



New York City Human Resources Administration Rules
c/o Office of Legal Affairs
150 Greenwich Street, 38th Floor
New York, NY 10007
Transmitted via: E-Mail only to NYCRules@hra.nyc.gov

Re: CityFHEPS Rule Changes—Project CRIB

To Whom It May Concern:

Volunteers of America-GNY would like to express concerns regarding client choice and informed consent in the Project CRIB evaluation design. While the program itself will likely benefit participants, the methodology and underlying research questions for the evaluation remain unclear. While we understand that persons selected to participate in Project CRIB can opt out, the evaluation design may detract from its ability to be truly voluntary and adhere to informed consent principles. For example, if persons are placed into the randomly assigned an intervention (Project CRIB, Pathway Home or control/the regular PATH application process) prior to being informed that they are being selected for a study and are only told after the fact that they can choose not to participate after being informed of their selection, this would not seem to be truly voluntary. The following questions speak to our concerns, and we hope you will consider them as you continue with the design and implementation of the project.

Client Choice Questions:

- Are people put in the randomizer first before being selected to participate in the evaluation? If so, the study is not truly voluntary and may not be ethical
- At what point in the process are selected individuals able to opt-out?
 - If clients are only informed of the evaluation after being assigned to an intervention and then invited to opt out, this design may have an unintentionally coercive effect
 - Can those that are selected for a particular intervention choose to not participate and also opt-out of outcomes tracking?

Informed Consent Questions:

- Will all applicants to shelter be notified of the project?
- What information is shared with selected participants? Is all information about each potential intervention (Project CRIB, Pathway Home, control/regular PATH process) shared with participants so that they adequately understand the program and what participation entails and what would be different if they opted in to the randomizer?
- Is any information omitted as part of the project design?
 - Material omissions would not result in true informed consent and therefore present ethical concerns.

Respectfully submitted,

Taysha Milagros Clark-Reid