22

(PLEASE PRINT)

Name: Jill Berry

Address: 4WTC

I represent: NYC Dept of Social Svcs

Address: 4WTC

**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 FITZPATRICK

Address: 4 World Trade Center NYC

I represent: NYC HRA

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: Dr. Benjamin Zibit

Address: 23-08 Newtown Ave #4Fu

I represent: - my Council Member is

Address: Tiffany Caban

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. All Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: 12/15/22

(PLEASE PRINT)

Name: Kathleen (Katie) Kelleher

Address: kkelleher@legalaid.org

I represent: Legal Aid Society

Address: 199 Water St 3rd Fl, N.Y. 10038

**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: 12/15/22

(PLEASE PRINT)

Name: Towaki Komatsu

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

I represent: Self

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

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. All Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: 12/15/2022

(PLEASE PRINT)

Name: Marco Balestri ~~ET~~ mbalestri@ndsny.org

Address: 317 Lenox Ave 10th Floor New York, NY 10027

I represent: Neighborhood Defender Service of Harlem

Address: 317 Lenox Ave 10th Floor