



Comments from Win (formerly Women In Need, Inc.)  
On The Human Resources Administrations Proposed Rule Changes Related to CityFHEPS

Win would like to express our support for the New York City Human Resources Administration's (HRA) proposals to increase eligibility and simplify the administrative process for the City Fighting Homelessness and Eviction Prevention Supplement (CityFHEPS) program.

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 we house over 14 percent of homeless families with children in New York City. 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 like CityFHEPS have been key to this success. These subsidy programs are widely recognized as one of the most effective tools to combat homelessness. When they are 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, at times it can be difficult to qualify for and access these vouchers. Win is therefore supportive of the changes proposed by HRA to expand the eligibility criteria for rental subsidies and to reduce the administrative inefficiencies in the voucher application process. We anticipate that these changes will lead to a more inclusive housing process and help elevate families out of poverty and into permanent housing. The new introductions to the CityFHEPS process, such as expanding eligibility to single adults whose earnings are slightly above 200 percent of the federal poverty level, have the potential to interrupt the cycle of homelessness and put individuals on the path to their forever home. Now, low-income individuals will no longer be fettered to minimum wage jobs without any opportunity for growth. Additionally, working individuals will be able to retain more of their income thanks to a new HRA rule that will reduce the monthly contribution of CityFHEPS tenants who move into single-room occupancy units from 30 percent of their income to a maximum of \$50 per month. For those who are in a place to contribute more of their earnings to housing costs, the proposed changes will allow for more flexibility to choose spaces with rents above the CityFHEPS maximum. This is a small but significant concession in a city with such an extremely tight and competitive housing market.

Additionally, as the new rules would reduce the hours that families are required to work to become eligible for the voucher, more individuals will now have their working hours count towards a housing voucher as they balance a part-time job with other responsibilities like childcare and education. Win is eager to observe the impact this will have on our families and the young mothers we house, as strict work requirements can sometimes penalize single parents with small children who are unable to work full time. Likewise, for families who devote their time to care for children with disabilities, CityFHEPS will now be an option to move out of shelter and into safe and permanent housing by using the SSI they receive to qualify for the voucher.

Overall, Win applauds the administration for proposing these initial reforms and moving towards a more



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just housing voucher system. These changes will bring CityFHEPS closer to its potential to end the City's homelessness crisis and will open the door of possibilities and permanent housing for New Yorkers in need. There are, however, aspects of the CityFHEPS process that can still be improved. We hope the Administration will consider additional reforms to eliminate housing barriers for families. We appreciate that the CityFHEPS voucher is an impressive and work-intensive program for the Administration to operate, and we thus encourage the City to increase its staff who review applications for CityFHEPS. Especially with the new reform and the expected increase of eligible families, HRA should hire additional employees and invest in its current rental assistance vouchers team. Increased staffing to address the current shortages should help mitigate the delays in the CityFHEPS process, which currently can cause an eligible family to remain in shelter for many additional months if not years. Rather, we would like to see reform that ultimately reduces the CityFHEPS application turnaround time to a 30-day maximum. Presently, families still face bureaucratic barriers in utilizing their CityFHEPS vouchers, but the Administration has the power to eliminate these remaining issues and make CityFHEPS the City's solution to homelessness.

To make this more efficient program a reality, there are administrative changes that can be enacted to expedite the voucher process and to decrease the overhead and overall money spent on homelessness. Ending the 90-day rule, an arbitrary criterion for many city rental assistance programs, can save the Administration thousands of dollars a month and prevent families from experiencing unnecessary trauma associated with prolonged homelessness.<sup>1</sup> As the City's social services infrastructure strives to accommodate a major influx of migrants, many of whom are ineligible for rental assistance, it is necessary to prioritize moving families who are eligible for vouchers out of the system now. By repealing the 90-day rule, the city can move these families into a home of their own and increase shelter capacity for newly arrived individuals.

To further ameliorate the strain on the shelter system, Win recommends expanding CityFHEPS eligibility to all New Yorkers in need, regardless of immigration status. New arrivals are frequently reliant on shelter for housing and basic needs and often become long term stayers, due to their exclusion from almost every rental assistance program. As such, this situation and other systemic barriers force immigrant families into prolonged poverty. Awarding all New Yorkers the option to break the cycle of homelessness through the CityFHEPS voucher will promote fairness and maintain the integrity of the nation's most expansive social services system.

Within the rules and exemptions of CityFHEPS, Win also urges the Administration to eliminate the Utility Allowance Deduction and the Rent Reasonableness Standard. Instead, Win believes the utility policy should be that tenants can rent units that cost the total voucher amount, regardless of whether utilities are included. This change would be akin to the Section 8 program rules and push the City closer to parity with this program. Likewise, with the Rent Reasonableness Standard, despite an apartment's rent being at or below a family's voucher amount, a family can still lose out on housing because the City does not believe the rent is "reasonable" compared to other equivalent apartments in the area. The City should

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<sup>1</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=verify%20wall>



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eliminate these policies that keep families in shelter for longer by complicating the CityFHEPS process with unnecessary rules and reducing a voucher amount.

Finally, throughout the process, there should be more transparency for tenants, landlords, and social services staff. Win suggests putting an online tracking system or portal in place to streamline communication between CityFHEPS staff and applicants. Currently, tenants are often forced to start the voucher process anew each time there is an omission in their application, but an online platform to resubmit this work and communicate with staff would lead to a faster voucher review process and a decreased workload all around. Additionally, to ensure families and landlords have the support they need, the customer service line should be expanded to assist both landlords and families with the voucher. For CityFHEPS to be as effective as possible, HRA, landlords, and voucher holders must be able to communicate and work together. These additional administrative reforms, coupled with the Administration's current proposals, have the potential to solidify CityFHEPS as the City's answer to ending homelessness.

Ultimately, we commend the Administration's ability to make the system more just and we look forward to observing how the program's increased eligibility and flexibility will impact our shelters' parents and their children. We hear constant success stories of our families moving out of shelter and into homes of their own through the CityFHEPS voucher, which provides the key to a future of stability and comfort after periods of trauma and transition. Rental assistance subsidies are an essential tool in the fight to end homelessness in New York City. Changes are necessary for the voucher to work as effectively as families living in shelters need it to, and we appreciate the Administration's proposed changes. Nevertheless, we hope the Administration continues to consider additional reform. By implementing the recommendations outlined here, New York City can get one step closer to ending the cycle of housing instability and homelessness for New York's most vulnerable residents and their children.