

Suzy Goldberg  
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New York City Department of Homeless Services  
150 Greenwich Street, 38th Floor  
New York, New York 10007

Re: Special One-Time Assistance (SOTA) Program Public Comment

To whom it may concern,

Thank you for the opportunity to comment on the Special One-Time Assistance (SOTA) Program. As a Brooklyn resident pursuing a Master's Degree in City and Regional Planning at Pratt Institute, I would like to voice my support in favor of the proposed rule to provide one year of rental assistance to individuals and families transitioning from New York City Department of Homeless Services (DHS) shelters to permanent housing within or outside New York City.

Homelessness in New York City has reached the highest levels since the Great Depression in the 1930s.<sup>1</sup> The Coalition for the Homeless reported that over the course of the City fiscal year 2020, 122,926 different homeless men, women, and children slept in the New York City municipal shelter system, and the number of homeless single adults is 109% higher than it was 10 years ago.<sup>1</sup> These statistics are staggering, yet they don't even encompass the total number of unsheltered homeless individuals sleeping in the subway system, streets, and other public spaces. Additionally, the Coalition for the Homeless cited that 57% of heads of households in shelters are Black, 32% are Hispanic/Latinx, 7% are white, less than 1% are Asian-American or Native American.<sup>1</sup> Thus, homelessness disproportionately affects Black and Hispanic/Latinx New Yorkers. The City has a responsibility to address the current affordable housing crisis that is leading to unprecedented rates of homelessness for New Yorkers.

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<sup>1</sup>*Basic Facts About Homelessness: New York City*. Coalition For The Homeless. (2021, May). <https://www.coalitionforthehomeless.org/basic-facts-about-homelessness-new-york-city/>.

Among the 122,926 different homeless men, women, and children that slept in the New York City municipal shelter system in 2020, over 39,300 were children.<sup>1</sup> This number is vastly underestimated, as more than 100,000 city public school students lack permanent housing.<sup>2</sup> A 2020 New York Times article described the hardships that homeless children face in school, especially since the beginning of the Coronavirus Pandemic. As school has transitioned to remote learning, many students have struggled to access Internet connectivity and devices to communicate with their teachers and classmates. Additionally, children experiencing homelessness often have to switch schools every time their family's shelter placement changes, leading to stressful and disruptive educational experiences. Despite the fact that the Department of Homeless Services claims to take into account the neighborhood in which the family's youngest child attends school in its placement decisions, according to the 2020 Mayor's Management Report, only 50% of city shelter placements in 2019 were in the same borough as the youngest child's home school.<sup>2</sup> This may also contribute to the high rates of absenteeism in students experiencing homelessness, as 43% of the city's homeless students were chronically absent, meaning they have missed 10% or more of the school year.<sup>2</sup> Getting to class every day is a tremendous challenge for children who are sleeping far away from school and living in temporary and stressful conditions. Thus, student-homelessness and the impact it has on their education is an important reason to support SOTA and the creation of permanent housing opportunities.

Furthermore, SOTA is an impactful strategy that has the potential to reduce numerous barriers to accessing permanent housing. One theory that is used to support the mission of SOTA is the Housing First approach. According to the National Alliance to End Homelessness,

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<sup>2</sup> Shapiro, S. M. (2020, September 9). *The Children in the Shadows: New York City's Homeless Students*. The New York Times. <https://www.nytimes.com/interactive/2020/09/09/magazine/homeless-students.html>.

Housing First prioritizes access to permanent housing to people experiencing homelessness, which ultimately serves as a platform for which they can then achieve personal goals.<sup>3</sup> The Housing First model has been found to break cycles of chronic homelessness because obtaining housing stability can alleviate economic and mental stress and lead to success in other areas of life. SOTA participants, who formerly resided in a shelter for the past 90 days, are provided with one year of rent. This is an example of a Housing First model that values the importance of a stable housing status to the overall quality of life for New Yorkers.

Not only is SOTA positive for individuals, but it also reduces health care costs in society. Breaking Ground, a permanent supportive housing developer and advocacy group, states that between emergency care, shelters, and hospital visits, the average individual experiencing homelessness and mental illness costs \$56,350 to the city.<sup>4</sup> Thus, there is also an economic incentive for the city increasing permanent housing opportunities for New Yorkers experiencing homelessness.

Although SOTA has the potential to ameliorate homelessness, there are a few key recommendations that should be implemented in order to ensure the success of this program. In 2019, the City of New York Department of Investigation found several shortcomings in processes and practices related to SOTA, particularly in placements outside of New York City.<sup>5</sup> There were multiple instances in which DHS placed clients in units with insect and vermin infestations, as well as units lacking valid occupancy certifications and heat.<sup>5</sup> There were several health and safety hazards affecting the habitability of SOTA properties due to improper

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<sup>3</sup> National Alliance to End Homelessness. (2016, April). *Fact Sheet: Housing First*. <http://endhomelessness.org/wp-content/uploads/2016/04/housing-first-fact-sheet.pdf>.

<sup>4</sup> Quirk, V. (2016, July), Breaking Ground: Using Housing to Reduce Health Care Costs. *Metropolis*.

<sup>5</sup> The City of New York Department of Investigation. (2019). (rep.). *DOI Report on HRA'S Special One-Time Assistance Program Reveals Flaws that Led to Homeless Clients Being Placed in Unsafe Housing Outside of New York City*. New York, New York.

oversight, lack of training for inspectors, and insufficient paperwork.<sup>5</sup> In February 2019, DOI Commissioner Margaret Garnett stated:

“Our investigation showed some SOTA families placed in housing outside of New York City were living in squalor under the roofs of unscrupulous landlords, who collected tens of thousands of dollars in rental payments upfront from the City to provide these subpar conditions with little risk of accountability for their actions. DOI will continue to monitor DSS’ implementation of reforms to this program to ensure City funds are not wasted and homeless families are given a real chance to succeed.”<sup>5</sup>

Considering this statement from the DOI Commissioner, it is clear that there have been several flaws in both the design and implementation of the SOTA program. However, the Human Resources Administration, HRA, has been extremely receptive in implementing feedback from these critiques. For instance, following this report, they changed the brokers form to include compliance standards outside of New York City, holding landlords accountable for the living conditions of their residents regardless of where they live.<sup>5</sup> Additionally, HRA responded to this report by creating a Rental Assistance Integrity Unity (RAI) that conducts quality assurance walk-thoughts for SOTA apartments within New York City, and performs quality assurance reviews for SOTA apartments outside of New York City.<sup>5</sup> Furthermore, although there have been shortcomings in the design and implementation of SOTA in the past, HRA and DHS are actively incorporating feedback and recommendations in order to improve this program and optimize its benefits for the New Yorkers.

Another critique of SOTA is that it relocates homeless individuals and families from New York to New Jersey. From August 2017 to August 2019, about 5,100 households moved out of the shelter system with SOTA vouchers, and 1,200 of those recipients moved to Newark, New

Jersey.<sup>6</sup> The lack of affordable housing opportunities in New York City led many individuals who were formerly residing in shelters to move to less expensive communities, such as Newark. Thus, alongside the implementation of SOTA, there must also be an investment in more affordable housing options within New York City. Residents should have the opportunity to stay in the city they're living in, rather than being forced to move to other cities that may not be able to handle the influx of people and the stress on their housing market.

In conclusion, New York City is uniquely positioned to implement innovative housing solutions. Since the city is governed by a right to shelter mandate, temporary housing must be provided to every man, woman, and child who is eligible for services.<sup>7</sup> Not only does this set New York apart from cities across the country, but it can also be expanded upon and taken a step further. It is clear from the argument stated above that access to permanent housing is beneficial economically and socially for homeless individuals of all ages. New York has the opportunity to be a national leader in implementing progressive housing policies that both alleviate the current situation of homeless in the city, while also preventing future homelessness through access to social services and the implementation of the Housing First approach. I urge you to approve SOTA in pursuit of improving the quality of life for countless New Yorkers who are currently facing the precarious state of temporary housing and uncertain futures.

Sincerely,

Suzanne Goldberg

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<sup>6</sup> Stewart, N. (2019, December 3). *They Ended Up in Decrepit Housing in Newark. Is New York to Blame?* The New York Times. <https://www.nytimes.com/2019/12/03/nyregion/nyc-homeless-newark-housing-vouchers.html>.

<sup>7</sup>Department of Homeless Services. (n.d.). Shelter. <https://www1.nyc.gov/site/dhs/shelter/shelter.page>.