



**HOMELESS SERVICES UNITED**

307 W. 38TH STREET, 3RD FLOOR  
NEW YORK, NY 10018  
T 212-367-1589  
www.HSUnited.org

September 14th, 2023

HRA Rules  
c/o Office of Legal Affairs  
150 Greenwich Street, 38th Floor  
New York, NY 10007

Subject: CityFHEPS Program Eligibility Amendments

Dear HRA Rules:

I am writing on behalf of my organization, Homeless Services United to submit public comments for the proposed amendments to Title 68 of the Rules of the City of New York, for the CityFHEPS rental assistance program.

**HSU applauds the City for permanently removing the 90-day length of stay requirement for single adults and families experiencing homelessness.** No one should be forced to reside in shelter for 90 days to qualify for a voucher. The solution to homelessness is housing.

**HSU opposes the proposed implementation of a 10-hour per week work requirement for single adults.** And while lowering the work requirement for families is a step in the right direction, the City should move to strike employment status as a requirement to comply with local law 102. At a time of record homelessness, the City should be easing requirements to access permanent housing, not making it more difficult to qualify for a rental assistance voucher.

**We urge the City to expeditiously implement all pieces of the CityFHEPS legislation package to prevent more households from being evicted and becoming homeless, and hasten more exits from shelter to permanent housing, creating much needed shelter capacity for others without viable housing options.** The Council resoundingly passed this bill package by a veto-proof majority because helping more people access permanent housing is both the humane thing to do and makes good fiscal sense. **OMB Budget Director Jiha emphasized in his recent letter to City Agencies that expediting move outs from shelter is a priority to reduce costs, and swift implementation of these laws will enable the City to achieve that goal.**

- **Local Law 99 of 2023 to stop deducting the cost of utilities from the maximum rental allowance of a voucher.**
- **Local Law 100 of 2023 to remove shelter history as an eligibility requirement for CityFHEPS “in community”.**
- **Local Law 101 of 2023 to expand eligibility for CityFHEPS anyone at risk of eviction or experiencing homelessness.**
  - While the proposed rule change would partially implement this law through removal of the 90-day requirement, the City must also widen eligibility for households at risk of eviction.
- **Local Law 102 of 2023 to remove employment status as an eligibility criteria for CityFHEPS and increase the maximum income eligibility limits from 200% of the Federal Poverty Limit (FPL) to 50% Area Median Income (AMI).**



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The City must move swiftly to ensure as smooth an implementation of these local laws as possible. Further delays mean families and individuals at risk of eviction may lose their homes and become homeless, and those already experiencing the trauma of homelessness will be forced to linger in shelter instead of finding a place to call home. Homeless Services United stands ready to work with the administration to implement these laws so that more New Yorkers can access and maintain permanent housing.

If you have any questions, please contact me via email at [elee@hsunited.org](mailto:elee@hsunited.org).

Sincerely,

Eric Lee  
Director of Policy and Planning