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**Comments from New Destiny Housing on
HRA Proposed Amendments of Rental Assistance Program Rules
August 30, 2021**

New Destiny Housing commends HRA and Mayor de Blasio for choosing to immediately increase the maximum rents for CityFHEPS to the Section 8 levels, as well as creating a project-based version of CityFHEPS.

While these enhancements make CityFHEPS more effective, New Destiny urges the agency to change the CityFHEPS eligibility criteria to ensure timely access and disrupt the shelter-to-shelter cycle; and to protect long-term stability by modifying the income criteria for renewal eligibility.

The proposed amendments require a qualifying shelter stay of 90 days for initial eligibility (§ 10-04). As an organization committed to ending the cycle of domestic violence and homelessness, New Destiny has serious concerns with this criterion. For families that have already gone through the double trauma of abuse and homelessness, this 90-day requirement almost guarantees that families in the DV shelter system waiting for this assistance will need to uproot their family and transfer to another shelter system before becoming eligible. The City's data on HRA DV emergency shelter exits demonstrates that households, especially families with children, are more likely to transfer from DV emergency shelter to another shelter rather than moving to permanent housing, upon reaching the state-set 90-day limit. The Department of Social Services' 2020 Annual Report on Exits from NYC Domestic Violence Shelters shows that 53% of the 2,341 families with children that exited the HRA DV emergency shelter were transferred to other shelters. That is 1,241 families with minors that left shelter for yet another shelter.

HRA can disrupt this unnecessary stream of homeless families into the DHS system by greatly reducing or removing the 90-day qualifying shelter stay requirement. Prioritization should be rooted in the principle of caring for the most vulnerable first, and not an arbitrary amount of time in shelter.

Similarly, under the proposed amendments, households' total gross income cannot exceed 250% of Federal Poverty Line (FPL) in order to remain eligible for CityFHEPS (§ 10-08). At \$32,200 for singles and \$54,900 for families of three, 250% FPL is an extremely low income ceiling for a high-cost city, such as New York. This clause will force CityFHEPS recipients to make the impossible choice between earning higher incomes, as they work towards economic stability, and remaining in their homes.

We urge HRA to remove this renewal eligibility requirement and instead allow households to continue to be financially eligible until 30% of their adjusted income equals the total rent amount.

Thank you for the opportunity to submit public comments. I welcome any questions.

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New Destiny Housing is a 27-year-old nonprofit committed to ending the cycle of domestic violence and homelessness. We develop new affordable housing with voluntary on-site services and through our rapid rehousing program, HousingLink, we connect survivors of domestic violence with safe, permanent housing in New York City. New Destiny is a co-convener of the Family Homeless Coalition, a broad-based coalition of shelter and housing providers, advocates, and other nonprofits helping homeless families in NYC.