

May 30, 2025

New York City Human Resources Administration

Submitted via <http://rules.cityofnewyork.us>

Re: CityFHEPS Rule Changes

Housing Works **strongly opposes the proposed change to the CityFHEPS Rule that would increase the household contribution from 30% to 40%** for those who renew beyond five years and have earned income, leaving those formerly homeless, low-income households rent-burdened.

Housing Works is a healing community founded in 1990 with a mission to end the dual crises of homelessness and AIDS. Housing Works currently provides a range of integrated health and social services for over 15,000 low-income New Yorkers annually, with a focus on the most vulnerable and underserved—those facing the challenges of homelessness, HIV/AIDS, mental health issues, substance use disorder, other chronic conditions, incarceration, and most recently, migrants displaced from their homes due to violence or other crises who seek safety and a better life in the United States.

HRA Must Not Add to NYC's Rent Burdened Households

It is widely understood, as the U.S. Department of Housing and Urban Development has stated, that rent burden is a form of housing instability that is defined as a household spending more than 30% of their income on rent. For that reason, it is standard that rental assistance programs, including the CityFHEPS program, a tenant is required to pay 30 percent of their income toward rent and the government covers the balance between that amount and what the landlord charges—up to a certain payment standard.

The proposed Adams Administration rule change would undermine the stability of as many as 30,000 low-income New York households who used the CityFHEPS program to move to permanent housing during 2019 and 2020 by increasing their rent from 30% to 40% of household income.¹ The overall proportion of New York City residents already paying more than 30% of their income for rent is extremely high (52.1%), especially given the number of rent-regulated apartments in the City, with Black and Hispanic/Latino households disproportionately impacted by both rent burden and the experience of homelessness. **It is simply unconscionable for the Human Resources Administration to add to the number of rent-burdened City households, especially low-income households with a history of homelessness.**

Rent Burden Harms Individuals and Families

When households spend a significant portion of their income on rent, they may experience difficulties affording other necessities, including food, transportation, medical care, and childcare. The low-income households that rely on CityFHEPS vouchers are already struggling to

¹ Community Service Society of New York, *The City's Rent Hike Plan for Voucher Holders Will Backfire*, May 2025, https://smhttp-ssl-58547.nexcesscdn.net/nycss/images/uploads/pubs/052125_CityFHEPS_40PercentIncrease_response_V4.pdf

make ends meet in New York City, and an added rent burden will further undermine their financial stability.

Rent burden of over 30% of income has been shown to be linked to eviction, and extremely harmful to mental and physical health, even increasing the risk of premature mortality after controlling for other factors.² **The proposed rent increase will undermine the stability and mental and physical health of already vulnerable New Yorkers who rely on CityFHEPS vouchers.**

The “Savings” Associated With Increased Rent Are Illusory

HRA has testified that imposing this rent increase on low-income CityFHEPS voucher holders will save the City just \$11million per year, however this estimate does not consider the impact of rent burdening these households. Formerly homeless tenants unable to meet the higher rent may require “one-shot” deals or other emergency rental assistance to cover arrears, and if only a small percentage face eviction these “savings” will evaporate, exposing individuals and families to the trauma of a return to homelessness and the City to the much higher costs of shelter, jails, and/or emergency care. **The City must not seek illusory “savings” on the backs of some of our most vulnerable neighbors.**

We Urge the City to Carefully Consider the Ethical Risks of the CRIB pilot

Finally, Housing Works urges the City and HRA to carefully take into account the ethical considerations of the Creating Real Impact at Birth (“CRIB”) pilot. As you know, there are ethical challenges involved with randomizing the allocation of rental assistance, which has been repeatedly demonstrated to improve health outcomes for individuals and families. This is especially pertinent when the households involved include pregnant women. The random assignment of participants to different groups, including control groups, can raise ethical concerns, especially if the control group receives no intervention or a less effective intervention than the experimental group. It is critical that all pregnant women experiencing homelessness who present at the DHS Prevention Assistance and Temporary Housing (“PATH”) intake center fully understand the study and that they receive adequate assistance, including eligibility for the CityFHEPS and the Pathway Home rental assistance programs.

Contact

Thank you for the opportunity to submit comments on the proposed rule change. Please do not hesitate to contact me at a.feliciano@housingworks.org with questions or to provide further information.

Yours truly,

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² See, e.g., Denary W, et al. Does rental assistance improve mental health? Insights from a longitudinal cohort study. *Soc Sci Med*. 2021 Aug;282:114100. doi: 10.1016/j.socscimed.2021.114100. Epub 2021 Jun 5. PMID: 34144434; PMCID: PMC8299474; Yun, J., & Hatch, M. E. (2023). Housing cost, consistency, and context and their relationship to health. *Housing Studies*, 40(1), 161–184. <https://doi.org/10.1080/02673037.2023.2266391>; Graetz N, et al. The impacts of rent burden and eviction on mortality in the United States, 2000–2019. *Soc Sci Med*. 2024 Jan;340:116398. doi: 10.1016/j.socscimed.2023.116398. Epub 2023 Nov 15. PMID: 38007965; PMCID: PMC10828546.