

TRINITY CHURCH WALL STREET

Trinity Church Wall Street - Testimony – DSS/HRA Rulemaking Hearing

August 30, 2021 | Subject: Implementation of Int. 0146

Good morning – my name is Natasha Lifton and I am the Director of Government Relations at Trinity Church Wall Street. Thank you for providing me with the opportunity to testify on behalf of Trinity at today’s rulemaking hearing on the enacted Intro. 146 to raise the value of CityFHEPS vouchers in accordance with Section 8 levels.

Trinity Church Wall Street is an active Episcopal church down the street from City Hall with more than 1,600 parishioners who represent all five boroughs and form an ethnically, racially, and economically diverse congregation. In addition to our ministry, Trinity carries out its mission of faith and social justice through direct advocacy and policy change, as well as a robust grant-making program that supports community partners citywide to help break the cycles of mass incarceration, mass homelessness, and housing instability throughout New York City.

As such, we vigorously advocated for the passage of City Council Intro. 146 to raise the value of the CityFHEPS voucher. We thank Speaker Corey Johnson, Council Member Levin, and the entire City Council, along with DSS/HRA and City Hall staff who helped enact this critical piece of legislation.

For years, our grantees and partner organizations, as well as New Yorkers impacted by homelessness, have highlighted how the CityFHEPS program failed to move people out of the shelters and into permanent housing. Even though CityFHEPS is one of the City’s primary tools to help individuals exit the shelter system, the program has made it nearly impossible for homeless New Yorkers to find housing because the value of the vouchers fell grossly short of the cost of an apartment across New York City.

We commend the City Council for working to address this problem by passing Intro. 146 and for ensuring that the final language of the bill guarantees that the value of CityFHEPS vouchers will be set at

fair market value as is the case with Section 8 vouchers. In addition, we are pleased that the legislation extends eligibility for CityFHEPS beyond the current five-year cutoff.

However, we are deeply concerned that language in the final version of the bill related to eligibility creates a steep income cliff for families and individuals who find a better job or get a raise which puts their income above 250% of the federal poverty line. This places them in the untenable position of choosing between a higher income or holding onto their CityFHEPS vouchers if they cannot yet afford their housing without the subsidy. Therefore, we recommend that the City use the rent burden standard that no CityFHEPS voucher recipient should pay more than 30% of their income for rent. This standard was included in the B version of Intro. 146 and is used by the New York City Housing Authority.

In addition, we are concerned that pegging CityFEHPS voucher payments to revised bedroom count and occupancy standards could undermine the program's objective of promoting housing choice and expanding the universe of available apartments for those who would otherwise languish in shelters. Families who find an apartment that passes inspection and rents for the allowable payment standard matching their family size should be allowed to rent that apartment even if the layout has fewer official bedrooms allowed by the current rule. Families should be able to decide for themselves what housing options work best for them if there is no evidence of overcrowding or other hazardous conditions. Therefore, we recommend that the City exclude bedroom count from the revised payment standard guidelines and default to existing inspection standards and resident choice when determining the appropriateness of housing units.

We urge HRA and City Hall to take these recommendations into consideration to ensure that the CityFHEPS program provides New Yorkers with better opportunities to find and keep safe, stable housing, preventing evictions and reentry into the shelter system.

Thank you for providing me with the opportunity to testify today.