

Urban Pathways
575 8th Avenue, 16th Floor
New York, NY 10018

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



Subject: Comment on Proposed Amendments to Chapter 10 of Title 68

Dear HRA Rules:

I am submitting this comment on behalf of Urban Pathways regarding the proposed amendments to Chapter 10 of Title 68 of the Rules of the City of New York, which would change the eligibility for the CityFHEPS program.

Urban Pathways is a nonprofit homeless services and supportive housing provider serving single adults. Last year, we served 2,179 unique individuals through a full continuum of services that includes street outreach, drop-in services, Safe Havens, extended-stay residences, and Permanent Supportive Housing in Manhattan, Brooklyn, Queens, and the Bronx.

Urban Pathways supports the permanent removal of the qualifying shelter stay of at least 90 days in order to be eligible for CityFHEPS rental assistance. The requirement for households to reside in shelter for 90 days before they can become eligible for a CityFHEPS voucher has only served to prolong homelessness for those in need of housing solutions. This is especially imperative considering the length of stay in shelter expanding year over year. According to the Mayor's Management Report, the average length of stay is well over one year for all categories, with average stay in FY22 at 509 days for single adults, 534 days for families with children, and 855 days for adult families. Eliminating the 90 day waiting period is a positive step that will help individuals and families begin their housing search more quickly.

Urban Pathways opposes the proposed implementation of the requirement for households to work 10 hours per week in unsubsidized employment or a subsidized work program in order to be eligible for CityFHEPS rental assistance. While the proposed 10 hours lowers the work requirement from the current 14 hours, imposing any work requirement is in direct conflict with Local Law 102, which eliminates work requirements entirely from the CityFHEPS program and is set to take effect 180 days from the date of passage on July 13, 2023. The Administration should not be implementing a rule change that is in direct conflict with the current local law.

We urge the City to implement all elements of the four local laws (Local Laws 99, 100, 101, and 102 of 2023) established by the CityFHEPS bill package as quickly as possible, and at

the very least within the required 180-day timeframe. Together, these new laws will strengthen the CityFHEPS subsidy to both make it more usable to obtain permanent housing for people currently experiencing homelessness and to prevent households from losing their housing in the first place. Increasing the speed of getting individuals and families housed while preventing evictions will help to ease the current burdens on the city's shelter system.

If you have any questions or require additional information, please reach out to me by email at nmcvinua@urbanpathways.org or by phone at 212-736-7385, x233.

Sincerely,

Nicole McVinua, LMSW
Director of Policy
Urban Pathways