

REBNY | November 5, 2025

The Real Estate Board of New York

Regarding Proposed Amendments to the CityFHEPS Unit Hold Incentive Rule

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY thanks the New York City Human Resources Administration (HRA) for the opportunity to comment on the proposed amendments to the CityFHEPS Unit Hold Incentive rule.

Since the program's inception in 2017, CityFHEPS has been a critical tool in mitigating homelessness, increasing housing stability, and improving long-term health, social, and economic outcomes for New Yorkers. [According to HRA](#), CityFHEPS helped more than 32,000 individuals secure permanent housing in FY 2025 and has supported over 136,000 New Yorkers since its launch. Ensuring CityFHEPS remains a viable bridge from shelter to stable housing is an essential part of addressing the City's persisting housing crisis.

REBNY strongly opposes the proposed rule change, which would abruptly end the longstanding Unit Hold Incentive for property owners who rent to CityFHEPS voucher holders. The Unit Hold Incentive has been a vital component of the CityFHEPS program, providing owners with one month's rent to hold a unit off the market while HRA processes the tenant's voucher application.

The Unit Hold Incentive has been particularly important given the [well-documented delays](#) in voucher processing, which can take several weeks to months. Without the incentive, many owners may be unable to keep units vacant during this processing period, reducing the overall number of apartments available to CityFHEPS recipients. These challenges are further magnified in a housing market where demand far exceeds supply, and finding a unit that meets the program's requirements is already a significant challenge.

REBNY urges the City to maintain the Unit Hold Incentive, as removing this tool will only make it more challenging for voucher holders to secure stable housing. We also look forward to working with HRA, the City Council, and all other stakeholders to make meaningful progress in reducing application processing times and barriers to housing access for CityFHEPS recipients.

Thank you for your consideration of these points.

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