Comments on Proposed Rental Assistance Programs

In these Comments, I am only addressing a few sections of the proposed regulations.

* Intro 146 is a critical and necessary improvements to the CityFHEPS vouchers. As stated in the Proposed Rules, HRA proposes to exercise its discretionary authority over the CityFHEPS maximum rents by increasing these maximum rents immediately. HRA should do that on September 1, 2021.
* For too many years, CityFHEPS voucher holders have been unable to find housing despite having vouchers in hand. Raising the voucher rates to align with Fair Market Rent (FMR) is a vital change that will get homeless and housing-insecure New Yorkers into housing faster.
* The procedures to ensure that eligible people receive vouchers as quickly as possible must be immediately implemented. HRA should support its case managers and third-party providers by promoting an understanding of the new Rule and voucher levels, and ensuring that procedures to apply and process applicants are accessible and streamlined.
* This law comes at a critical time. With the Delta variant surging and COVID cases dramatically increasing, the City must use Intro 146 as a tool to de-densify congregate shelters--which are not CDC-compliant--by getting people into housing faster.
* The new definition of “street homeless” (Section 10-01 [nn]) is an improvement since it no longer requires 90 days of case management services to qualify as street homeless.
* Establishing a project-based version of CityFHEPs that will enable the City to provide long-term assistance to household moving into permanent housing operated by non-profits under contract with the City is a necessary addition to expand possibilities for affordable housing.
* As soon as the proposed regulations are implemented (which should be on September 1, 2021 as discussed above), there are a number of a problems that need to be corrected. One critical issue that needs to be changed is the “income cliff” which results in enrolled participants not being able to earn more than 250% of the federal poverty level. Prior versions of the bill did not have the existing income restrictions.
* HRA should also change the size apartment limitations in the FAQs information about CityFHEPS posted on the HRA website on August 27, 2021 (<https://www1.nyc.gov/site/hra/help/cityfheps.page>). The apartment and family size rules should, at a minimum, be the same as those for NYCHA and Section 8. (<https://www1.nyc.gov/assets/nycha/downloads/pdf/S8_%20PH%20Occupancy%20Standards.pdf>). For example, the NYCHA housing occupancy standards clearly make distinctions for apartment size based on the age and gender of the children in the family and those for Section 8 have two-bedroom size for two-person family if parent and child of different genders.

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