

Responses to Public Comments Received Concerning HRA's Proposed Rule: Living in Communities (LINC) Rental Assistance Programs

---

A public hearing regarding the proposed rule was held on November 24, 2014. At the hearing, interested parties had an opportunity to provide input on the proposed rule. Approximately 30 members of the public attended the hearing, 7 of whom spoke. Also present at the hearing were: Commissioner Steven Banks; Bruce Jordan, Chief Homelessness Prevention Officer; Cecile Noel, Executive Deputy Commissioner for the Office of Domestic Violence and Emergency Intervention Services; Sara Zuiderveen, Deputy Commissioner, Rental Assistance Programs & Legal Service Initiatives; and Emily Sweet from the Office of Legal Affairs. A transcript of the public hearing is attached as Exhibit 1.

In addition to the oral comments received at the public hearing, HRA received one comment via email sent to the Office of Constituent Affairs, one comment received via fax sent to the Office of Constituent Affairs, and two submissions of written testimony at the hearing itself. These written comments are collectively attached as Exhibit 2.

No comments were received via the New York City Rules website or the mailing address provided on the notice of public hearing.

**Responses to Issues Raised During the Public Comment Process**

**Comments directly related to specific features of the LINC programs and/or specific provisions of the proposed rule**

**1. One commenter recommended that the LINC rule should be revised to allow families to receive rental assistance after five years upon demonstration of ongoing need.**

*The five-year maximum period currently set forth in the rule and HRA's and DHS's provision of ongoing aftercare assistance to LINC families are intended to provide participating families with vital case management support and sufficient time to increase their ability to pay their rent before the end of the five-year period. While we cannot guarantee what rental assistance will be available when the five-year maximum period for LINC participation ends, we recognize that there may be some families who may not secure employment with a high enough wage to cover the rent when they reach the five-year LINC limit. For individual families we will do all that we can on a case-by-case basis to proactively avoid the accrual of rent arrears and to prevent their eviction due to nonpayment of the rent, thereby averting their return to the shelter system.*

**2. Two commenters expressed concern that the requirement in LINC I that families must work at least 35 hours per week in unsubsidized employment is too burdensome and recommended that the rule be revised to require fewer hours per week of work.**

*All three LINC programs are designed to move families towards self-sufficiency. By focusing in LINC I on families who are working 35 hours a week, we are targeting families who are most likely to succeed in the community when their rental assistance ends.*

**3. One commenter expressed concern that the requirement in LINC II that families have “some income, earned or unearned” excludes, among others, families whose sole source of income is public assistance and recommended that the rule be revised to include public-assistance recipient families.**

*Although there is a lower employment and income requirement for LINC II than for LINC I, families must start with at least some income in order to have a better chance at self-sufficiency when their rental assistance ends.*

**4. One commenter recommended that the provisions in the LINC II and III sections of the rule that require that households be in compliance with public assistance requirements as a condition of renewal should “be removed or revised to reflect the efforts that public assistance recipients make to restore benefits that are erroneously suspended or terminated.”**

*In response to the above comment, the following language has been added to sections 7-04(b)(2) and 7-05(b)(2) of the rule, which address LINC II and III renewals, respectively: “Prior to the commencement of the renewal period, HRA will review whether a household is meeting all of the eligibility requirements set forth in paragraph (1) of this subdivision and will assist the household with maintaining eligibility as appropriate.”*

**5. One commenter requested clarification regarding how the maximum rents by household size were set and expressed concerns with the difficulty a household may have in negotiating an upward departure from the standard maximum rents listed in the rule.**

*The standard maximum rents set forth in the rule are roughly 14 percent higher than the rent levels in effect for the Family Eviction Prevention Supplement (FEPS) program, which is administered by the New York State Office of Temporary and Disability Assistance (OTDA) for public assistance recipients facing eviction in New York City. However, to address the current crisis in the shelter system, since early November, HRA has exercised its discretion under the emergency rule to certify LINC-eligible households for rents up to the 2014 New York City Housing Authority Section 8 Payment Standards, which are listed below:*

<u>Household Size</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>
<u>Enhanced Maximum Rents</u>	<u>\$1,213</u>	<u>\$1,268</u>	<u>\$1,515</u>	<u>\$1,515</u>	<u>\$1,956</u>	<u>\$1,956</u>	<u>\$2,197</u>	<u>\$2,197</u>

*Until further notice, HRA will continue to exercise its discretion under the final rule to make these enhanced maximum rent levels available to all newly certified LINC households for the duration of their participation in the LINC programs.*

**6. One commenter recommended that the rule be revised to reflect the increased maximum rent levels currently available to new LINC clients.**

*The enhanced rent levels are already referenced in sections 7-06(a)(1) and (b)(1) of the rule, which provide the City with discretion to depart from the standard maximum rent levels set forth in those sections.*

**7. One commenter objected to counting “scholarships, educational grants, fellowships, deferred payment loans for education and veterans’ educational benefits” as income in determining eligibility for the programs and calculating the client contribution towards rent.**

*In the final rule, we have revised the definition of “unearned income,” which now appears at section 7-01(i), to clarify that we are defining and calculating unearned income the same way it is defined and calculated under the Supplemental Nutrition Assistance Program regulation found at 18 N.Y.C.R.R. § 387.10. That provision provides, among other things, for exclusions of monies that are used for or made available to educational institutions for certain specified expenses. See 18 N.Y.C.R.R. § 387.10(b)(3)(iv).*

**8. Two commenters spoke about the need for tenants to have access to legal advice and representation related to housing issues. (One commenter noted this in the context of the LINC programs in particular; the other commented on this as a more general matter).**

*The City has more than doubled funding for anti-eviction legal services during the current fiscal year. In any case, HRA and DHS are implementing early warning systems to allow us to proactively reach out to any tenants experiencing a housing crisis in order to avert the commencement of eviction proceedings.*

**9. Two commenters recommended that regular inspections be part of the LINC program.**

*All LINC apartments must pass an inspection based on Section 8 standards. If tenants have any issues with housing conditions following the inspection, in addition to the resources available through 311, they can call their designated aftercare provider or the HRA LINC Call Center for a referral to aftercare services caseworkers who can assist with mediation with the landlord and filing housing court actions as needed.*

**10. One commenter expressed his desire that LINC participants be required to “give back.”**

*LINC tenants are required to pay a portion of their income to rent. They must also participate in program activities designed to help increase earning potential. As earnings increase, the tenant rent contribution will increase as well.*

**11. One commenter spoke about the need to provide ongoing services to LINC families and another commented on the need to help LINC families find and maintain employment in particular.**

*Robust aftercare services tailored to the individual needs of the families, including assistance with finding and maintaining employment, are an important feature of the LINC programs.*

**12. One commenter expressed his concern that LINC households would need “training” to live in LINC apartments and keep them in good condition.**

*Families who experience homelessness are like hundreds of thousands of other low-income New Yorkers who are our neighbors. An unforeseen financial challenge, unemployment, medical issues, or domestic violence can cause a family to need shelter and temporary assistance to get back on their feet. We note, however, that in order to make the LINC program more attractive to landlords, the City has set aside a special fund for participating landlords that will provide some protection in the event that there is damage to a unit that exceeds the security deposit amount.*

### **Additional Comments**

**Most of the commenters expressed support for the LINC programs, with some of the commenters noting the improvement the LINC programs represent over previous programs, including the Advantage program. Many of the commenters also spoke about the need for programs that will create and maintain quality affordable housing in the City and prevent evictions and homelessness in the first place.**

*As noted at the hearing, the LINC programs are part of a series of reforms that HRA is implementing to address a range of issues relating to employment, education, and training to address poverty and income inequality and prevent homelessness. These in turn are part of the Mayor's larger reform efforts with respect to provision of affordable housing and living wages. For example, for information on the Mayor's five-borough ten-year plan to address the need for affordable housing, please see: <http://www.nyc.gov/html/housing/pages/home/index.shtml>. For more information on the Mayor's Jobs for New Yorkers Task Force plan, please see: <http://www1.nyc.gov/site/careerpathways/report/download-the-report.page>.*

**Exhibit 1**

**Transcript of Public Hearing Held on November 24, 2014**

Public Hearing Transcript LINC Rental Assistance  
Programs Proposed Rule

NEW YORK CITY HUMAN RESOURCES ADMINISTRATION

PUBLIC HEARING: PURSUANT TO THE  
CITY ADMINISTRATIVE PROCEDURE ACT

LIVING IN COMMUNITIES (LINC) RENTAL ASSISTANCE  
PROGRAMS PROPOSED RULE

Date: November 24, 2014  
1:00 p.m.

HELD AT: NYC HUMAN RESOURCES ADMINISTRATION  
  
180 Water Street  
New York, NY 10038

Agency Representatives:

STEVEN BANKS  
Commissioner,

BRUCE JORDAN  
Chief Homelessness Prevention Officer,

SARAH ZUIDERVEEN  
Deputy Commissioner,  
Homelessness Prevention

EMILY SWEET  
Office of Legal Affairs

CECELIA NOEL  
Executive Deputy Commissioner,  
Office of Domestic Violence  
and Emergency Intervention Services

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

INDEX

<u>SPEAKER</u>	<u>Page #</u>
S. Banks	3,10,15,18,20,21
B. Jordan	4,5,10,16
J. Tomasello	5,10
J. Goldfein	10
E. Park	16
Y. Pronman	18
C. Cavanaugh	19
A. Soltys	20
Y. Meyers	21

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

COMMISSIONER BANKS: Good afternoon. This is the hearing pursuant to the City Administrative Procedure Act regarding the city's Living in Communities Program, LINC. There are a number of interpreters here, including sign language interpreters who are going to introduce themselves, in the event that anybody needs those services.

[Introduction of interpreters in foreign dialogue]

CMR. BANKS: Okay, thank you very much. The LINC program is a joint program operated by the Human Resources Administration, together with the Department of Homeless Services. My name is Steven Banks, I'm the Commissioner of the Human Resources Administration. The rule is a rule that is designed to implement a rental assistance program to implement the mayor's priority of addressing homelessness in New York City. It was promulgated as an emergency rule, so that we could begin to provide benefits, and now is being--this hearing is prefaced on the rule as a final rule. I want to point out two developments since we published the final rule. First is that HRA exercise the discretion provided in the emergency rule, and now in the final rule, to provide rents at this particular point in time, up to the 2014 New

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

York City Housing Authority Section 8 payment standard, as was permitted by the state programs. In addition, there is clarification in this final rule that HRA has the discretion to select program participants in any one of the three programs in order to fulfill the purposes of the program, and we are exercising that discretion as well. So without further ado, we're ready to proceed with the hearing. And I don't know if we have a list of those who have signed up who wish to testify. Otherwise we will ask you to form a line, and to proceed to testify. But I see we actually have a list of people that have signed up to testify. Now I'll just introduce Bruce Jordan, who's the Chief Homelessness Prevention Officer of HRA. And sitting at the table is Sarah Zuiderveen, who's the Deputy Commissioner in the Homelessness Prevention area, and Emily Sweet who's in the Office of Legal Affairs.

MR. BRUCE JORDAN: And we're going to have our Cecelia Noel, Executive Deputy Commissioner for the Office of Domestic Violence and Emergency Intervention Services join us. So as the Commissioner indicated, we're going to start the public testimony. And the first person to speak is Joanne Tomorillo [phonetic], Joanne Tomorillo.

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

MS. JOANNE TOMASELLO: Close, no cigar.

MR. JORDAN: Okay, what is it? I'm sorry.

MS. TOMASELLO: Joanne Tomasello.

MR. JORDAN: Okay, thank you. And we're going to limit this to five minutes, okay? Thank you.

MS. TOMASELLO: This is what comes out of my mouth. This topic is like we're - - , we're poor, and the poor stay poor. I guess you can imagine or guess why I came to New York City over 30 years ago. At that time the homeless situation was very big within the drug tragedy community. And I'm overwhelmed, and we're all terrified, obviously, 'cause there's not that many people here. You're talking about where we lived. And I recently lost my apartment that I had in downtown Brooklyn for over 20 years. I was, as tends to be the case, part of the gentrification, and then they can't wait to get me out. I mean I remember living in the East Village in the eighties, and I'm still alive to talk about it. I lived on Ninth Street between B and C. And at that time there wasn't enough housing. This was the word on the street that there wasn't enough housing available for people who needed housing. I disagree with that. I can't imagine that, with all the

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

building and construction that's going on, that there are not enough units to house people who need units. Once upon a time when I had a job, I worked actually in this neighborhood at City Hall Restaurant. There was a busser, he was from the Middle East. This was up until September 11th. And he would always say anytime you would ask him something, why, why, why, can you tell me why? And years later I think about that, 'cause that's the bottom line, why. If you really want to solve this problem, I mean the numbers, I can appreciate the numbers, because they give you something somewhat tangible to work with. But I think you've got to go beyond that. And I mean what is the bottom line? I wonder, how many available apartments--you don't have to answer this, but you probably know the answer--are in the city right now? And then there's this thing called affordable housing. When I was struggling and in housing court to save my apartment, I had to do it on principle, I had to fight. This was on State Street between Hoyt and Bond, downtown Brooklyn, very popular now. When I moved there, there was nothing there. And if you were in the arts, that was kind of cool, 'cause then you could do your work. And I knew you had like communities, and I wondered what is a

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

community, and what is a family? These are things in here. I have all these questions, because I believe questions are the start to the creative process, which is what you have to, I think, do. Everything can't be solved by the formula. You have to beyond that, or below that, or beneath that, or within that. But anyway--forgot where I was on that. See what happens? 'Cause it's so charged here with this homeless situation. Anyway, I remember, because I am old now, and I've been unemployed for a prolonged period of time, and haven't secured gainful employment, I was in my apartment, and every day the--and it was unbelievable that there was water coming down from the ceiling. And at that time when I was working I had a good rapport with my landlords. And when I finally said legal action, you're forcing me to take legal action. And then they did something about it. But why the landlords don't want to solve the problems, I don't know. It's always kind of cosmetic. There was a problem there, I won't go into the details. But what I discovered, because my rhythm had changed, I wasn't just getting up every morning, going out the door to get to my job, and to come home, and then to collapse, and then to start it all over again, I realized that there was somebody

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

who was manufacturing crack cocaine. And I tried everything I could. I went to my council person, I went to the police, I went to the landlord's, of course, first. For whatever their reason was for not going, looking into it, I could only guess. But as a result of that, I developed a chronic--'cause there were toxins in the air, toxins in the water. The sink was backing up every day. And because I'm an old single woman, they don't take my word seriously. I'm not entirely stupid. I'm stupid enough to be first on the list, you see. And they just wore me down. Anyway, on principle, I had to fight them. I went to housing court, which is a whole other monster. Because once upon a time housing court was a civil court, I do believe, and that the landlords and the tenants would meet on equal ground. It's not the case, it's not like that now. 95 percent of the landlords have lawyers. 95 percent of the tenants do not. Legal aid told me this. I did everything I could possibly do on principle, I keep saying that. I had to fight my landlords for the lies and harassment, and the disrepair, you name it. Anyway, so housing court is a real mess. I actually--the last gainful employment I had was working for lawyers who handled moving violations. So I had a little bit

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

of sense of how these kinds of bureaus work. I mean it's like they know each other, and they know how they set up. They will set up the--they will try to get in front of the judge that's going to be in their favor. I saw my landlord's lawyers lie right in front of me three times. They said they never got the mail. Well the mail is delivered whether the mailman's on vacation or not. And then I watched him manipulate the schedule because he knew the clerk, right in front of me. I happened to be standing right there. As a result of losing my apartment, I ended up moving into somebody else's apartment, and now I'm under the umbrella of the DV unit. So these are really hard things. And there's just no reason that people--for the landlords, I just don't--they don't--I understand that they are paying the taxes, and they're paying the six-figure salaries of the people who work within the system. But nonetheless, the burden always falls upon the tenants. Anyway, so I don't know where I'm going to be going now. And a lot of the--I have one more question I'd like to ask. I wonder why the city housing units are so ugly. 'Cause they really don't uplift you as a place to live. I mean there's all these beautiful things going around. And this rent, the rents have got to

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

come down. I don't know that I'll see it in my lifetime, but I'll work for it, because this is out of control, and that's all I can say.

CMR. BANKS: Thank you.

MS. TOMASELLO: I could say more.

MR. JORDAN: Thank you. John Goldfein.

CMR. BANKS: Josh.

MR. JORDAN: Josh. I thought it was John, sorry.

MR. JOSH GOLDFEIN: My name is Josh Goldfein, I'm a staff attorney in the Homeless Rights Project in the Legal Aid Society. I'm here presenting testimony this afternoon on behalf of Coalition for the Homeless and the Legal Aid Society. The Coalition for the Homeless, which was founded in 1981, is a not-for-profit advocacy and direct services organization, and assists more than 3500 homeless New Yorkers every day. The Legal Aid Society is the nation's oldest and largest not-for-profit legal services organization, and represents clients in all five boroughs of New York City. The city's homeless population is currently at all-time record levels. There are more than 58,000 homeless New Yorkers, including 14,000 families, 25,000 children sleeping each night in the city shelter

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

system. These are the highest numbers since the city began keeping track of the homeless population more than three decades ago, and the highest since the great depression of the 1930s. In addition, more than 1,000 families, including 1600 children, sleep each night in the city's domestic violence shelter system administered by HRA. There's also an HPD shelter system, and several hundred kids in run-away homeless youth shelters operated by the Division of Youth and Community Development in the City of New York. In August the de Blasio administration unveiled its plan to provide permanent housing assistance to help homeless families and children move from the shelter system to their own homes. The plan represents a significant step forward in addressing the major cause of soaring family homelessness in New York City, as well as the most glaring policy failure of the previous mayor, the Bloomberg administration's disastrous elimination of permanent housing aid designed to help homeless families leave shelter and remain stably housed. Coalition for the Homeless, the Legal Aid Society, and others, have advocated that the city needs to move at least 5,000 homeless families to permanent housing each year in order to finally reduce the

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

family shelter census - - to allocate existing federal and local housing resources to homeless families, to partner with the state to create new rent subsidy programs. The city's plan accomplishes most of what we recommended. The plan proposes moving 5200 homeless families from shelters into permanent housing over the course of the next year through a variety of programs, including 4,000 families who will be helped by the - - rental assistance programs. While the city's plan is a significant step forward in addressing record family homelessness, there are some unfortunate weaknesses in the plan, the overall city plan. The most notable flaw is the small number of New York City Housing Authority public assistance--public housing apartments allocated to homeless families. Only 750 units per year in the plan, with some small categories in addition to that. We've long advocated that at least 2500 public housing apartments be allocated to homeless families each year, the recommendation that's been echoed by dozens of New York City council members and other advocates. The Housing Authority currently allocates most of its vacant apartments without any inquiry into the housing needs of the applicant family. And it could

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

make many more of its vacant apartments available to homeless families through its existing needs-based waiting list priorities. For the LINC program to be successful at actually reducing the number of homeless families, greater efforts must also be made at the front door of the shelter system to prevent evictions and homelessness. For example, the inclusion of a provision to address victims of domestic violence in the LINC program should be replicated in FEPS, as should the higher subsidy levels, which now more closely reflect the real cost of securing housing in the private market in New York City. There are also some improvements that can be made to the LINC programs themselves, which we'll now address. In general terms, the fact that all three LINC programs provide up to five years of rental assistance, is a significant improvement over the deeply-flawed Advantage program. There are likely to be some families, however, who will continue to need rental assistance beyond five years. We recommend that the rule be revised to provide a good cause waiver allowing families to receive rental assistance after five years on the demonstration of ongoing need. In chapter 703 of the LINC rules, participants in the LINC 1 program are required to be working at

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

least 35 hours per week in unsubsidized employment. This requirement is extremely unrealistic and burdensome for working homeless families. Low-wage workers almost never control the number of hours that they work, their employers do. Many employers of low-wage workers systemically maintain employees' hours, work hours, at less than 35 hours a week. In fact data from the city's previous flawed Work Advantage Program showed that the typical participant in that program worked 30 hours or less per week. This provision should be revised to require that participants work a more realistic number of hours per week, such as at least 20 hours a week. Similarly, in chapter 703, which addresses renewals, the section includes the unrealistic and burdensome requirement that participants work at least 35 hours a week again. This provision should also be revised to require that participants work a more realistic number of hours per week, such as 20 hours per week. Chapter 704 requires that participants in the LINC 2 program must have some income earned or unearned. This requirement effectively excludes a significant number of homeless families with multiple shelter stays who are receiving public assistance benefits, but are not employed and do not receive other public

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

benefits like SSI. Also some recipients may be too disabled to work, but also ineligible for federal disability benefits, while they wait the mandatory period to file for citizenship. The rules should be revised to include public assistance recipient families. Chapter 704 also fails to account for bureaucratic errors which often result in public assistance recipients wrongfully losing their benefits. This provision should be removed or revised to reflect the efforts public assistance recipients make to restore their benefits that are erroneously suspended or terminated. Chapter 705, which addresses renewals after the first year at the program, fails to account for these bureaucratic errors as well. We understand that the city has increased the maximum rents for the three programs, which are described in chapter 706, and brought the rents in line with the federal fair market rent levels. And we recommend that the proposed final will be revised to reflect that change as well. Thank you for the opportunity to testify today.

CMR. BANKS: Thank you.

MR. JORDAN: Thank you. So only two people signed up so far. But once again, we're opening the mic for anyone who did not sign up that actually

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

wants to testify. Please come up. The interpreters are still here too, if that's an issue where you need to speak to someone, or have someone help you get your testimony. So we'll open up the mic, I guess, for another 15 minutes or so to see if anyone wants to come up. It doesn't have to just be testimony, it can be comments, questions, anything on this topic or housing related. Please feel free to come up.

MS. EUN PARK: Could interpreters come up as well?

MR. JORDAN: Of course.

MS. PARK: Hi, my name is EUN Park. I have actually come to the meeting as a Korean interpreter, but I presume you have a great interest in this matter of - - poverty. I was taking some classes at Henry George School, which is located on 30th Street on the east side. And through the free classes, by the way, that are offered there, I learned like this problem of - - poverty is not a matter of now, but it was true, as of 100 years ago as well, and I personally could understand like the first - - came up that there is increasingly more and more vacant spaces in New York City. And I just don't understand how it makes sense that people, like more and more homelessness on the street. So I mean I don't know

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

how far the record of this meeting will go, but I really hope that like they write politicians in their right mind who actually stand for the people would address this issue, and do--make use out of those spaces. Like the classes at Henry George School would again like enlighten you on whatever's going on with this economy, which is completely upside down. 'Cause as any healthy economy should be like, according to the model of Henry George School, is that the services have to be - - . And the - - had to take the middle sector, and agriculture is really what should be supporting the economy. But our like pendulum is like totally upside down right now. And I think it's like a matter of time that like not even just homelessness, but like working people with like minimum wages in general, it's going to like have some sort of uprising. It's like a matter of time, and it's so like obviously like in front of your eyes. And the ones that have the power and authority to do something about it are not doing anything. So that's my two cents.

CMR. BANKS: Thank you.

MR. YONATON PRONMAN: Good afternoon, I'm one of their translators for Hebrew. I just want to say a couple words regarding the program. It's an

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

excellent program. My only thing is my - -  
investigators separate the needy from the greedy,  
which is a lot of times people take advantage of  
different programs. And I think it's important with  
the program is to give back, not just to take. Like  
they had rental assistance programs before, but  
people just give 20 percent, 30 percent, and it ended  
up people didn't give back. So my thing is to help  
out the poor, but also the poor got to give back.  
And I've always been working since the age of 10, 11,  
always had a job. And it's just so important other  
people get jobs. And I think that employment and to  
help them with housing, and then hopefully they can  
rehabilitate themselves, and then work their way up,  
and that's so important. So I hope this program is  
not just giving, but also they have to give something  
back in return, which I like. You know, the - -  
program that helps people, but people give things  
back. So there's always a two-way street. And  
that's what I've always done all my life, is you  
work, but then you give something back. So it's  
called - - which means something good to somebody  
else. So I think this is wonderful, and we have a  
lot of fun, investigators helping out with the  
program. And it's also important for the group to

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

know the positive part of it. A lot of times people get addicted, and you help them get back on the road. But now on the other hand, when they get back on the road, they should never forget to give something back. Say okay, well now you're back in your beautiful apartment and everything else. Now give back 10 percent or 20 percent, whatever it was that you've taken, and that's important. So I appreciate Mr. Banks, and I appreciate the staff and everybody else. So if anybody needs any help, we are there to help them - - for the City of New York. God bless you all, thank you.

MS. COLLEEN CAVANAUGH: Hi, my name's Collen Cavanaugh. I just wanted to say, I work for a legal organization, but I'm commenting kind of on my own behalf. I just really wanted to - - what the gentleman from Legal Aid Coalition for the Homeless said about, specifically, low-wage workers, people who are working, and maybe working the equivalent of full-time hours. Not only do they have very little control over the hours that they work, but their schedules can vary dramatically week to week, which can really create a burden. I don't know what the exact process will be on documenting hours worked. But I would just emphasize that I think it's

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

important for these folks that are working low-wage jobs to--I think it's a great idea to adjust it to a more reasonable number of hours, just 20 hours. Not only because they might not be able to get full-time hours, but that would also be just sort of easier to document if their schedules are--if folks' schedules are varied a lot from week to week or month to month. So thank you.

CMR. BANKS: Thank you.

MR. ANDRE SOLTYS: I came to this meeting as an interpreter. However, I want to share my experience with affordable housing I had. For more than five years I'm looking for house and can't find it. - - reason was the unstable job. And two years ago I got a stable job, and I tried to - - affordable housing. So when I get - - I have a bad experience. They deny me of a future income when I have. Even I try to - - for more than a year, and tell them, well how can you deny me in the future, which I don't have it yet. They said they have a right to do it - - . So the bad experience even - - to the guidance they have, we still can't get the apartment. Even when we are qualified, they can deny you on the future income, which is very surprise - - . That was my experience with it, thank you.

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

CMR. BANKS: Thank you for your comments.

MS. YVETTE MEYERS: Good afternoon. In reading about the program, I think it's a good program. In reality, there are a lot of people that are homeless, not because they want to be homeless. And there are a lot of people that do not have a gainfully job to be able to have a place to stay. So first we have to educate. Then we have to help them get a job that will be able to help them keep the apartment. And I think initially it's a good program. You have to start somewhere. I work for HRA, and so I came on my own. And in reading it I think it's a good program. And I think as long as you can have employers, along with the landlords, linked together in assisting people of need, then I think it would be successful. That's all I have to say. Thank you.

CMR. BANKS: Thank you very much. Okay, if there are no further comments, we're going to close this hearing. We will take into account all the comments that were made as we review the final rule. We appreciate everyone's time and interest, and particularly the people that spoke. And we will certainly consider any written comments that have been submitted to us as well. Also, just by way of

Public Hearing Transcript  
LINC Rental Assistance Programs Proposed Rule

background, this particular program is part of a whole series of reforms that we are implementing at the agency to address a range of issues related to employment, related to education, related to training, and as they all proceed, and to address poverty and income inequality and assistance. Thank you all very much.

[END OF HEARING]

## **Exhibit 2**

### **Written Comments Received**

Testimony of  
Coalition for the Homeless  
and  
The Legal Aid Society

on

**Proposed Final Rule Regarding the Living in Communities (LINC)  
Rental Assistance Programs**

Presented before

The New York City Human Resources Administration

Patrick Markee  
Deputy Executive Director for Advocacy  
Coalition for the Homeless

Joshua Goldfein  
Staff Attorney  
Homeless Rights Project  
The Legal Aid Society

November 24, 2014

We present this testimony on behalf of the Coalition for the Homeless and The Legal Aid Society. We welcome the opportunity to express our comments about the proposed final rule – Rules of the City of New York, Title 18, Section 1, Title 68, Chapter 7 “The Living in Communities (LINC) Rental Assistance Programs.”

### About Coalition for the Homeless

The Coalition, founded in 1981, is a not-for-profit advocacy and direct services organization that assists more than 3,500 homeless New Yorkers each day. The Coalition advocates for proven, cost-effective solutions to the crisis of modern homelessness. The Coalition also protects the rights of homeless people including the right to emergency shelter, the right to vote, and life-saving housing and services for homeless people living with mental illness and HIV/AIDS.

The Coalition operates eleven direct-services programs that offer vital services to our homeless, at-risk, and low-income neighbors – which also demonstrate replicable, effective, long-term solutions. These programs include supportive housing for families and individuals living with AIDS, job-training for homeless and formerly-homeless women, rental assistance to help working homeless people move into private-market apartments, and permanent housing for formerly-homeless families and individuals. Our summer sleep-away camp and after-school program provide hundreds of homeless children with a critical respite each year. The Coalition’s mobile soup kitchen distributes more than 900 nutritious meals each night of the year to homeless and hungry New Yorkers. Finally, our Crisis Intervention Department assists more than 1,000 homeless and at-risk households each month with daily necessities, such as food, clothing, and transportation – as well as eviction prevention assistance, client advocacy, referrals for shelter and emergency food programs, and assistance with public benefits.

The Coalition also represents homeless men and women as plaintiffs in Callahan v. Carey and Eldredge v. Koch. In 1981 the City and State entered into a consent decree in Callahan through which it was agreed that, “The City defendants shall provide shelter and board to each homeless man who applies for it provided that (a) the man meets the need standard to qualify for the home relief program established in New York State; or (b) the man by reason of physical, mental or social dysfunction is in need of temporary shelter.” The Eldredge case extended this legal requirement to homeless single women. The Callahan consent decree and the Eldredge case also guarantee basic standards for shelters for homeless men and women. Pursuant to the decree, the Coalition serves as court-appointed monitor of municipal shelters for homeless adults.

### About The Legal Aid Society

The Legal Aid Society, the nation's oldest and largest not-for-profit legal services organization, is more than a law firm for clients who cannot afford to pay for counsel. It is an indispensable component of the legal, social, and economic fabric of New York City – passionately advocating for low-income individuals and families across a variety of civil, criminal and juvenile rights matters, while also fighting for legal reform.

The Legal Aid Society has performed this role in City, State and federal courts since 1876. It does so by capitalizing on the diverse expertise, experience, and capabilities of 1,100 of the brightest legal minds. These 1,100 Legal Aid Society lawyers work with more than 700 social workers, investigators, paralegals and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in 25 locations in New York City, the Society

provides comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel.

The Society's legal program operates three major practices — Civil, Criminal and Juvenile Rights — and receives volunteer help from law firms, corporate law departments and expert consultants that is coordinated by the Society's Pro Bono program. With its annual caseload of more than 310,000 legal matters, The Legal Aid Society takes on more cases for more clients than any other legal services organization in the United States. And it brings a depth and breadth of perspective that is unmatched in the legal profession.

The Legal Aid Society's unique value is an ability to go beyond any one case to create more equitable outcomes for individuals and broader, more powerful systemic change for society as a whole. In addition to the annual caseload of 300,000 individual cases and legal matters, the Society's law reform representation for clients benefits some two million low-income families and individuals in New York City and the landmark rulings in many of these cases have a State-wide and national impact.

The Legal Aid Society is counsel to the Coalition for the Homeless and for homeless women and men in the Callahan and Eldredge cases. The Legal Aid Society is also counsel in the McCain/Boston litigation in which a final judgment requires the provision of lawful shelter to homeless families.

#### Background:

#### A Welcome Step Forward to Address Record Family Homelessness in New York City

New York City's homeless population is currently at all-time-record levels. There are more than 58,000 homeless New Yorkers, including 14,000 families and 25,000 children, sleeping each night in the municipal homeless shelter system, administered by the New York City Department of Homeless Services (DHS). These are the highest numbers since the City began keeping records of the homeless population more than three decades ago and the highest since the Great Depression of the 1930s.

In addition, more than 1,000 families, including 1,600 children, sleep each night in the City's domestic violence shelter system, administered by the New York City Human Resources Administration (HRA).

In August the de Blasio administration unveiled its plan to provide permanent housing assistance to help homeless families and children move from the shelter system to their own homes. The City's plan represents a significant step forward in addressing the major cause of soaring family homelessness in New York City, as well as the most glaring policy failure of the previous mayor: The Bloomberg administration's disastrous elimination of permanent housing aid designed to help homeless families leave shelters and remain stably housed.

Coalition for the Homeless, the Legal Aid Society, and others have advocated that the City needs to move at least 5,000 homeless families into permanent housing each year in order finally to reduce the family shelter census. We have urged the City to allocate existing federal and local housing resources to homeless families, and to partner with the State to create new rent subsidy programs targeted to homeless families.

The City's plan accomplishes much of what we recommended. The plan proposes moving 5,200 homeless families from shelters into permanent housing over the course of the next year

through a variety of programs, including some 4,000 families who would be helped by the new Living in Communities (LINC) rental assistance programs, which are the subject of this proposed final rule.

While the City's plan is a significant step forward in addressing record family homelessness, there are some unfortunate weaknesses in the plan. The most notable flaw is the small number of New York City Housing Authority public housing apartments allocated to homeless families (only 750 units per year). We have long advocated that at least 2,500 public housing apartments be allocated to homeless families each year, a recommendation that has been echoed by dozens of New York City Council members and other advocates. The Housing Authority currently allocates most of its vacant apartments without any inquiry to the housing needs of the applicant family, and could make many more of these apartments available to homeless families through existing needs-based waiting-list priorities.

For the LINC program to be successful at actually reducing the number of homeless families, greater efforts must be made at the "front door" of the shelter system to prevent evictions and homelessness. For example, the inclusion of a provision to address victims of domestic violence in the LINC program should be replicated in the FEPS program, as should the higher subsidy levels, which now more closely reflect the real cost of securing housing in the private market in New York City. Now more than ever, it is clearly going to be less expensive and less of an administrative burden to avoid housing families in the shelter system than it is to re-house them, even with the LINC program in place.

There are also some improvements that can be made to the LINC rental assistance programs, which we will address in our comments on the proposed final rule below.

#### The Proposed Final Rule:

##### Recommended Improvements to the LINC Programs

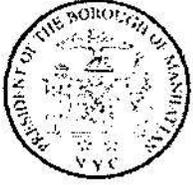
Following are changes that would significantly improve the LINC rental assistance programs. We believe these changes will help assist more families and better ensure the housing stability of formerly-homeless families who secure permanent housing using these programs.

- In general terms, while the fact that all three LINC programs provide up to five years of rental assistance is a significant improvement over the deeply flawed Advantage program, there are likely to be some families who will continue to need rental assistance beyond five years. We recommend that the rule be revised to provide a good-cause waiver allowing families to receive rental assistance after five years upon demonstration of ongoing need.
- Chapter 7-03 (a) (1) (E) requires that participants in the LINC I program be "working at least thirty-five hours per week in unsubsidized employment." This requirement is extremely unrealistic and burdensome for working homeless families. Low-wage workers almost never control the number of hours that they work – their employers do. And many employers of low-wage workers systematically maintain employees' work hours at less than 35 hours/week. Indeed, City data from the flawed Work Advantage program found that the typical participant in that program worked 30 hours or less per week. This provision should be revised to require that participants work a more realistic number of hours per week, such as at least 20 hours/week.
- Similarly, chapter 7-03 (b) (1) (A), which addresses renewals after the first year of the program, includes the unrealistic and burdensome requirement that participants work at

least 35 hours/week. This provision should also be revised to require that participants work a more realistic number of hours per week, such as at least 20 hours/week.

- Chapter 7-04 (a) (1) (F) requires that participants in the LINC II program "must have some income, earned or unearned." This requirement effectively excludes the significant number of homeless families with multiple shelter stays who are receiving public assistance benefits but are not employed and do not receive other public benefits like Supplemental Security Income. Also, some recipients may be too disabled to work but also ineligible for federal disability benefits while they wait a mandatory period to file for citizenship. The rule should be revised to include public assistance-recipient families.
- Chapter 7-04 (b) (1) (C) fails to account for the bureaucratic errors which often result in public assistance recipients wrongfully losing their benefits. This provision should be removed or revised to reflect the efforts public assistance recipients make to restore benefits that are erroneously suspended or terminated.
- Similarly, chapter 7-05 (b) (1) (A), which addresses renewals after the first year of the LINC III program fails to account for the bureaucratic errors which often result in public assistance recipients wrongfully losing their benefits. This provision should be removed or revised to reflect the efforts public assistance recipients make to restore benefits that are erroneously suspended or terminated.
- We understand that the City has increased the maximum rents for the three LINC programs, described in Chapter 7-06, and brought those rents in line with federal Fair Market Rent levels. We recommend that the proposed final rule be revised to reflect that change.

Thank you for the opportunity to offer testimony.



OFFICE OF THE PRESIDENT  
BOROUGH OF MANHATTAN  
THE CITY OF NEW YORK

1 Centre Street, 19th floor, New York, NY 10007  
(212) 669-8300 p (212) 669-4306 f  
163 West 125th Street, 5th floor, New York, NY 10027  
(212) 531-1609 p (212) 531-4615 f  
[www.manhattanbp.nyc.gov](http://www.manhattanbp.nyc.gov)

Gale A. Brewer, Borough President

**Testimony of Gale A. Brewer, Manhattan Borough President  
On The Emergency Rules Establishing the LINC Rental Assistance Programs  
November 24, 2014**

---

My name is Gale A. Brewer and I am the Manhattan Borough President. Thank you to Commissioner Banks and Commissioner Taylor for the opportunity to offer comments on the proposed rules for the LINC Rental Assistance Programs.

New York City today faces a terrible dilemma in our burgeoning population of homeless. The loss of a home is an inestimable life trauma, and as we know, can be deeply harmful to children. The longer the condition of homelessness persists, the deeper the trauma and the more life disruptions occur.

For that reason, I wholeheartedly applaud and support these three programs, LINC I, LINC II and LINC III. Obviously, the number of families involved is small – much smaller than we would like, and only a fraction of what will be needed to truly address the problem. But it represents a good start and a program that can, if successful, point the way to a solution for a larger portion of the homeless problem. While I can see that the LINC I and II Programs can only provide housing for a small fraction of the current homeless population, it appears that the LINC III program, for families currently in HRA domestic violence shelters, will provide significant relief.

As you know, I have been, for many years, deeply committed to finding solutions to both our homeless problem and our lack of housing that is affordable to low income and working New Yorkers. There is no doubt that the two problems are inextricably connected.

If we keep losing affordable housing at the rate we have been in recent years, no program, no matter the size, will really address the problem of homelessness. So most importantly, while we develop programs to move our current homeless population out of the shelter and into permanent housing, we must be sure that any such program – at a minimum – does not exacerbate the ongoing housing loss.

So while I applaud and encourage these programs to alleviate the ongoing trauma of homelessness and shelter confinement for those families that will be fortunate enough to receive the benefit, I would urge the Administration to look at the problem through a bigger lens. It is essential that this effort to house these families not itself contribute to the continuing loss of affordable, regulated housing.

While I am sympathetic to the need to induce landlords to provide the units for these programs, we must make sure that these units are safe, legal housing. This is important for the families, who we hope, through these programs, will be able within five years, to assume the rent and lease responsibilities for these apartments. As we all know, the law currently provides that a rent unchallenged for four years, becomes basically unassailable as the legal regulated rent. So if a rent paid under this program is improperly high, and is not contested during the five-year program period, the family will likely be stuck with that improper, unaffordable rent.

In the last decade, the City has lost more than 100,000 affordable stabilized units – mostly through high rent deregulation. This loss continues unabated, and certainly must be acknowledged as a contributing factor in the growth of our homeless population. Any homeless policy must take this into consideration.

Affordable housing is lost through improper rent increases as well as neglect and deterioration of conditions. Therefore, in addition to building in provisions in these programs to

insure that the rents paid by the City are not improper rents, we should make certain that the families have real opportunities to enforce their rights under the City's housing codes. While I understand the Rules contain a current provision for an initial inspection of the units, there is no provision for regular annual inspection, or enforcement.

I urge you to include in this program access to legal advice and representation for the families involved. The laudable goal of the LINC programs as I read the Rules is to help these families move to housing independence. We must take steps to see that they are as fully empowered as possible to exercise their rights as tenants, on their way to true independence. Good legal assistance does more than solve immediate problems, it can serve to educate, empower and create an understanding of a client's entitlement dignity and the full protections of the law. The LINC Programs are promising efforts to find a way out of our homeless problem. Making sure that free, competent legal services are available to these families will go a long way toward fulfillment of that goal.

Thank you again for the opportunity to voice my position. I look forward to continuing to work with you on this important issue.

**DISTRICT OFFICE**  
150 STUYVESANT PLACE, 6<sup>TH</sup> FLOOR  
STATEN ISLAND, NY 10314  
(718) 556-7370  
FAX: (718) 556-7389

**CITY HALL OFFICE**  
250 BROADWAY, ROOM 1868  
NEW YORK, NY 10007  
(212) 788-6972  
FAX: (212) 312-3045

[drose@council.nyc.gov](mailto:drose@council.nyc.gov)



THE COUNCIL OF  
THE CITY OF NEW YORK  
**DEBI ROSE**

DEPUTY MAJORITY LEADER  
49<sup>TH</sup> DISTRICT, STATEN ISLAND

**CHAIR**  
COMMITTEE ON WATERFRONTS

**COMMITTEES**  
AGING  
CIVIL RIGHTS  
EDUCATION  
RULES, PRIVILEGES & ELECTIONS  
TRANSPORTATION

I respectfully submit these comments in response to the proposed addition of a Chapter 7 to Title 68 of the Rules of the City of New York to continue the implementation of three new rental assistance programs for specific populations within the City's homeless shelter system, previously established by emergency rule.

I represent the 49<sup>th</sup> District—comprising the North Shore of Staten Island—in the New York City Council. I appreciate the work of the Human Resources Administration and the Department of Homeless Services addressing the crisis of homelessness in our city. However, I would like to emphasize that the three Living In Communities Rental Assistance Programs are preliminary measures which cannot fully address the magnitude of the problem of homelessness. These short term measures are indubitably an improvement on the stop-gaps of the previous administration, following recommendations of such organizations as the Coalition for the Homeless. However, they do not go far enough to ensure that families receiving assistance do not return to the shelter system. Thank you very much for the opportunity to submit the following comments.

Regressive policies which gutted affordable housing have severely limited housing stock available to New Yorkers. Under the Giuliani administration, the City lost 33% of its privately-owned subsidized housing stock. Under the Bloomberg administration, the city lost 2/5 of units affordable for households living at 200% of the federal poverty level (\$39,580) for a family of three. Even as the number of "affordable" apartments decreases, the Federal Fair Market Rent continues to far outpace wage growth. A person working full-time at minimum wage will earn \$1,280 each month, before taxes. By contrast, the Fair Market Rent for a one bedroom apartment in NYC is \$1,215. It is not difficult to see how these factors—reduced housing stock, skyrocketing rents, high levels of unemployment or underemployment lingering from the Great Recession, and stagnant wages—combine to create the Perfect Storm of homelessness.

We are at a point where the average *emergency* shelter stay of a family with children is over a year (14.5 months). Under the previous administration, we saw very clearly that stop-gap measures to systemic problems simply do not work. Two out of every three families entering the shelter system had previously been homeless. Temporary subsidies which are subject to the vicissitudes of budget allocations and are capped at 3 or 5 years provide only minimal housing stability to those who live at or under 200% of the poverty

*"Keeping Constituents First"*

level. Previously affordable neighborhoods are seeing annual rent increases of 30%. A family of three living at 200% of the poverty level who squeeze themselves into a one-bedroom apartment at Fair Market Rent will spend over 36% of their income on housing alone, disregarding utilities. It is not a wonder that temporary subsidies do little to mitigate the revolving door phenomenon we see with families exiting shelters. For families with multiple breadwinners, it is difficult enough to gain the financial stability necessary to stay in market-rate housing. For families with disabilities or other long-term impediments to employment, who depend on a fixed income, five years of rent subsidies may do very little to alter their ability to find stable housing after the assistance is terminated.

Obviously, the three LINC programs proposed here offer clear improvements over the Advantage and Housing Stability Plus programs; their terms overlap significantly with recommendations of advocacy groups. Given the significant problem domestic violence poses in my district, I also very much appreciate the inclusion of a LINC program that specifically targets victims of domestic violence. There are only a few points in the elaborated rules which worry me:

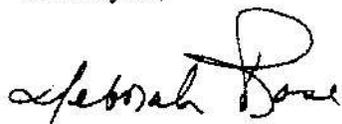
In § 7-01(m), I highly object to the use of (4), “scholarships, educational grants, fellowships, deferred payment loans for education, and veterans’ educational benefits” in the calculation of unearned income which contributes to the gross income used to determine eligibility for LINC programs under §7-03 (a)(1)(G), §7-04(b)(1)(D), and §7-05(b)(1)(E). For families trying to get back on their feet, the ability to obtain an education is crucial for future economic security. If we include educational benefits as a form of income, then we set up a disastrous catch-22 for vulnerable families: they may be forced to choose between the educational benefits which will open doors to higher paid positions and more job security, and the housing benefits which will move them out of the shelter system. We do not want to create a benefit where a child who receives a scholarship to one of the many excellent universities in our city, but who cannot afford to live in campus housing, must choose between her education and her family’s housing status. We do not want to create a benefit that forces our Wounded Warriors to choose between a stable home outside of a shelter and their education. If our goal is to reduce the rate of homelessness in our city, then we must not limit our residents’ ability to build the skill and knowledge sets necessary for employment in our rapidly changing economy.

Additionally, I would like clarification as to how the maximum rents by household size were set. Without any apparent logic to the rates, it seems onerous to force a household to petition HRA for an exemption, if a unit exceeds LINC’s maximum rent but, according to §7-06(a)(1)(iii), “does not exceed the 2014 New York City Housing Authority Section 8 Voucher Payment Standards for the same type of unit.” Being as the rate referenced is considered to be the fair market rate for a type of unit, it seems unreasonable that, on top of all of the other complicated processes an applicant must negotiate, they must also justify why they were unable to find an apartment at below market rate. Furthermore, there is no indication in to §7-06(a) or (b) that HRA intends to alter the maximum rent on a yearly basis to match overall increases in rents when renewing rental assistance. As such, a family whose apartment was under the maximum rent the first year could very

easily find themselves forced to petition for an exemption the second year. The determination of maximum rents needs to be reconsidered and elaborated upon.

Although the three LINC programs are a step in the right direction, they do not get to the root of the homelessness crisis in our city: the lack of affordable housing. The de Blasio administration must work for permanent solutions for families in need. Former Mayor Koch saw great successes in reduction of homelessness by giving homeless families with children priority for a small number of NYCHA units and Section 8 vouchers. Only 1.4% of homeless families placed in NYCHA units returned to shelter; fewer than 4% of those granted vouchers returned to shelter. The NYC Independent Budget Office suggests that reintroducing priority access to federal housing subsidies for 2,500 families could reduce shelter system costs by \$14.7 million.<sup>1</sup> The LINC programs speak to this administration's commitment to curtailing homelessness. However, we must be certain that we do not view these temporary subsidies as the final cure for an issue which must be addressed permanently and systemically.

Thank you,



Councilmember Debi Rose  
NYCC, 49<sup>th</sup> District

---

<sup>1</sup> All statistics come or are derived from the Coalition for the Homeless' "State of the Homeless 2014" report, found here: <http://www.coalitionforthehomeless.org/state-of-the-homeless-2014/>

**From:** Saenz, Gloria (DFA)  
**Sent:** Friday, October 24, 2014 4:37:31 PM  
**To:** Constituent Affairs  
**Subject:** FW: HRA and DHS Proposal

---

In the same order, you may need the whole HRA operations working for this cause. This includes home health assistants for disable customers who are the majority of the population and other services the agency usually need. Once established in the apartments or houses, and once they can acknowledge where they are, you may need to follow up with other type of help to guide them and help them catch up with the rest of the population. You need faith and patience and a firm believe that the change can be done.

Good luck and may the Lord bless you

**From:** Saenz, Gloria (DFA)  
**Sent:** Friday, October 24, 2014 3:47 PM  
**To:** 'constituentaffairs@hra.nyc.gov'  
**Subject:** HRA and DHS Proposal

Proposal:

To implement the Mayor's priority of moving families from shelter into stable housing, and in a joint effort with the Commissioner of the New York City Department of Homeless Services (DHS), the Commissioner of the New York City Human Resources Administration (HRA) proposes to add Chapter 7 to Title 68 of the Rules of the City of New York to continue the implementation of three new rental assistance programs, which are targeted to specific populations within the City's homeless shelter system

I think the proposal is one of the most aggressive ones I have heard of since I leave in this country. I got here in 1979.

My comment is that the move has to be a transitional move and the chosen single persons or families have to be trained to live in these apartments or houses. If these are rent controlled apartments, these must be visited by inspectors who need to report damages in the first instance they are noticed. Otherwise, money that goes toward repairs and constant maintenance can create overwhelming work that never ends to the landlord. You do need to hire a management team that is honest, active and that want to change the ways city apartments are taken care off.

You may get deals on merchandise from selected stores such as Home Depot or bid for lower repairs and prices on contracts and keep a tide control on money that goes to the repairs or projects. We really do not want a sector of the population getting richer on the money that is assigned to help poor families in the City that never sleeps.

Gloria Saenz  
(929)221-4663  
Staff Analyst II  
Human Resources Administration  
Office of Child Support Enforcement