



## **Maximizing the Benefits of Housing Vouchers in New York City: Grantmaking and Advocacy Strategies for Robin Hood Foundation**

Policy Analysis Exercise (PAE) Completed By Catherine Darin, MPP 2023

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## Executive Summary

New York City is facing a crisis of homelessness. The client for this PAE, Robin Hood Foundation (“Robin Hood”), wants to help address this crisis by investing in programs and advocating for policies and programmatic changes that will help New Yorkers exit homeless shelters more quickly.

### Problem: Too few people are exiting NYC homeless shelters with CityFHEPS vouchers

CityFHEPS is New York City’s largest rental assistance (i.e., housing voucher) program, which primarily serves low-income households exiting homeless shelters. With a CityFHEPS voucher, low-income households typically pay 30% of their income to rent a private-market unit, and the New York City government pays the remaining portion of the rent (up to a maximum amount). Housing vouchers, including CityFHEPS, have proven to be a critical tool to fight homelessness. Only 0.3% of families who exit NYC homeless shelters with a subsidy (typically a voucher) re-enter shelter within a year, compared to 15.2% of families without subsidies.

While CityFHEPS is known to be an effective program for those *with* vouchers, the problem is that **too few eligible households are using CityFHEPS vouchers to exit homeless shelters**. While exact data is unavailable, I conservatively estimate that 35-45% of households in shelters who are eligible for CityFHEPS use the program each year. [Other sources suggest an even lower utilization rate: for example, In June 2023, a City official stated that the CityFHEPS utilization rate is 5%.] This PAE identifies the barriers and pain points that explain CityFHEPS’ under-utilization as well as opportunities for Robin Hood to increase program uptake through advocacy and grantmaking.

### Key Research Findings

Based on over 40 interviews with homelessness advocates, NYC shelter residents, CityFHEPS voucher recipients, case managers and landlords who work with CityFHEPS, I found that:

- Accessing permanent housing with a CityFHEPS voucher requires overcoming **many structural barriers and operational pain points**.
- The biggest obstacle for people trying to exit shelter with a CityFHEPS voucher is **finding a landlord** who is willing to accept it.
- Landlords do not want to participate in CityFHEPS due to perceived **issues with the program**, especially regarding missed rental payments and application processing delays, as well as **widespread perceptions that voucher holders are “risky” tenants**.
- **Performance issues among shelter staff** exacerbate these challenges. Clients in shelter frequently mentioned that over-burdened case managers and housing specialists offer inadequate support, which leads to prolonged stays in shelter. The likely drivers of

performance issues among shelter staff include **excessively high job demands, inadequate pay, and insufficient training and resources.**

## **Robin Hood should pursue a four-pronged strategy to increase landlord participation in CityFHEPS and address workforce issues at homeless shelters:**

### **Recommendation 1: Advocate for Easy Fixes**

Advocate for the City to adopt low-cost, high-impact improvements to address operational pain points that can help tackle both landlord and shelter workforce-related issues. Proposed programmatic changes include:

- Exempt newly constructed apartment units, which have already been inspected by the City's Department of Buildings, from CityFHEPS inspection requirements
- Reduce redundant requests for information in CityFHEPS application forms
- Increase and publicize enforcement of source of income protections for voucher holders

### **Recommendation 2: Test Interventions to Address Deeper Barriers**

Partner with the City and shelter providers to pilot evidence-based interventions that seek to boost landlord participation and address workforce challenges at shelters. Critically, these interventions can generate information to elucidate key unknowns in order to inform longer-term strategies to address deeper barriers. Examples of proposed interventions include:

- Hire community-based landlord liaisons to recruit landlords to participate in CityFHEPS
- Create a "fast-track" application review process to alleviate landlord concerns about delays
- Offer expanded tenant after-care, including expanded landlord assurance funds
- Launch a Training Academy and anti-burnout programming for front-line shelter staff
- Modestly increase pay and staffing ratios for case managers and housing specialists

### **Recommendation 3: Broaden the Coalition to Improve CityFHEPS**

Broaden Robin Hood's advocacy coalition to include landlords and housing professionals involved with CityFHEPS in order to raise political pressure on the Mayor to prioritize resolving its problems.

### **Recommendation 4: Pursue Other Channels to Increase Affordable Housing Supply**

Advocate for creative policies at the local, state, and federal levels to expand the affordable housing supply in New York City.

## **Conclusion**

This PAE identifies promising opportunities for Robin Hood to improve the usefulness of CityFHEPS for shelter clients given the realities of the City's constraints. To start, Robin Hood should advocate

for the City to address operational pain points through low-cost, high-impact solutions. To address deeper barriers related to landlord participation and shelter workforce performance, Robin Hood should fund pilot programs in collaboration with the City and a handful of shelter providers. By implementing these steps, Robin Hood and its partners can help create a set of best practices in voucher administration, helping to fight housing instability and homelessness on a larger scale.



# Introduction

## PAE Client: Robin Hood Foundation

Robin Hood, the client for this PAE, is the largest poverty-fighting non-profit in New York City.

As a foundation, Robin Hood uplifts low-income households in NYC by building and funding impactful non-profits that help people exit poverty. In the previous year, Robin Hood invested approximately \$172 million in over 900 non-profit organizations in New York City. As an advocacy organization, Robin Hood's Public Policy team advocates for initiatives at the local, state, and federal levels that support low-income New Yorkers.

Robin Hood has a strong track record of collaborating with New York City government and the City's non-profit providers to deliver tangible benefits to low-income New Yorkers.

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### Context: Too many New Yorkers live in homeless shelters. Robin Hood wants to increase the number of low-income New Yorkers who can exit shelter and find permanent housing.

New York City is facing a crisis of homelessness. As of March 30, 2023, there were more than 72,000 people living in New York City-run homeless shelters, nearly 1% of the City's population and an all-time high.<sup>1</sup> The majority of households (62%) in shelter are families with children.<sup>2</sup>

Homelessness can cause devastating consequences, especially for children. Research has shown that living in a homeless shelter results in heightened levels of stress and decreased mental wellbeing.<sup>3</sup> In addition, homelessness has adverse effects on physical health, increasing the risk of infections, traumatic injuries, disabilities, co-morbidities, and premature death.<sup>4</sup> For children, homelessness can have particularly severe effects, causing physical damage to the brain structure and negatively affecting educational, social, and psychological outcomes in the short and long-term.<sup>5</sup>

For these reasons, it is in Robin Hood's interest to improve the well-being of low-income New Yorkers, and particularly families with children, by advocating for policies and investing in programs that will help New Yorkers exit shelter and move into permanent housing more quickly.

In its work to advance housing equity in New York City, and, in particular, prevent and reduce lengths of shelter stays, Robin Hood has advocated for the expansion and improvement of CityFHEPS. CityFHEPS is New York City's largest rental assistance program, which primarily serves New Yorkers experiencing homelessness. With a CityFHEPS voucher, low-income households typically pay 30% of their income to rent a private-market unit, and the City government pays the remaining portion of the rent (up to a maximum amount). While there are several vouchers that are similar to CityFHEPS (e.g., Section 8 Housing Choice Vouchers), Robin Hood has focused its advocacy efforts around CityFHEPS because there are the greatest opportunities for reform at the local level.



Housing vouchers, including CityFHEPS, have proven to be a critical tool to fight homelessness in New York City. The vast majority of households – about 77% - who exit NYC shelters rely on a subsidy, typically a voucher, to do so. Moreover, return rates to shelter are much lower for households who exit with subsidies compared to those who do not, as highlighted in Figure 1.<sup>6</sup>

*Figure 1: Subsidies (vouchers) dramatically reduce return rates to shelters*

<b>% Returning to NYC Shelter Within 1 Year</b>		
	<b>With a subsidy</b>	<b>Without a subsidy</b>
Families with Children	<b>0.30%</b>	15.20%
Single Adults	<b>4.60%</b>	22.10%
Adult Families without Children	<b>0.60%</b>	7.40%

Source: FY22 Mayor’s Management Report

The Problem: Too few eligible households are exiting shelters with CityFHEPS vouchers

Too few eligible households are exiting shelters with CityFHEPS vouchers, as evidenced by low voucher utilization rates and increasingly long stays in shelter. While exact data are unavailable, I estimate that 35-45% of households in shelter who are eligible for CityFHEPS end up using the voucher program each year.<sup>7</sup> [Other sources suggest a lower utilization rate: for example, In June 2023, a City official stated in an interview that the CityFHEPS utilization rate is 5%.<sup>8</sup>] Moreover, even top City officials have remarked that CityFHEPS is “less utilized than we would like because of all the barriers”.<sup>9</sup> Due to such barriers, currently, stays in shelter average 16 to 28 months.<sup>10</sup>

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## About CityFHEPS

CityFHEPS is a rental assistance program administered by the New York City Department of Social Services (NYC DSS) that is primarily used to help households exit from shelter. NYC DSS includes the Department of Homeless Services (DHS) and the Human Resources Administration (HRA).

CityFHEPS vouchers pay fair-market rents for up to 5 years. While CityFHEPS is available for both households in shelter and “in community,” it is predominately used for the former group. For a household in shelter to be eligible for CityFHEPS, the household must: have income below 200% of the Federal Poverty Level, have applied for Public Assistance, be working, a senior, or disabled, and have legal residence in the United States. CityFHEPS was created in 2018 by combining several other NYC voucher programs. Since then, over 26,000 households have enrolled.

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## Question: What are the biggest challenges that households face when attempting to exit shelter with a CityFHEPS voucher?

While Robin Hood is aware that there are many problems with CityFHEPS, what remains unknown is exactly *which* barriers and pain points are the biggest drivers of low utilization rates and long stays in shelter. This PAE seeks to fill this gap by diagnosing and prioritizing the structural barriers and operational pain points in the CityFHEPS voucher administration process.

This PAE addresses the following research questions:

1. What does the CityFHEPS voucher administration process look like for shelter clients, including both families and single adults, that are trying to find permanent housing?
2. What are the structural barriers and the operational pain points that shelter clients, landlords, case managers, and other stakeholders face during the implementation of the CityFHEPS voucher administration process? Which of these barriers and pain points cause the biggest problems?
3. How can Robin Hood, through advocacy and grantmaking, best address these barriers and pain points to accelerate the rehousing process for people in NYC homeless shelters?

## Research Methods: Interviews with Key Stakeholders

To answer these questions, I primarily relied on interviews with CityFHEPS stakeholders. I validated and augmented findings from interviews with findings from the research literature, available data, and observations from social media activity.

### Summary of Interviews

I completed 42 interviews, including:

- 11 interviews with individuals who are currently or were previously experiencing homelessness, and who either are attempting or have had success finding permanent housing with a CityFHEPS voucher. Interviewees included both single adults and parents. Additionally, interviewees included individuals at different stages in the CityFHEPS process, including:
  - 6 individuals in a shelter who are currently navigating the CityFHEPS rehousing process
  - 5 individuals who were previously in shelters and now use CityFHEPS vouchers
  - 1 individual who is trying to get a CityFHEPS shopping letter<sup>i</sup>
- 9 interviews with homelessness advocacy and policy research organizations
- 8 interviews with homelessness service providers

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<sup>i</sup> Because this individual is relatively inexperienced with the CityFHEPS process, they were excluded from my analysis sample.

## *Introduction*

- 7 interviews with landlords and individuals in adjacent professions including:
  - 2 employees at large private-market housing providers
  - 1 small landlord
  - 1 broker who specializes in vouchers
  - 3 affordable housing providers
- 4 interviews with current or former case managers
- 3 interviews with NYC government employees

For a more detailed discussion of research methods, interview protocols, and sample representativeness, please see Appendix A.

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## Where to find additional information

- For background on CityFHEPS, including eligibility and voucher amounts, see Appendix B.
  - For background on NYC homelessness, the NYC shelter system, and recent improvements to CityFHEPS see Appendix C.
  - For background on the history of voucher programs in NYC, see Appendix D
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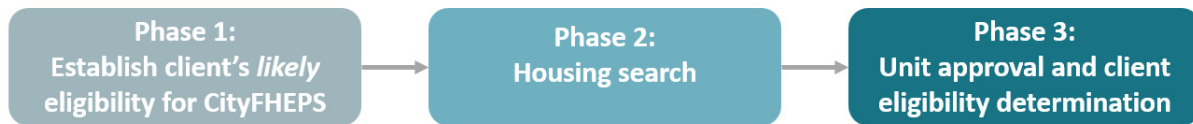
# Key Findings

Key Finding 1

## Key Finding 1: Accessing permanent housing with a CityFHEPS voucher requires overcoming many structural barriers and operational pain points

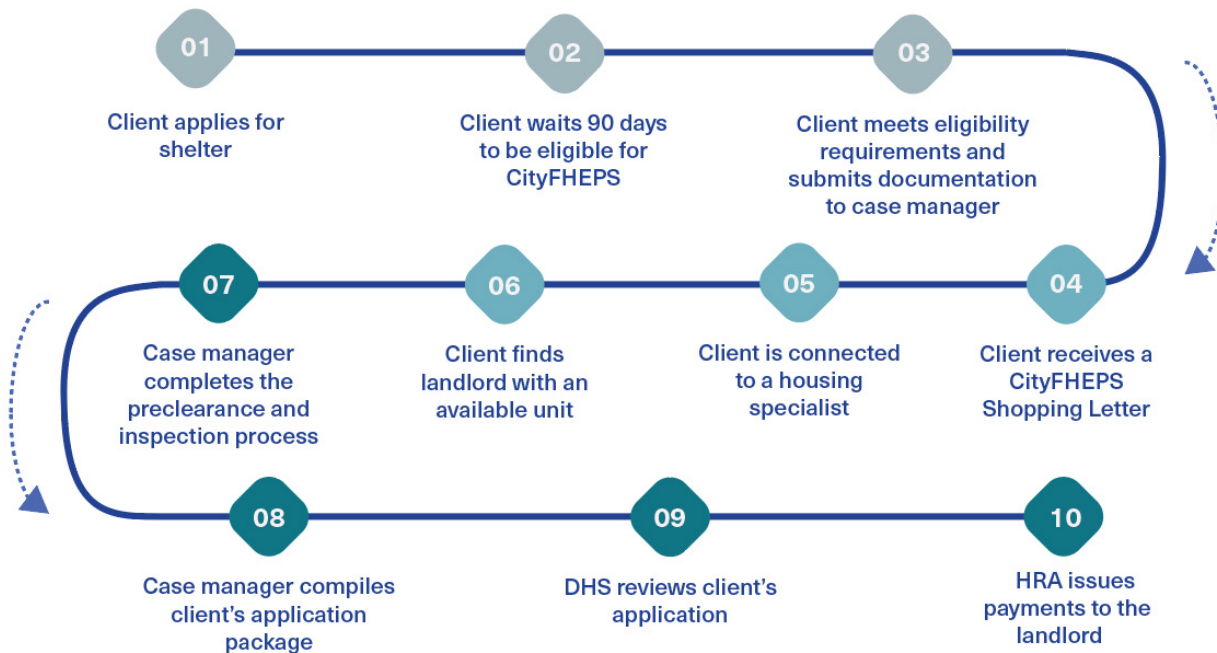
To secure permanent housing through CityFHEPS, clients must navigate a complex bureaucratic process. This involves three phases: (1) establishing the client’s likely eligibility, (2) searching for housing, and (3) obtaining unit approval and an official determination of client eligibility.

Figure 2: High-level overview of CityFHEPS Rehousing Process



Below, I break down the three phases into 10 steps, highlighting the structural barriers and operational pain points at each. **While high-quality data on the average time clients spend at each step is unavailable, currently, shelter clients typically spend 1 to 3 years in this process before exiting with a voucher.**<sup>11</sup>

Figure 3: Detailed overview of CityFHEPS Rehousing Process



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## Categorizing structural barriers and operational pain points

I categorize administrative burdens in the CityFHEPS process as either:

- **Structural barriers**, which are systemic issues stemming from the City's resource constraints
- **Operational pain points**, which are unintentional implementation issues that are relatively more fixable

To be clear, there is some overlap in this dichotomy. For example, many operational pain points arise in part due to staffing issues, which would be considered a structural barrier.

**LEGEND:** **Bolded term in purple: structural barrier**  
**Bolded term in blue: operational barrier**

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## Overview of the CityFHEPS Rehousing Process

### Step 1: Client applies for shelter

When entering shelter, households are required to **prove their homeless status**.<sup>ii</sup>

### Step 2: Client waits 90 days to be eligible for CityFHEPS

Clients must undergo a **mandatory 90-day waiting period** to become eligible for CityFHEPS. Though, some shelter clients explained that, in practice, the "90-day rule" is not always followed.<sup>iii</sup>

### Step 3: Client meets eligibility requirements and submits documentation to case manager

Next, the client **must meet and document other eligibility criteria**, including income and work requirements, as well as having an open Public Assistance case (see Appendix B for more information). Shelter clients explained several challenges associated with this step, including:

- Strict eligibility criteria: For example, a security guard earning \$25/hour would make too much to receive a voucher but would be unlikely to afford an apartment on their own.
- Document submission issues: **Case managers and DSS instructional guides do not provide clear instructions** about documentation requirements, leading to confusion, delays, and clients needing to submit documentation multiple times.

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<sup>ii</sup> Upon entering a shelter, a household is typically given a "conditional placement" and remains in conditional status for about 40 days (*before* the 90-day count starts).

<sup>iii</sup> For instance, one client reported receiving a CityFHEPS shopping letter after just six weeks.

## Key Finding 1

- Opening a Public Assistance case: Households must complete an interview with DSS staff to **open a Public Assistance (PA)** case. Due to staffing shortages at DSS, clients find it **challenging to schedule the PA interview**, and thus struggle to meet the PA requirement.

### Step 4: Client receives a CityFHEPS Shopping Letter

After the client's documentation is approved by the case manager, the client receives a CityFHEPS Shopping Letter. The Shopping Letter is a piece of paper that clients can show to landlords that explains the CityFHEPS program and that the client is *likely* eligible.

**Shopping Letter issuance** often poses challenges. For instance, some clients have reported having been issued shopping letters but not being informed by their case managers until several months later. A representative from a homelessness advocacy organization explained that some case managers do not know how to access shopping letters for clients in the DSS system.

### Step 5: Client is connected to a housing specialist

In theory, after obtaining a Shopping Letter, shelter clients receive housing search assistance from a dedicated housing specialist in their shelter. Per the City, almost all shelters have such specialists, though many positions remain unfilled.<sup>12</sup> In reality, however, most clients report receiving **inadequate support from housing specialists**. For instance, one client stated that:

*“The ‘housing specialist’ provides a list of 3 apartments to contact. These ‘apartments’ are all the first search hits from sites such as StreetEasy or hotpads.com. It is always essential to call those numbers as not doing so can be deemed non-compliance...However, those numbers were for automated systems, unverified units, and units that were non-existent.”*

Another individual, who previously spent several years in shelter, describes:

*“When you go into shelter, you hear this term called ‘housing specialist.’ That term excites you; you think you have someone who will help you with getting housing... I wound up doing all the work, and then the specialist co-signs it.”*

## 6. Client finds a landlord who is willing to accept their CityFHEPS voucher

With inadequate housing search assistance, shelter clients **must find an apartment on their own**.

Despite legal protections, voucher holders encounter **pervasive source-of-income discrimination** from landlords, resulting in a **difficult search process**. Clients find that the vast majority (~90%) of

## Key Finding 1

landlords that they reach out to either do not call them back (once they find out about the voucher) or simply tell them “sorry, I don’t work with ‘programs.’”<sup>13</sup>

One young mother who I interviewed shared her demoralizing experience of searching for a home while working full-time and caring for her newborn daughter. Endless phone calls typically resulted in a single apartment viewing, which often required an hour-plus subway ride with her baby. Typically, upon arriving at the viewing, she found herself among 10 other voucher holders in a similar situation. And after a crowded and chaotic five-minute viewing, she would hear no follow-up. Constant rejection from landlords made her feel like a failure and guilty for not being able to provide more for her child. Demoralized, she started to give up on her housing search.

## 7. Case manager completes the pre-clearance and inspection process

After the client finds a unit, the case manager initiates the **pre-clearance and inspection process**.

The preclearance process requires the case manager to get building deed and registration information from the landlord and send the information to DSS to check for any violations or ownership issues. While often no issues arise, sometimes the pre-clearance process can take weeks or longer, especially if (1) **the landlord does not have the documents readily available**, (2) **the case manager doesn't push the paperwork along**; or (3) if **DSS is unable to process the request quickly**. Additionally, **incorrect information in City databases** can create problems.<sup>iv</sup>

After pre-clearance, the unit undergoes an inspection. In general, the case manager performs the inspection walk-through. But if the unit is on the ground floor, an inspector from DSS must perform the inspection, **which can take weeks to schedule**. Clients also reported that **case managers frequently delay or cancel inspections**, frustrating both the landlord and the client.

**Inconsistently applied inspection standards** are another common issue. Some units fail for minor reasons, such as a missing bathroom curtain, while other units with clear health and safety issues, such as mold, pass inspection.

## 8. Case manager compiles client’s CityFHEPS Application package

After completing the pre-clearance and inspection processes, the case manager must **compile the client's CityFHEPS application** so DSS can determine the eligibility of both the unit and the client. This client eligibility determination helps ensure that the City can maximize reimbursements from State and federal funds (via State emergency assistance funds and TANF block grant).

**The CityFHEPS application consists of a cover sheet and 16 attachments** that need to be filled out by the client, case manager, broker, and landlord. The case manager is responsible for collecting

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<sup>iv</sup> One affordable housing developer recounted how a *new* construction unit failed pre-inspection due to a reported violation from 15 years ago.



## Key Finding 1

and ensuring accuracy across all components. However, several clients reported that their **case managers took months to complete their application**, which led them to risk losing their unit.

During interviews, case managers reported that the **16 documents are time-consuming to fill out, and expressed frustration about having to repeatedly fill in the same information**. For instance, the case manager needs to fill out the client's name, case number, landlord information, and the new address at least 10 times each, which makes the process tedious and time-consuming.

Another challenge for case managers is coordinating with other stakeholders, who also face burdens. For example, an experienced landlord said that it takes him 45 minutes to complete his paperwork, but that it could take much longer for someone less familiar. Some landlords also encounter problems with paperwork due to confusing CityFHEPS rules (e.g., **utility allowances**).

### 9. DHS reviews client's application

After the case manager compiles and submits the CityFHEPS application, the Department of Homeless Services (**DHS**) **Rehousing team reviews the package**. The DHS Rehousing team often finds issues with the application, prompting them to reach out to the case manager. DHS will also conduct a "**rent reasonableness test**" to help ensure that the City is not overpaying for the unit. According to advocates, this test can lead clients to narrowly miss out on apartments.<sup>14</sup>

Often, clients, case managers, and advocates complain about **applications being sent back to the case manager for nonsensical reasons**. For example, one advocate mentioned that a package was sent back because the case-worker wrote "LLCC" instead of "LLC" on one of the 16 attachments.

Typically, when the case manager returns the application, it will be reviewed by a new member of the DHS rehousing team who often identifies a new issue. **This back-and-forth process between DHS staff and the case manager** can happen several times, leading to significant delays, especially if either party misses or forgets to respond to an e-mail.

### 10. HRA issues payment to the landlord











Once approved, DHS sends the application package to the Human Resources Administration (HRA), who is responsible for issuing payment to the landlord. Often, this transfer of the package gets **delayed due to malfunctioning City technology systems**. In addition, the City's use of a **paper check system** can further delay the process.<sup>v</sup>

#### **Client can move in!**











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<sup>v</sup> According to the City, the processing of an application and issuance of payment across steps 9 and 10 typically takes DSS about 18 to 21 days. Interviews with *experienced* case managers confirmed this to be true. However, anecdotally, some advocates and shelter clients report the process taking much longer – up to 3-6 months. [See City Council, City of New York, "Transcript of the Minutes of the Committee on General Welfare, Wednesday, January 18, 2023."]

Key Finding 1

Summary of <b>CityFHEPS Structural Barriers</b> for Shelter Clients		
Step	Structural Barrier	City's Reason for Barrier <i>See Appendix C (pg. 63) for more info</i>
<b>PHASE 1: ESTABLISH LIKELY ELIGIBILITY</b>		
 1. Apply for shelter	Proving homelessness	Intentional targeting of scarce City resources; PA requirement allows the City to claim federal reimbursement (via TANF) for a portion of CityFHEPS costs
 2. Wait 90 days	Wait 90 days to demonstrate need	
 3. Meet eligibility requirements and submit documentation.	Proving and documenting eligibility; opening Public Assistance case	
<b>PHASE 2: HOUSING SEARCH</b>		
 4. Client receives CityFHEPS Shopping Letter	Case manager cannot easily find shopping letter in DSS system	Lack of resources to develop user-friendly IT systems
 5. Client connected to housing specialist	Inadequate housing search assistance	Challenge of recruiting and retaining high-performing housing specialists
 6. Client finds apartment	Source of income discrimination	City must rely on private actors to provide housing; difficult for City to address systemic racism and inadequate housing supply
	Lack of affordable housing	
<b>PHASE 3: UNIT REVIEW AND APPLICATION PROCESSING</b>		
 7. Case manager completes the pre-clearance and inspection process	Strict inspection and pre-clearance criteria	City wants to avoid paying landlords for substandard housing and reduce risk of fraud
 8. Case manager compiles client's CityFHEPS Application package.	Duplicative verification of client eligibility	Target scarce voucher resources; Eligibility requirements allow City to maximize federal and State reimbursements (TANF, emergency assistance from State)
	Case manager lacks capacity to quickly and accurately fill forms	Challenge of recruiting + retaining + hiring sufficient # of case managers
 9. DHS Rehousing Team reviews package.	Need to verify unit eligibility, including rent reasonableness	Targeting of scare resources
	DHS delays in processing forms	
 10. HRA issues payment to the landlord	Check can take weeks in mail	DSS staffing and technology constraints

Key Finding 1

Summary of <b>CityFHEPS Operational Pain Points</b> for Shelter Clients		
Step	Key Pain Point	Reason for Pain Point
<b>PHASE 1: ESTABLISH LIKELY ELIGIBILITY</b>		
 1. Apply for shelter		
 2. Wait 90 days		
 3. Meet eligibility requirements and submit documentation.	Case manager and client confusion over required documents	Shelter workforce issues; lack of materials with clear instructions
	Scheduling Public Assistance interview	DSS staffing constraints
<b>PHASE 2: HOUSING SEARCH</b>		
 4. Client receives CityFHEPS Shopping Letter	Case manager does not inform client about shopping letter	Shelter workforce issues – lack of training
 5. Client connected to housing specialist		
 6. Client finds apartment		
<b>PHASE 3: UNIT REVIEW AND APPLICATION PROCESSING</b>		
 7. Case manager completes the pre-clearance and inspection process	Case managers delay inspections	Shelter workforce issues – lack of staffing & training
	Inconsistent inspection criteria	
	Overly strict inspection criteria	Unclear (risk-aversion?)
	Difficulty Scheduling first floor inspections with DSS	DSS staffing constraints
 8. Case manager compiles client's CityFHEPS Application package.	Delays in compiling package	High demands on case manager
	Overly long application form	Unclear
 9. DHS Rehousing Team reviews package.	DHS returns forms with minor issues	Unclear
 10. HRA issues payment to the landlord		

## Takeaways: Key Finding 1

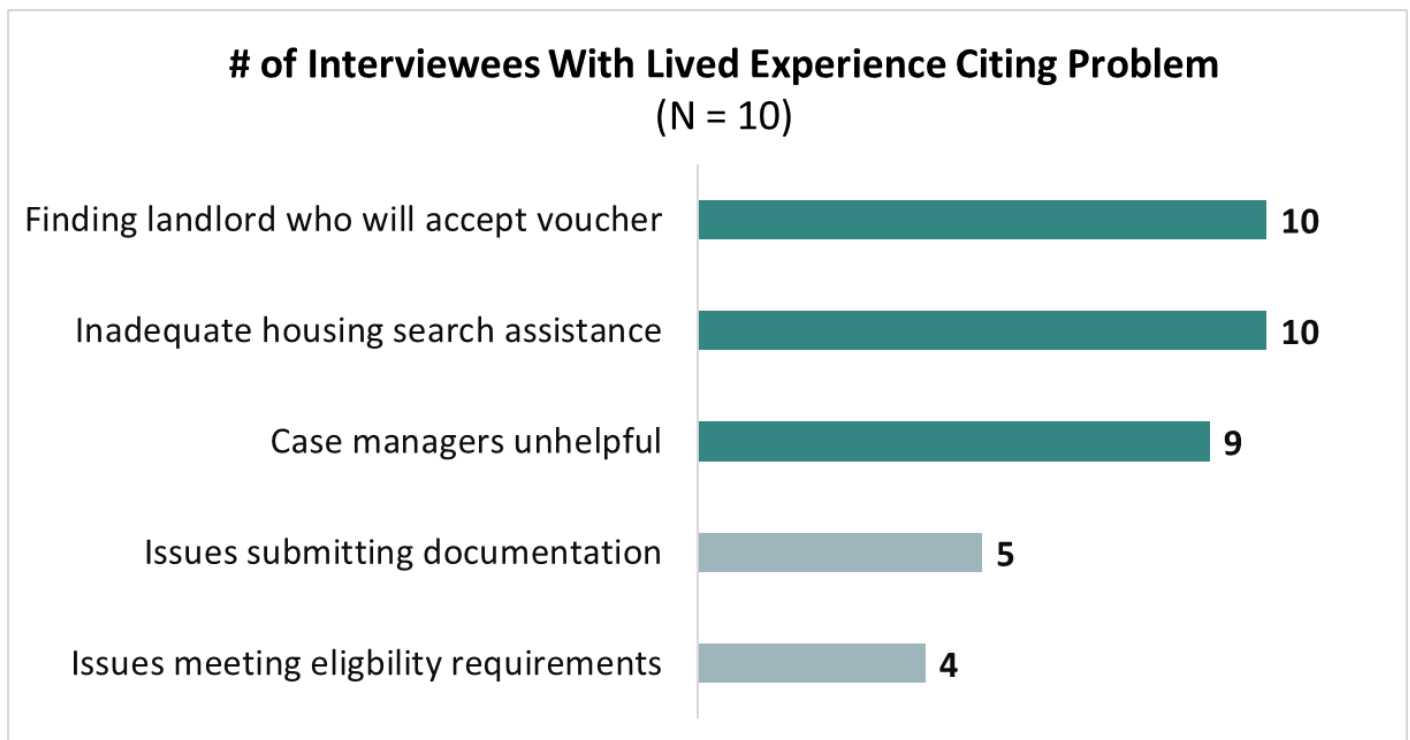
- Shelter clients face **structural barriers** throughout the CityFHEPS rehousing process
    - These barriers are difficult to overcome given **City constraints**
  - **Operational pain points** exacerbate the problems clients face due to structural barriers, especially in the third phase of the process: **unit review and application processing**.
    - Due to the combination of barriers and pain points, clients and landlords often **wait many months between the initial apartment viewing and client move-in**.
  - On average, it takes a household in shelter between 1 and 3 years to successfully navigate the lengthy CityFHEPS process.
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## Key Finding 2: The key barrier in the CityFHEPS rehousing process is finding a landlord who will accept the voucher

The City and its partners lack high-quality data that could help Robin Hood prioritize improvements in the CityFHEPS process (e.g., measures of attrition at each step). To fill this gap, I conducted qualitative interviews with ten individuals who have lived experience applying to CityFHEPS in shelter and made it at least through step six, which is trying to find an apartment.

During these interviews, the most commonly cited problem was **finding a landlord who accepts a voucher**, followed by the closely-related issues of **inadequate case management and housing search assistance**. While clients mentioned burdensome eligibility and documentation requirements, they emphasized that these issues pale in comparison to the challenges of finding a landlord who accepts CityFHEPS and navigating a complex voucher administration process with insufficient support from case managers or housing specialists.<sup>vi</sup>

*Figure 4: Interviewees Cited “Finding a Landlord” and “Inadequate Housing Search/Case Management Assistance” as Biggest Problem*



For example, one client explained that:

<sup>vi</sup> My sample consisted of households that were deemed likely eligible for CityFHEPS. If I had interviewed clients who were deemed ineligible, it's probable that eligibility and documentation issues would have been more apparent.

## Key Finding 2

*“The documentation, eligibility and getting a shopping letter is stressful and inconvenient, but not the worst thing. If you want something, you’re going to get it done. **Actually applying to apartments is the most de-moralizing part. It feels like everything is stacked against us.** Having the shopping letter actually feels worse than not having the shopping letter. When I was trying to get the shopping letter I had some hope about eventually getting it and finding an apartment. **But now there is little hope to finding an apartment.**”*

All other interviewees shared similar sentiments indicating that, by and large, clients get stuck at step six in the CityFHEPS process: finding a unit.<sup>vii</sup>

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## Takeaways: Key Finding 2

- The greatest challenge in the CityFHEPS rehousing process **is finding a landlord who is willing to accept the voucher**, followed closely by **inadequate case management and housing navigation services**

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<sup>vii</sup> Research from HUD’s Office of Policy Development and Research similarly finds that, nationally, Section 8 Housing Choice Voucher-holders experience significant challenges in the housing search process. See Mary Cunningham et al., *A pilot study of landlord acceptance of housing choice vouchers*, Washington, DC: US Department of Housing and Urban Development, Office of Policy Development and Research, 2018.

## Key Finding 3: Landlords' unwillingness to accept CityFHEPS stems from perceived issues with the program and negative stereotypes about voucher holders.

Every interviewee with lived experience expressed incredible difficulty in finding permanent housing with a CityFHEPS voucher due to the lack of landlords willing to accept it. This sentiment was echoed by landlords and property managers, who acknowledged that:

***“most landlords want nothing to do with the program.”***

As discussed in Appendix C, the difficulty in finding affordable housing is rooted in the broader issues of inadequate supply in NYC. Landlords' reluctance to accept CityFHEPS exacerbates this issue, further limiting affordable housing options for those who need them.

This key barrier raises an important and difficult question: why don't landlords want to accept CityFHEPS? I identify two key categories of barriers:

1. Perceived issues with the CityFHEPS program
2. Discrimination and bias against CityFHEPS voucher holders

### Landlord Issue 1: CityFHEPS' programmatic issues

Landlords cite four main issues with CityFHEPS as a program:

#### 1. Vacancy Costs for Landlords during CityFHEPS Application Processing

Landlords hesitate to accept CityFHEPS voucher holders as tenants to avoid losing money while their apartment sits vacant during the unit approval process. **The lengthy process of preclearance, inspection, application processing, and check mailing can force a landlord to keep a unit vacant for as long as 2-5 months, causing a financial loss.** In comparison, for private market tenants in NYC, the move-in process is typically extremely quick (i.e., less than a month).

#### 2. Concern that “the City will stop paying rent”

Landlords worry that "the City will just stop paying the rent."

While the City does not actively decide to “stop paying rent,” interruptions in rental payments do occur as a result of issues related to the Public Assistance (PA) requirement and CityFHEPS annual re-certifications. When CityFHEPS voucher holders use PA benefits to pay their portion of the rent, the landlord may stop receiving the tenant's portion of the rent if the tenant's PA case is interrupted. Likewise, if a CityFHEPS tenant does not re-certify their voucher on time, the City will stop paying the rent. Many CityFHEPS voucher holders find it challenging to recertify, explaining that the City can take up to six months to process a re-certification.<sup>15</sup>

### Key Finding 3

If these issues are not promptly resolved, landlords lose rental income and may need to evict their tenants, which can be a lengthy process in New York City. Landlords also perceive that eviction judges favor CityFHEPS voucher holders, though there is no evidence to support this claim.

Complaints related to rent payments, rent being paid on time, and public assistance issues are among the top issues reported by landlords on the website nycfheps.com (See Figure 5).

### 3. Lack of Clear Point of Contact At the City (“No one to call”)

Another common issue cited by landlords is the absence of a clear point of contact when CityFHEPS problems arise. Whether it's dealing with lengthy application processing times or missed rent payments, there's often no clear route for landlords to seek resolution. This can be frustrating and time-consuming, exacerbating existing CityFHEPS process challenges.

### 4. Mistrust of City

Another significant barrier to landlord participation in CityFHEPS is the widespread mistrust of City government. This mistrust has deep roots, largely stemming from the Bloomberg administration's abrupt funding cuts to the Advantage voucher program, which left thousands of landlords with non-paying tenants, and no choice but to evict them (see Appendix D). This cataclysmic event, combined with ongoing frustrations with the program, has fueled the perception that the City is not a trustworthy partner. As one landlord put it:

*“CityFHEPS will sometimes pay an incentive fee to get landlords to participate, but nobody trusts them. Nobody cares about incentives. The City is not trustworthy, so landlords don't want to work with them.”*

Quotes like this underscore how “easy-fixes” like landlord incentives are unlikely to repair deeply-rooted mistrust in City programs.<sup>16</sup>

## Landlord Issue 2: Discrimination against voucher holders

Landlords are often hesitant to rent to CityFHEPS voucher holders due to concerns about getting a “problem tenant” who is likely to damage the unit or cause other issues. To be clear, this bias does not appear to be grounded in empirics, but rather in systemic racism and the stigmatization of homelessness.<sup>17</sup> Every person I interviewed who went through the CityFHEPS process reported experiencing discrimination as a homeless person seeking housing. Clients report that:

*“One broker told me [as a person experiencing homelessness] that in the eyes of the landlord, I am at the bottom of the barrel. I respected that he told me the truth.”*

*“Landlords see me and think that I am going to trash the place, destroy it, lower its value”*

*“As a person experiencing homelessness, people do not look at you as a full human being”*



### Key Finding 3

During interviews, landlords expressed their concerns in terms of tenant heterogeneity; their worry was not that *all* CityFHEPS voucher holders are “problem tenants,” but that, with a CityFHEPS voucher holder you are *more likely* to get a “bad apple.” Additionally landlords expressed concerns that, if an issue does arise, they will have no one to call and the tenant will be difficult to evict. As a result, some landlords would prefer to leave their unit vacant, waiting to find another tenant besides a voucher holder. As one landlord explained:

*“For the vast majority of landlords, when they look at a prospective tenant there is always this fear: what do you do if you have a bad tenant? I’m better off leaving it vacant than having a bad apple... And we do worry that a voucher holder is more likely to be a bad apple. Unfortunately, this ends up being unfair for a good tenant with a voucher that’s looking for a decent apartment.”*

It is possible that landlords were not completely forthcoming about their discriminatory beliefs during interviews due to social desirability pressures, framing their concerns around heterogeneity rather than across-the-board discrimination.

### Key challenge: identifying biggest drivers of landlord unwillingness to participate in CityFHEPS

Understanding how to increase landlord participation in CityFHEPS requires untangling the relative importance of different concerns – particularly around whether landlords do not want to participate because of perceived *issues with the program* versus *issues with the tenants*.

Disentangling these two causes is difficult. In general, most advocates and policymakers tend to focus on the first reason: that landlords just do not like the program. The logic follows that if the program is improved, landlords will be willing to participate. While this may be true, the research for this PAE suggests that discrimination and bias is a real issue that is often overlooked. The implication is that interventions that focus on streamlining processes and improving the program for landlords need to be paired with measures to combat bias against voucher holders.

To be clear, available data does point to *issues with the program* being the biggest problem. For example, the analysis of landlord postings on [www.nycfheps.com](http://www.nycfheps.com) found that 86% of posts had something negative to say about the program, while 40% had something negative to say about the tenant (see Figure 6). But, in general, due to social desirability pressures, it is likely that complaints will be biased towards highlighting administrative problems. Additionally, due to the lack of representativeness, findings from [nycfheps.com](http://nycfheps.com) should be taken cautiously.<sup>viii</sup>

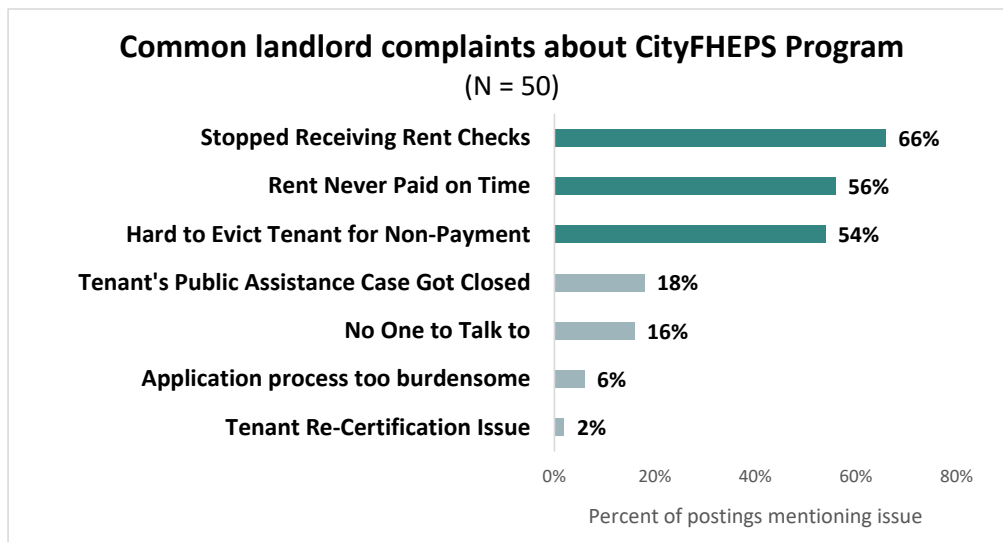
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<sup>viii</sup> Landlords sharing on this website are likely unrepresentative, though the direction of potential bias is unclear. On one hand, most posters actually accepted CityFHEPS tenants, which may suggest lower bias. On the other hand, someone who posts on a website like [nycfheps.com](http://nycfheps.com), which include very derogatory posts, may have increased biases.

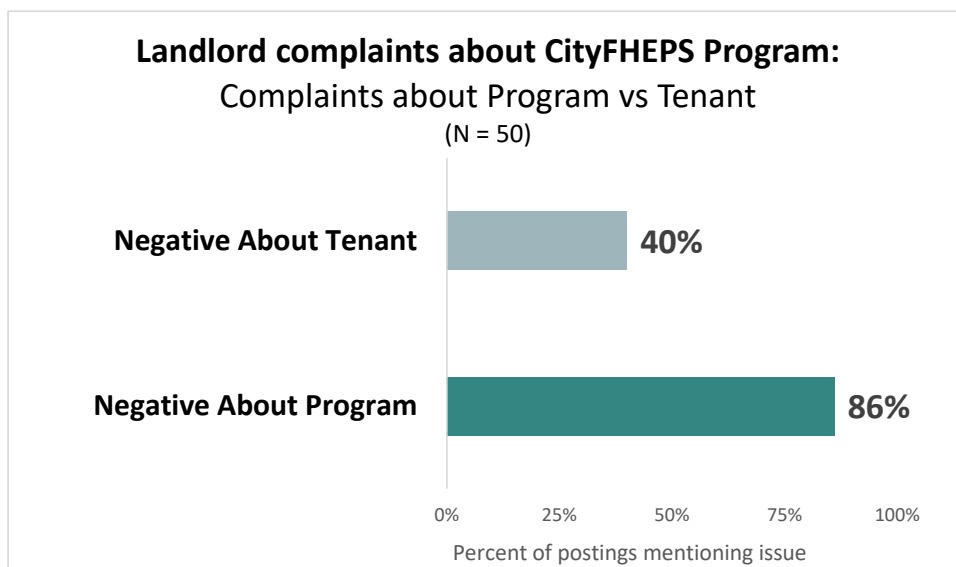
## Findings from nycfheps.com

Nycfheps.com is a website where New York City landlords detail their “horror stories” related to working with CityFHEPS and similar voucher programs. I performed a text analysis of 50 landlord complaints.

*Figure 5: Landlords cite issues related to missed and late rent payments as biggest issues with the program*



*Figure 6: The vast majority of landlords shared complaints about the program, while a smaller percentage shared complaints about tenants*



## Source of Income (SOI) protections have little teeth

Although discrimination against voucher holders is illegal in New York City, landlords continue to discriminate widely, largely without consequences, due to lack of enforcement and the difficulty of proving discrimination.

Over the past few years, the New York City Commission on Human Rights (CCHR), the agency responsible for enforcing source of income protections for all voucher holders in NYC, has had between zero and six staff devoted to enforcing these protections.<sup>18</sup> Additionally, there is currently no communication between awareness of SOI discrimination at DSS and enforcement at CCHR. Landlords know this, and acknowledge that it provides some piece of mind when they avoid CityFHEPS tenants. As one landlord said, *"I know those laws exist, but they're not enforced at all."*

Another issue is that proving discrimination can be difficult, especially in a tight rental market. For example, if a landlord receives dozens of applications for an apartment, it is difficult to make a case against them for not selecting a voucher holder. Additionally, landlords frequently screen tenants based on their credit score, eviction history, and criminal legal history, which can serve as a proxy for homelessness and poverty.

Finally, even some advocates acknowledged that, given the dysfunctionality of the existing CityFHEPS process, it is hard to hold it against landlords for wanting to avoid the program. Thus, for SOI protections to stick, the City must find a way to improve the process for landlords.

## Voucher holders often must resort to high-poverty neighborhoods

Despite many landlords being reluctant to participate in CityFHEPS, there are a number of landlords in high-poverty areas who actively seek out CityFHEPS voucher holders. This is because CityFHEPS vouchers are quite lucrative for landlords in these parts of the city. For instance, in parts of the central Bronx, the median asking rent for a one-bedroom is about \$1,700-\$1,800; CityFHEPS can pay up to \$2,301 (excluding most utilities), representing a premium of around 30%.<sup>19</sup>

An employee of a large property management company that primarily manages units in lower-income parts of the Bronx and East New York explained:

*"In these locations, no tenants can afford to pay the price, so we only take vouchers."*

During interviews, most CityFHEPS voucher holders who *did* find units explained that they could only do so by limiting their search to *"high poverty neighborhoods"*.

The trend towards placement in high-poverty areas is also evident in the CityFHEPS borough-level placement data, which shows that about 42% of voucher recipients move to the Bronx, the City's

### Key Finding 3

poorest borough, despite it representing only 15% of the City's overall rental stock.<sup>20,21</sup> Unfortunately, several experts expressed concerns that the saturation of vouchers in high-poverty submarkets has driven up rents for low-income residents who do not have vouchers. However, there is currently no publicly available data on CityFHEPS placements at the sub-borough level, limiting opportunities to identify empirical evidence to support this claim.<sup>ix</sup>

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### Takeaways: Key Finding 3

- Landlords cite the following concerns about CityFHEPS:
  - **high vacancy costs** during the lengthy unit approval and application process
  - that the **City will “stop paying rent”**
  - that there is **“no one to call”**
  - that the **City is untrustworthy**
- On the website nycfheps.com, the most common complaint is that **the City stopped making rent payments**
- Additionally, many landlords are hesitant to work with the program because they are concerned that a CityFHEPS voucher holder is more likely to be a **“problem tenant”**
- **Source of income (SOI) protections have little teeth** given the City’s lack of enforcement and the difficulty in proving discriminatory housing practices.
- Landlords in high-poverty areas are more likely to accept CityFHEPS vouchers given that the **program pays a substantial rent premium in low-income neighborhoods.**

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<sup>ix</sup> Evidence from interviews and social media suggests that landlords in lower-cost areas are intentionally overcharging the City. For example, in a CityFHEPS Facebook group, one individual remarked that: "Most realtors tell me that they will charge me exactly the price of the voucher for a one-bedroom apartment, which are \$2,387, but these apartments are valued lower. It could be an apartment for \$1,800." While rent reasonableness tests are intended to prevent such overpayments, it seems that they do not always achieve this goal in practice.

## Key Finding 4: Overburdened case managers and housing specialists exacerbate process barriers and pain points

As highlighted in the previous Key Findings, shelter clients interviewed for this PAE expressed deep frustration with the quality of case management and housing specialist services provided in shelters. But, to be clear: this analysis does not aim to generalize the performance or capabilities of all case managers and housing specialists. From my discussions with brokers and landlords, I've learned that the quality of case management and housing search services can vary greatly. In addition, I had the pleasure of interviewing four case managers who are extremely knowledgeable.

It is possible that shelter clients who were interviewed for this PAE may have experienced more frustrating situations with shelter staff relative to the average person in a homeless shelter. But even if this is true, I believe their experiences are still worth highlighting because they reflect the challenges faced by individuals who may be struggling the most within the shelter system.

### Summary of clients' issues with case managers and housing specialists

To summarize and augment previous discussions, clients typically mentioned the following complaints with their case managers and housing specialists:

- **Failure to fulfil responsibilities in driving CityFHEPS process forward**
  - Case managers will not inform clients when they are issued a Shopping Letter
  - Case managers will delay or fail to attend unit inspections
  - Case managers will be slow to compile a client's CityFHEPS application package
  - Case managers will be slow to follow-up with the DHS rehousing team when there is an issue in an application
  - Housing specialists offer no or extremely low-quality housing navigation support
- **High turnover:** Clients reported constantly getting new case managers due to high turnover
- **Lack of empathy:** Several clients expressed feeling that case managers simply *"did not care about me at all"*
- **Lack of process knowledge:** Clients frequently complained that case managers *"do not know how to do anything"*
- **Burnout:** Clients complained their case managers and housing specialist were simply burnt out and lacked the bandwidth to respond to each of their client's needs.

### Possible root causes of workforce challenges in shelters

I identify three likely drivers of workforce challenges for case managers and housing specialists:

## 1. Excessively high caseloads and job demands

While exact caseload data is not available, interviewees consistently report that case managers and housing specialists are overburdened by high caseloads and are thus unable to meet individual client needs. According to one advocate, given current vacancies in DHS shelters, case managers typically have between 70-80 clients, while housing specialists have caseloads of 120-130 clients. For context, one case manager stated that a reasonable workload would be around 20-30 clients.

High caseloads are not the only challenge faced by case managers and housing specialists; they must also work in-person five days a week, serving highly vulnerable populations in a very stressful shelter environment. One employee at a shelter provider informed me that it's not uncommon to see case managers quit after a single day on the job.

## 2. Insufficient pay

Case managers and housing specialists are paid so little that they are quite vulnerable and often housing insecure themselves. Given current DHS shelter contracts, these positions typically start at a salary of around \$40,000.<sup>22</sup> Many case managers are also supporting children on this salary.

One case manager informed me that the running joke among case managers is asking *"how do I get one of these vouchers?"* For context, a CityFHEPS voucher for a one-person household covers about \$2,400 in rent (including utilities), which is nearly 70% of a case manager's pre-tax income. Unfortunately, these professionals are experiencing the stress of poverty and housing instability firsthand, which can negatively impact their ability to serve their clients effectively.<sup>23</sup> Additionally, understandably, case managers might experience frustration when helping clients secure apartments that they themselves could not come close to affording.

Such a low pay standard makes it difficult for shelters to recruit and retain frontline shelter staff, contributing to high vacancy and turnover rates. While comprehensive data is not available, one NYC shelter provider reported a vacancy rate of 32%, while another shelter provider reported an attrition rate above 50%.<sup>24</sup>

## 3. Insufficient training and resources

Despite the significant responsibilities placed on case managers and housing specialists, many of them receive insufficient training and resources to effectively perform their duties.

For example, one interviewee explained that housing specialists receive little to no formal guidance on how to find units or connect with landlords, and are expected to independently "hustle" to figure it out themselves. Likewise, during a City Council testimony in January 2023, Acting DSS Commissioner Molly Park explained that DHS offered a singular training opportunity for case managers over the summer – which was framed as an achievement for the agency,

underscoring the low standard.<sup>25</sup> Additionally, shelter clients repeatedly told me that their case manager simply did not know how the CityFHEPS program works.

## **Key issue: CityFHEPS process breaks down when overburdened case managers are unable to fulfill job responsibilities**

The CityFHEPS rehousing process requires case managers to take action to move the process forward at nearly every step. When case managers are unable to fulfill their job responsibilities, this process quickly breaks down. Notably, unlike most other social benefits programs, where clients can submit applications, respond to follow-ups, and so on, the CityFHEPS process does not provide shelter clients many opportunities to drive the process forward themselves.

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### **Takeaways: Key Finding 4**

- Across the board, interviewees with lived experience complained about the **case management and housing navigation services** they received
  - Workforce issues in shelters are likely driven by a combination of :
    - **High caseloads and job demands**
    - **Low pay**
    - **Lack of training and inadequate resources**
  - **When case managers are unable to fulfill job responsibilities, the CityFHEPS rehousing process breaks down, leading to prolonged stays in shelter**
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# Recommendations for Robin Hood



## Overview of recommendations:

To address the operational pain points and structural barriers outlined in the previous chapter, this PAE recommends that Robin Hood pursue a four-pronged strategy:

- **Recommendation 1: Advocate for Easy Fixes:** Advocate for the City to adopt low-cost improvements to program operations that can help tackle both landlord concerns and workforce-related issues.
- **Recommendation 2: Test Interventions to Address Deeper Barriers:** Partner with the City and shelter providers to pilot evidence-based interventions that seek to boost landlord participation and address workforce challenges at shelters. Critically, these interventions can generate information to inform solutions to structural problems in the longer-term.
- **Recommendation 3: Broaden the Coalition to improve CityFHEPS:** Broaden Robin Hood's advocacy coalition to include landlords, brokers, and other housing professionals involved in administering or accepting CityFHEPS vouchers. This can help raise political pressure on the Mayor to prioritize resolving problems with CityFHEPS.
- **Recommendation 4: Pursue Other Channels to Increase Affordable Housing Supply:** Advocate for creative policies at the local, state, and federal levels to expand the affordable housing supply in New York City.

These recommendations were selected based on the following criteria: feasibility; potential for impact; and relevance of opportunity given Robin Hood's position and resources.

By implementing these recommendations, Robin Hood and the City can expedite the CityFHEPS rehousing process by addressing operational pain points in the near term and collecting data to inform solutions to tackle deeper barriers in the longer term. Additionally, the fourth strategy acknowledges the limitations of improving CityFHEPS without addressing the lack of housing supply in New York City. Therefore, this PAE also proposes several approaches for Robin Hood to advocate for innovative policies that can help alleviate housing supply constraints.

Finally, it is important to note that, as discussed in Appendix C, the City is already undertaking efforts to improve and innovate CityFHEPS, such as updating its internal technology systems for processing applications and paying landlords. Due to the ongoing nature of these efforts and the fact that they primarily concern internal City processes, they were not specifically highlighted in the recommendations for Robin Hood. Nonetheless, I urge Robin Hood to continue to ensure accountability in these areas.

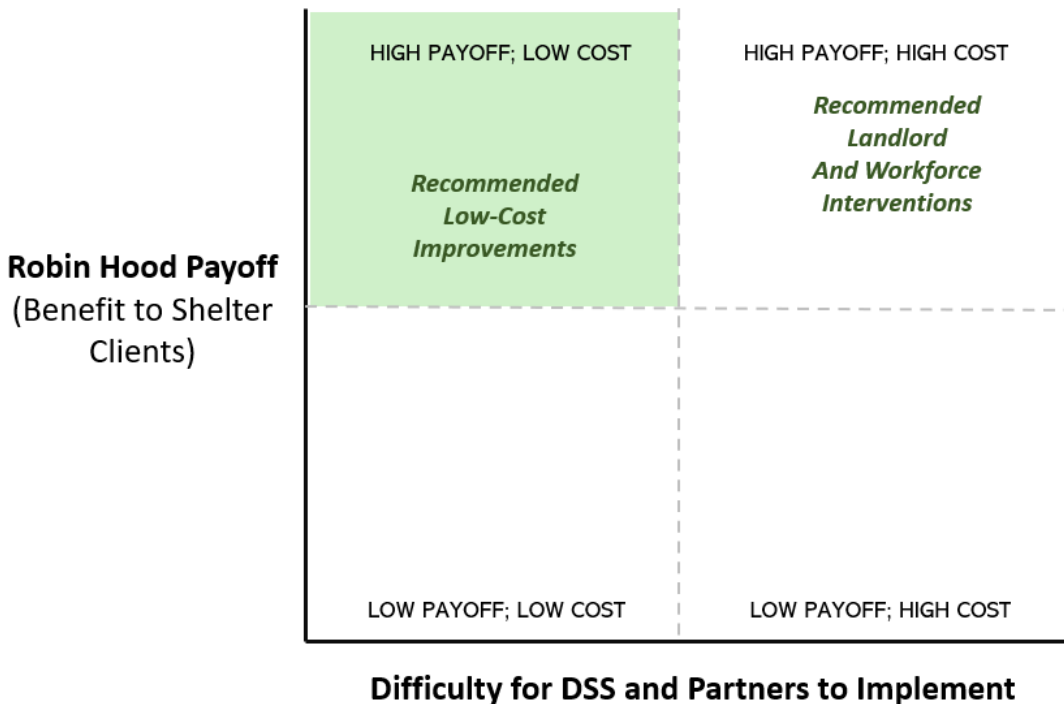
## Recommendation 1: Advocate for Easy Fixes

Advocate for the City to implement low-cost improvements to increase landlord interest in the program and address case manager job demands.

### Overarching Rationale

This PAE seeks to provide Robin Hood with advocacy recommendations that are *feasible* given the City's significant budgetary, technological, and political constraints (see Appendix C for more). To achieve this, Recommendation 1 focuses on addressing the "operational pain points" highlighted in Key Finding 1 by implementing low-cost and high-impact operational reforms. These relatively quick and low-cost fixes can benefit shelter clients by accelerating the rehousing process, without placing a considerable burden on DSS or its partners, falling within the high payoff, low cost portion of the matrix below.

Figure 7: "Easy Fixes" Capture the Low Cost, High Payoff Policy Option for DSS



## Low-cost improvement #1: Cut unnecessary red tape in the inspection process

Inspection requirements for CityFHEPS delay the rehousing process, increasing landlord frustration with the program and resulting in shelter clients missing out on viable apartments. There are several low-cost steps the City could take today to minimize administrative hurdles:

- Exempt newly constructed units, that have already been inspected by the Department of Buildings, from CityFHEPS inspection requirements.
- Allow landlords with multiple units (on a single property) to have all of those units inspected at once (i.e., pre-inspection), and for the inspection status to remain active for at least 1 year.
  - This rule would be particularly helpful for affordable housing providers who frequently rent to voucher holders.
- Provide an option for CityFHEPS applicants to self-inspect units if the case manager has not completed the inspection within a set time frame (e.g., 1 week).
  - *Rationale:* Shelter clients frequently complained that case managers would cancel or not show up to inspections, leading them to miss out on potentially viable apartments.
  - *Risks:* One concern with this proposal is that shelter clients may not be well-equipped to properly conduct an inspection, or may have an incentive to pass units that ought to fail. However, my research suggests that these issues already occur given the status quo of (often inexperienced) case managers performing inspections. Moreover, this risk could be mitigated by requiring applicants to film or photograph the inspection.
- Waive the requirement for DSS to provide inspections for first-floor units if the inspection cannot be scheduled within a reasonable time frame (e.g., 1 week).
  - *Rationale:* Landlords frequently complained about difficulties when scheduling inspections with DSS for first-floor units.
- Remove unnecessary inspection requirements, especially for easily fixable problems.
  - E.g., if the gas has been turned off since the last tenant moved out, the unit will fail.<sup>x, 26</sup>
- Allow well-established homelessness service organizations to run preclearance checks, inspect units, compile CityFHEPS applications, and process CityFHEPS re-certifications.
  - *Rationale:* This can help reduce job demands for overburdened case managers. During interviews, advocacy organizations expressed an interest in carrying out these types of activities.

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<sup>x</sup> To avoid this issue, it is not uncommon for shelter clients to try to open utilities accounts at apartments before they have even applied.

## Low-cost improvement #2: Streamline CityFHEPS application forms

The CityFHEPS application forms require that case managers fill out a cover sheet and submit 16 related attachments, compiling a package that is 50-60 pages long. Across the 16 attachments, the same information is asked over and over again. For instance, the case manager needs to fill out the client's name, case number, landlord name and contact information, and new address at least 10 times each, which makes the process tedious and time-consuming. To address this problem, the City should:

- Synthesize the existing CityFHEPS cover letter and 16 attached forms into a single streamlined document that only requires the case manager to enter information like the client name, new address, and landlord information once.<sup>xi</sup>
  - In an ideal world, both client and landlord application information could be automatically used across multiple applications, further streamlining the process. However, technology and legal constraints might prevent this from being an “easy” fix.

Likewise, another key issue is that upon receipt of the CityFHEPS application package from the case manager, the DHS-rehousing team will frequently send back the package due to minor errors, leading to time-consuming back and forth between the overburdened shelter staff and DSS. To address this problem, the City can:

- Allow DHS re-housing team to accept or correct minor errors in the CityFHEPS application form.

Finally, at both the initial and final eligibility determinations, shelter clients complained that it was unclear what documents they needed to provide. To address this problem, the City should:

- Create a simple “documentation checklist” to clarify eligibility documentation requirements for both shelter clients and case managers

## Low-cost improvement #3: Increase enforcement of source of income protections

Currently, there is little to no enforcement of source of income protections for voucher holders. While there are likely to be limits on how much source of income enforcement can improve

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<sup>xi</sup> This recommendation is broadly supported by the growing literature around administrative burden, which shows that excessively long application forms impose compliance costs onto potential program recipients and can thus reduce participation in social safety net programs. See Pamela Herd and Donald P. Moynihan, *Administrative burden: Policymaking by other means*, Russell Sage Foundation, 2019.

landlord participation, the City could take low-cost steps to make clear that source of income discrimination is actually taken seriously:<sup>xii</sup>

- Open lines of communication between awareness of source of income discrimination at DSS and enforcement at the City Commission on Human Rights (CCHR).
- In public communications (e.g., Mayoral announcements) emphasize the potential for legal ramifications for landlords who discriminate against voucher holders (e.g., by highlighting a recent ruling against the Parkchester Preservation Company).<sup>27</sup>

## Low-cost improvement #4 Reduce frequency of CityFHEPS recertification requirements to 18 months

- The City should reduce the frequency of CityFHEPS annual recertification requirements to at least 18 months, particularly while there are insufficient staff at DSS to process recertifications.<sup>xiii</sup>
  - Landlords' top complaint with CityFHEPS is that the City will stop paying the rent. Interruptions of rental payments often occur when a tenant's recertification does not go through in a timely manner.

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## Summary of Recommendation 1: Advocate for Easy Fixes

Robin Hood should advocate for the City to take steps to implement the following **low-cost, high-impact program improvements**:

1. **Cut unnecessary red tape** in the preclearance and inspection process
2. **Streamline CityFHEPS application forms**
3. **Increase enforcement of source of income protections**
4. **Reduce frequency of CityFHEPS recertification requirements to 18 months**

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<sup>xii</sup> Currently, there is some evidence that source of income discrimination laws help families access low-poverty neighborhoods, though the strength and clarity of the evidence is mixed. See: Daniel Teles and Yipeng Su, "Source of Income Protections and Access to Low-Poverty Neighborhoods," *Urban Institute*, October 18, 2022, accessed April 1, 2023. <https://www.urban.org/research/publication/source-income-protections-and-access-low-poverty-neighborhoods>.

<sup>xiii</sup> Empirical research suggests that lengthening recertification periods can help lower the costs of participating in social safety net programs and thus increase program uptake. See Peter Ganong and Jeffrey B. Liebman, "The decline, rebound, and further rise in SNAP enrollment: Disentangling business cycle fluctuations and policy changes," *American Economic Journal: Economic Policy* 10, no. 4 (2018): 153-76, pg. 158.

## Recommendation 2: Test Interventions to Address Deeper Barriers

Partner with the City and shelter providers to pilot evidence-based interventions that seek to boost landlord participation and address workforce challenges at shelters

### Overarching Rationale

By contributing philanthropic funding and programmatic expertise, Robin Hood can empower the City and its contracted shelter providers to test new ways to address structural barriers in the CityFHEPS rehousing process. Without funding from an organization like Robin Hood, the City lacks the resources and flexibility to drive improvements in CityFHEPS at an acceptable pace.

The pilots proposed below will help the City and Robin Hood identify effective solutions to address complex barriers related to landlords' lack of participation and low-performance among case managers and housing specialists. While this PAE outlines likely drivers of these issues, the relative importance of different drivers remains unknown.<sup>xiv</sup> By conducting targeted interventions to test different hypotheses, Robin Hood can assist the City in gaining a more complete understanding of the underlying problems. Moreover, these pilot programs can help generate proof-of-concepts that could be scaled Citywide. During interviews, employees at both Robin Hood and City agencies expressed interest in the recommended partnership.

The purpose of this recommendation is to highlight the opportunity for Robin Hood and the City to collaboratively test solutions for improving the CityFHEPS re-housing process, and to present a variety of potential interventions to consider. For practical and evaluation purposes, I do not recommend implementing every proposed intervention at once. Rather, by providing multiple evidence-based options, I aim to inspire ideas and showcase the range of opportunities available. For further guidance on evaluation, please refer to Appendix G.

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<sup>xiv</sup> Nationally, there is relatively little high-quality empirical research showing the effectiveness of interventions that seek to boost landlord participation in the Section 8 Housing Choice Voucher Program. There is even less research on interventions to boost landlord participation in CityFHEPS or other locally-funded programs. Likewise, there is limited evidence on effective workforce interventions in homeless shelters, though there is some relevant evidence in other contexts, which I draw from in my recommendations. While this lack of research makes it difficult to endorse evidence-based interventions, it represents an important opportunity for Robin Hood to bring clarity and evidence to this problem.

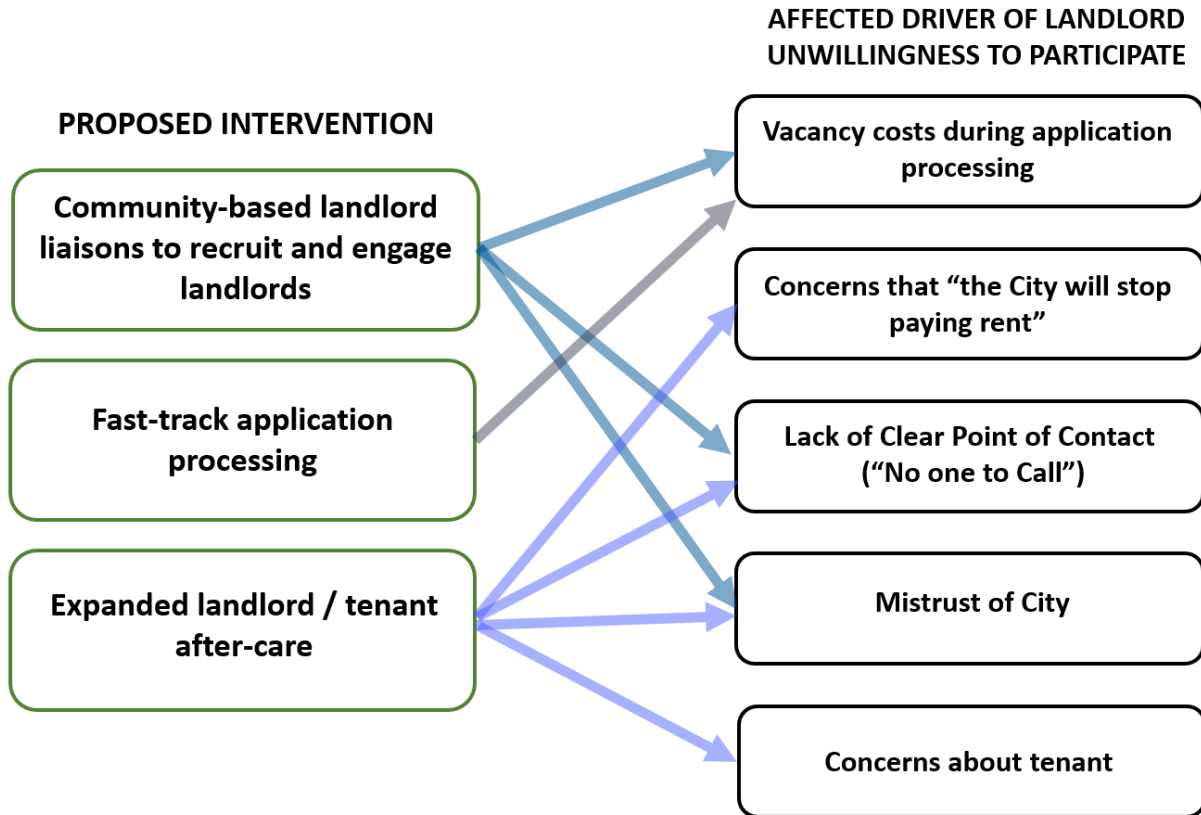
## Landlord-focused interventions

Robin Hood, in partnership with the City, shelter providers, and community-based organizations, should consider testing the following interventions:

- Landlord Intervention 1: **Hire dedicated landlord liaisons** to recruit landlords to participate in CityFHEPS, with a focus on neighborhoods that are currently less saturated with vouchers.
- Landlord Intervention 2: Create a **fast-track option** for CityFHEPS application processing.
- Landlord Intervention 3: Offer **expanded tenant aftercare**, including expanded landlord assurance funds and landlord-tenant mediation services.

Collectively, these interventions help address the key drivers of landlord unwillingness to participate, as outlined in the previous chapter.

*Figure 8: Proposed Landlord Interventions Address Barriers Identified in Key Finding 3*



## Landlord-focused Intervention #1: Hiring dedicated landlord liaisons to recruit landlords

### Intervention Description

The City should partner with community-based organizations (CBOs) to hire landlord liaisons who are solely responsible for recruiting landlords to participate in CityFHEPS. These landlord liaisons would be funded and supported by Robin Hood, and unlike current housing specialists, they would be community-based and dedicated to building relationships with landlords. The landlord liaison would be responsible for:

- Identifying landlords who do not currently accept CityFHEPS, educating them about the program, and encouraging them to rent vacant units to voucher holders.
- Providing a designated point of contact for landlords throughout the unit approval and application process.
- Building trusted ongoing relationships with landlords.
- Offering incentives, such as unit-hold fees, to encourage landlords to participate in CityFHEPS and mitigate concerns around vacancy losses.<sup>xv</sup>

Several CBOs have had success with a similar approach during the rollout of the Emergency Housing Vouchers (see Mini Case Study in Appendix E for more information). The success of this intervention in the EHV context suggests that this would be a promising model to scale and expand to CityFHEPS.

### Neighborhood Targeting

Landlord liaisons should prioritize identifying units in neighborhoods that are affordable given CityFHEPS voucher amounts but where there is not currently an over-saturation of voucher holders. This approach will help to:

- Place households in relatively higher-opportunity areas, which can improve children's longer-term outcomes.<sup>28</sup>
- Broaden the pool of participating landlords.<sup>29</sup>
- Mitigate potential displacement effects.<sup>xvi</sup>
- Reduce potential rent pressures arising from voucher over-saturation in high-poverty neighborhoods.

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<sup>xv</sup> The City does currently offer some landlords a 1-month unit hold payment in the event of an application delay; However, given that application processing delays can last 3-4 months, Robin Hood should consider funding an expanded incentive.

<sup>xvi</sup> Given NYC's tight rental market, a reasonable concern is that helping a vulnerable household find an apartment will just prevent another vulnerable household from moving into that unit. In other words, the individual-level benefits of housing search assistance would be negated by displacement effects in the aggregate. Targeting relatively higher-opportunity areas where vulnerable households are less likely to move can mitigate this concern.



Recommendation 2

**Key Risks in Implementing Landlord Liaison Model for CityFHEPS**

<b>Key Risk</b>	<b>Mitigation Strategy</b>
1. Difficulty hiring and retaining high-performing landlord liaisons	Offer competitive pay. For example, Stonewall CDC pays navigators \$65,000 and has encountered far relatively few staffing challenges (See Appendix E).
2. Offering unit-hold payments may reduce pressure on City to improve processes	Set clear goal for when unit-hold payments get phased out, making clear that the City should work to implement process improvements while Robin Hood and partners temporarily fill gaps.

## Landlord-focused Intervention #2: Create fast-track option for application processing

### Proposed intervention

The City, with funding support from Robin Hood, could offer a fast-track option to accelerate application processing for select clients and help reduce landlord frustration over delays in the CityFHEPS process.

There are two promising ways to implement the fast-track option, which can ideally be used together. The first mechanism is to create a prioritized queue with dedicated DHS/HRA staff, who ideally would be physically present at the shelter.<sup>xvii</sup> The second mechanism is to temporarily waive components of the eligibility verification (e.g., using self-attestation) and allow that step to be completed once the client is moved in.

As discussed in Key Findings, the current application processing takes a long time because several factors have to be verified, including the landlord's identity and the client's eligibility. To mitigate these delays, the City could grant presumptive eligibility to shelter clients. Given that shelter clients undergo relevant eligibility screening when they enter shelter and receive a CityFHEPS shopping letter, there is a relatively small risk that clients will be found ineligible (or unable to meet eligibility criteria). In cases where clients are found ineligible, Robin Hood could reimburse the City for any additional expenses incurred. Additionally, the City should also consider granting presumptive eligibility to landlords with a history of renting to CityFHEPS voucher holders.

### Key Risks

Key Risk	Mitigation Strategy
1. Presumptive eligibility may result in clients being later found ineligible, leading to displacement and negative outcomes for both the client and landlord.	The pilot program should closely monitor the frequency of such cases and adjust or terminate the program if it proves to be a significant issue.
2. Too many applications get sent to the DHS/HRA prioritized queue, defeating the purpose of the “fast track.”	The program should establish clear criteria to determine which applications are eligible for fast-tracking. Criteria could be based on unit location, shelter length of stay, and other client characteristics (e.g., disability status.)
3. “Fast track” option seen as “unfair” for clients who do not get to use it	
4. “Fast track” clients delay application processing for non-“fast-track” clients	Dedicated DHS/HRA staff for prioritized queue should come from additional hires (with support from Robin Hood)

<sup>xvii</sup> A case manager who worked at Homebase (a homelessness prevention services provider) mentioned that bringing an HRA employee onsite allowed them to address paperwork issues much more quickly.

## Landlord-focused Intervention #3: Offer expanded tenant aftercare

### Need for Intervention

In interviews with Stonewall CDC and Enterprise Community Partners, key implementers of the landlord liaison model for EHV, a recurring theme emerged: while the program was successful in attracting new landlords, tenants and landlords have since faced challenges due to the lack of after-care support services after move-in (See Appendix E). Similarly, during interviews, landlords expressed frustrations about the absence of a point of contact to help resolve post-move-in issues (e.g., missed rental payment)s. Finally, several CityFHEPS voucher holders reported problems with their units but found it difficult to navigate the unit-transferring process. All of these factors indicated a need for expanded aftercare support for both tenants and landlords.

### Proposed Intervention

Robin Hood should consider funding a pilot for the City to work with CBOs to hire tenant after-care coordinators to work with both landlords and tenants. The proposed intervention includes:

- A community point person for every tenant/landlord match who could serve as a clear point of contact for either party to reach when issues arise. This point person would be hired by CBOs, and would be trained to mediate disputes and provide resources to tenants and landlords.
- Expanded landlord assurance funds, which could provide financial support to landlords in the event of tenant-related issues. These funds could be used to cover rent arrears or other costs associated with addressing tenant-related issues.<sup>xviii</sup>
- Stronger pathways to re-housing for sub-optimal tenant/landlord matches. This could involve working with landlord liaisons to identify alternative housing options for tenants.

### Key Risks

Key Risk	Mitigation Strategy
1. Existence of after-care services perpetuates negative misconceptions about program and tenants	The messaging around after-care services should be carefully crafted to emphasize its benefits to landlords without perpetuating negative misconceptions about CityFHEPS or voucher holders.

<sup>xviii</sup> The City currently offers landlords Special Supplemental Assistance Funds of up to \$3,000 to deal with potential expenses related to missed payments or unit damage. During interviews, landlords expressed concerns that in many conceivable situations, \$3,000 would be insufficient to cover months of missed rent or significant unit damage.

## Case manager and housing specialist-focused interventions

### Overarching Rationale

In Key Finding 4, I identified three key factors of performance issues among case managers and housing specialists: (1) high job demands, (2) low pay, and (3) insufficient training and resources. These challenges have made it increasingly difficult for shelters to attract and retain skilled staff, resulting in a cycle of burnout and turnover that leaves many clients with case managers and housing specialists who are ill-equipped to drive the CityFHEPS rehousing process forward.

However, while these underlying problems are well-known, there is uncertainty as to which interventions will be effective in addressing them. This presents an exciting opportunity for Robin Hood to collaborate with the City to identify effective interventions to empower and improve the performance of shelter staff, with the hope that these improvements can also have positive downstream impacts on shelter clients. Investments in case managers and housing specialists are particularly promising given recent evidence demonstrating that high-quality housing search assistance is a key tool to help families move to high opportunity neighborhoods.<sup>30</sup>

Although the City has expressed interest in exploring these investments, it has so far lacked the necessary evidence and resources to implement them.

### Promising Interventions

Robin Hood, in partnership with the City and select shelter providers, should consider testing the following evidence-based interventions targeted at housing specialists and case managers:

#### Lighter-touch solutions:

1. Anti-burnout interventions
2. Launch a Training Academy

#### More complex solutions:

3. Reduce case manager job demands by making application process more client-driven
4. Incorporate pay-for-performance bonuses for both shelter providers and frontline staff
5. Increase pay
6. Increase staffing ratios

## Overview of Promising Workforce Interventions

### Proposed intervention 1: Anti-Burnout Resources

Robin Hood has the opportunity to fund evidence-based interventions aimed at combatting burnout among shelter staff. Interventions include:

- **Social support groups**: In-person or online social support groups for frontline staff have been shown to reduce burnout and turnover. For instance, a 6-week intervention that allowed 911 dispatchers to asynchronously share challenges and advice with their peers significantly reduced burnout and cut turnover by over half.<sup>31</sup>
- **Relaxation exercises**: Teaching mindfulness techniques and relaxation exercises to frontline staff has been shown to reduce signs of burnout.<sup>32</sup>

### Proposed intervention 2: Launch a Training Academy

To address client complaints about case managers and housing specialists lacking CityFHEPS process knowledge and empathy, it may be beneficial to establish a Case Manager/Housing Specialist Training Academy. Evidence suggests that increasing training for frontline staff can improve performance.<sup>33</sup>

The Training Academy could focus on improving staff's skills working with vulnerable populations, providing tactical resources for improving job performance, and fostering empathy. Establishing a training academy could also improve employee morale and create a greater sense of community among shelter staff. During interviews, case managers expressed a desire for more structured training and resources, and a City employee reported that previous training sessions for Homebase employees were highly valued by social services staff.<sup>xix</sup> An experienced community-based organization like Enterprise Community Partners could help implement the proposed training academy.

### Proposed intervention 3: Reducing case manager job demands by making the application process more client-driven.

Currently, the CityFHEPS application process is structured in such a way that shelter clients are reliant on case managers to press a button or send an email at every step of the process. This places an excessive workload on case managers who are already overburdened with

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<sup>xix</sup> Homebase provides homelessness prevention services to clients “in community.”

## *Recommendation 2*

responsibilities. As a result, the overall CityFHEPS rehousing process is highly vulnerable to breaking down due to understandable human errors.

To alleviate demands on case managers, Robin Hood, the City, and nonprofit shelter providers can experiment with making the application process more client-driven for those who have the emotional and technological capacity to manage it themselves. For example, instead of all correspondence going through the case manager, clients could be empowered to correct and submit their application packages independently, reducing the risk of delays caused by an overwhelmed case manager. Such changes could increase client autonomy while reducing job demands on case managers.

### **Proposed intervention 4: Incorporating pay-for-performance bonuses for both shelter providers and frontline staff**

The current payment structure in shelter contracts may not be effective in incentivizing the provision of high-quality case management and housing specialist services, as shelters are rewarded for keeping their beds filled instead of helping clients exit homelessness.

To address this, Robin Hood could collaborate with the City to pilot pay-for-performance measures in shelter contracts that incentivize exits. Notably, the Bloomberg administration implemented similar measures – and there is suggestive evidence that they worked (See Mini Case Study in Appendix F).

Offering incentives as bonuses (rather than penalties) is politically feasible and could encourage shelter providers to move clients out of shelters more quickly, leading them to provide more support and resources for employees. The City could also offer bonus payments directly to case managers and housing specialists to increase their motivation and resources.

### **Proposed intervention 5: Increase staffing ratios**

While there is currently a lack of rigorous evidence linking shelter staffing ratios to client outcomes in NYC homeless shelters, evidence from other contexts, particularly in healthcare settings, suggests such a causal link.<sup>34,35</sup>

Given promising evidence, Robin Hood and the City should consider partnering with a handful of select shelter providers to evaluate how increasing staffing ratios affect both employee and client outcomes.

### **Proposed intervention 6: Increase pay**

To attract and retain high-quality employees, Robin Hood and the City should experiment with increasing the low salaries of case managers and housing specialists, which currently start at

Recommendation 2

around \$40k per year. Evidence shows that increasing starting wages modestly increases new applicants and reduces employee turnover while improving organizational performance.<sup>36</sup>

### Comparing Pros and Cons of Proposed Workforce Interventions

Intervention	Pros	Cons
Anti-burnout interventions	<ul style="list-style-type: none"> <li>• Low-cost interventions with rigorous evidence</li> </ul>	<ul style="list-style-type: none"> <li>• Burnout may not be key driver of performance issues</li> </ul>
Launch a Training Academy	<ul style="list-style-type: none"> <li>• Case managers report great need for such a program</li> <li>• Similar training initiatives for Homebase staff have been (anecdotally) successful</li> </ul>	<ul style="list-style-type: none"> <li>• Training may have limited impact if shelter staff are overburdened</li> </ul>
Reduce job demands by making application process more client-driven	<ul style="list-style-type: none"> <li>• Low-cost method to reduce job demands while also increasing clients' perceived autonomy</li> </ul>	<ul style="list-style-type: none"> <li>• Not all clients will be positioned to drive process forward; could cause confusion about where responsibilities lie</li> </ul>
Pay-for-performance bonuses	<ul style="list-style-type: none"> <li>• Promotes conditions for shelter providers and employees to improve performance, without needing to specify exact path forward.</li> <li>• Allows for innovation and experimentation across shelter providers.</li> </ul>	<ul style="list-style-type: none"> <li>• Bonuses can be costly</li> <li>• Can create perverse incentives (e.g., to focus resources on the least-vulnerable clients, report fraudulent data, encourage clients to move into low-quality units)</li> <li>• Updating shelter contracts is politically challenging</li> </ul>
Increase pay	<ul style="list-style-type: none"> <li>• Increasing pay frequently cited as key lever to increase shelters' ability to hire + retain employees</li> </ul>	<ul style="list-style-type: none"> <li>• Increasing wages significantly raises cost in near and long term; cannot easily undo</li> </ul>
Increase staffing	<ul style="list-style-type: none"> <li>• Interviewees repeatedly stated that staffing ratios are far too low</li> </ul>	<ul style="list-style-type: none"> <li>• Expensive; difficult to hire and onboard new employees</li> </ul>

## Overall Recommendation: Prioritize Piloting Lighter-Touch Improvements and Modest Wage and Staffing Increases in Near Term

While all interventions show promise, Robin Hood and the City should prioritize (1) testing the lighter-touch interventions of increased training and anti-burnout resources, and (2) offering modest pay increases and staffing ratio adjustments. In the longer term, Robin Hood and the City should consider implementing pay-for-performance measures and making the CityFHEPS process more client-driven. This path forward balances the need for immediate progress, particularly regarding staffing and low pay, while acknowledging practical feasibility constraints.

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### Summary of Recommendation 2: Test Interventions to Address Deeper Barriers

Robin Hood should partner with the City, select shelter providers, and CBOs to test the following promising landlord-focused interventions:

1. Hire dedicated **landlord liaisons**
2. Create a **fast-track for application processing**
3. Offer **expanded tenant after-care services**

Recommended workforce-focused interventions:

- In the near term, prioritize offering **training programs and anti-burnout resources**, as well as modest **pay increases and staffing ratio adjustments**
  - In the longer term, consider implementing **pay-for-performance measures** and **making the CityFHEPS process more client-driven**
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## Recommendation 3: Broaden the Coalition to Improve CityFHEPS

Broaden Robin Hood's advocacy coalition to include landlords, brokers, and other housing professionals involved in administering or accepting vouchers. This can help raise political pressure on the Mayor to prioritize resolving problems with CityFHEPS

Successful implementation of a meaningful number of these recommendations requires making CityFHEPS a top Mayoral priority. For instance, getting the City to reduce veteran homelessness to near-zero required convening a task force that met every day for six months. Improving CityFHEPS deserves the same focus and prioritization.

To increase the Mayor's awareness of CityFHEPS-related issues, Robin Hood should help form a larger political coalition that includes landlords and housing professionals. This coalition can unite around the compelling message that if the City is going to operate CityFHEPS and expect landlords to treat voucher holders like other tenants, the process must work effectively. To start, Robin Hood should convene a landlord roundtable to build common ground and strategize on a path forward.

## Recommendation 4: Pursue Other Channels to Increase Affordable Housing Supply

Advocate for creative policies at the local, state, and federal levels to expand the supply of affordable housing

### Overarching Rationale

Even if CityFHEPS is significantly improved, a new constraint would quickly emerge: the lack of affordable housing supply in New York City. To ease this constraint, Robin Hood should continue to advocate for policies that will increase the supply of housing in New York City. While a thorough analysis of such policy options is beyond the scope of this PAE, I highlight three compelling advocacy opportunities:

## **Opportunity to Increase Affordable Supply 1: Advocate at the City, State, and Federal levels to strengthen the pipeline from shelter into supportive housing**

### **Rationale**

Strengthening the pipeline into supportive housing (i.e., affordable housing with supportive services on the property) will help shelter clients who are eligible for CityFHEPS in two ways. First, it will help ease demand for CityFHEPS. I spoke to several shelter clients who informed me that they had both CityFHEPS and 2010-E, a voucher for supportive housing. But, these clients reported that finding supportive housing was even more challenging than using CityFHEPS, and so they intended on using the CityFHEPS voucher instead. Expanding the pathway to supportive housing will thus help ease demand for voucher holders on the private market.

Second, creating a stronger pathway to supportive housing might help ease landlords' concerns about being unprepared to take in a tenant with potential behavioral or mental health problems. As mentioned, currently, there is an overlap between the pool of people with CityFHEPS vouchers and the pool of people that are eligible for supportive housing. Ensuring that people with additional barriers will in fact be able to find supportive housing (and thus less likely to rely on CityFHEPS) may help address landlords' concerns about accepting a CityFHEPS tenant.

### **Fixing the Problem**

The breaks in the pipeline to supportive housing start at the Federal and state level. According to one City official, the tax credit requirements for supportive housing projects are "a real headache." There is an untapped opportunity for advocacy organizations like Robin Hood to push the Department of Housing and Urban Development (HUD), which oversees supportive housing tax credits, as well as the Internal Revenue Services, which oversees the relevant tax code, to reduce unnecessary requirements and regulations around the production of supportive housing. Robin Hood should consider collaborating with a national partner, like the National Alliance on Homelessness, to advocate for this issue.

The City has created additional barriers by making the pathway into *available* supportive housing units extremely challenging. As of November 2022, over 2,600 supportive housing units in NYC were vacant.<sup>37</sup> According to one social services provider, it is "impossible" for a shelter client to navigate the rehousing process into supportive housing, which is even more complicated than the CityFHEPS process. Such burdens are especially problematic for individuals approved for supportive housing, who often experience mental and behavioral health problems. As a start, Robin Hood should support a similar project as this PAE but focused on 2010-E supportive housing vouchers.

## **Opportunity to Increase Affordable Supply 2: Push the City to build more housing for the lowest AMI tiers**

Currently, the City's affordable housing investments are geared towards higher area median income (AMI) tiers rather than housing for the City's most vulnerable.<sup>38</sup> The City tends to build at higher AMI tiers because such units require a smaller City subsidy per unit, which helps the City reach its affordable housing production targets.

One way to argue for building at the lowest AMI tiers is to advocate for the City's use of weighted cost-benefit analysis when determining its funding allocations. A weighted cost-benefit analysis would mean that \$1 in rent-savings for a lower-income household will be given a larger benefit weight than \$1 in rent-savings for a higher-income household. Currently, the City uses equal weights, essentially treating \$500 in rent savings for a family at 80% of AMI as creating the same "benefit" of \$500 in rent savings for a family at 30% of AMI. By incorporating weights, which other governments have done, the City's analyses will demonstrate a stronger case for building housing for the most vulnerable New Yorkers.<sup>xx</sup>

## **Opportunity to Increase Affordable Supply 3: Put legislative pressure on the State to allow for additional forms of landlord incentives**

Fixing CityFHEPS and the homelessness crisis should not just be New York City's problem; the state should also pull its own policy levers. For example, the State could offer income tax credits to landlords who own units that are currently vacant but need to be repaired, contingent that they give priority to a voucher holder when renting the unit. Currently, there are nearly 40,000 rent-stabilized units sitting vacant in New York City.<sup>39</sup> Reportedly, landlords are keeping the units vacant because, due to rent stabilization requirements limiting rent increases, they would be unable to recoup the costs of repairs. We need these units to be available for low-income New Yorkers now, and it should not just be the City's responsibility to make that happen.

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<sup>xx</sup> The UK government outlines guidance on weighted cost-benefit analysis in its "Green Book": <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government/the-green-book-2020>.

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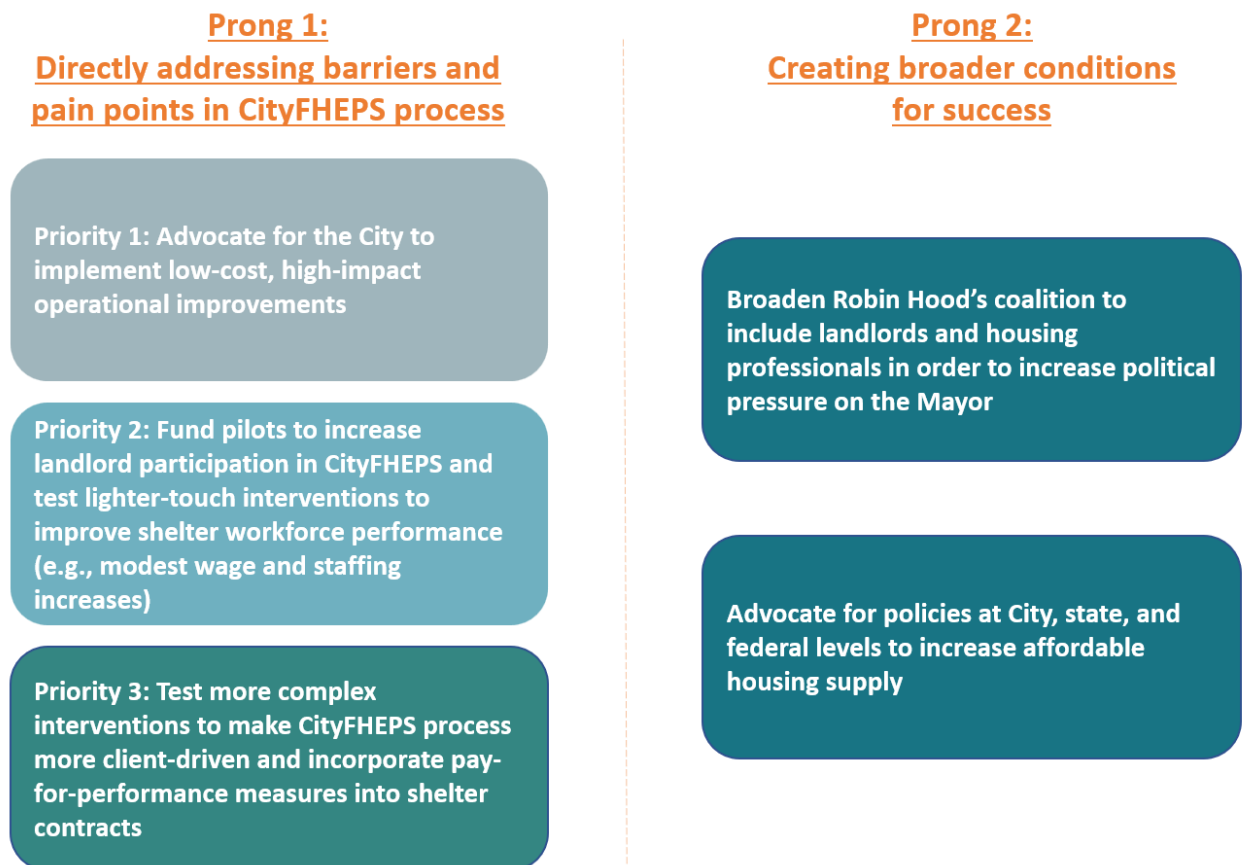
## Summary of Recommendations 3 and 4

To help foster broader conditions for success, Robin Hood should:

- **Broaden its advocacy coalition to include landlords** in order to increase political pressure on the Mayor
- Continue to advocate for policies at the City, State, and Federal levels to **increase the production of affordable housing**

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*Figure 9: Summary of All Recommendations for Robin Hood*





# Conclusion

## Conclusion

CityFHEPS has the potential to help solve homelessness in New York City. But achieving this goal requires getting the details of voucher administration right, particularly with regard to recruiting landlords, ensuring high-quality shelter services, and reducing unnecessary burdens. This PAE identifies a set of opportunities for Robin Hood to help the City get these details right.

First, this PAE identifies operational pain points in the CityFHEPS rehousing process and presents an opportunity for Robin Hood to advocate for low-cost and high-impact solutions. In addition, this PAE identifies structural barriers in the CityFHEPS process and charts a path forward for Robin Hood's role in addressing them. By contributing philanthropic funding and programmatic expertise, Robin Hood can empower the City and its contracted shelter providers to test new ideas to increase landlord participation and support frontline shelter staff. Finally, this PAE recognizes the need for Robin Hood to foster broader conditions for success, particularly towards increasing political pressure on the Mayor and expanding the supply of affordable housing.

While this PAE focuses on homelessness in New York City, its framework and findings are more broadly applicable. In particular, with the expiration of the Emergency Rental Assistance Program (ERAP) and dwindling America Rescue Plan Act (ARPA) funds, many state and city governments are interested in creating their own locally-funded voucher programs, and have looked to CityFHEPS as a promising model. Through continuous innovation and improvement, Robin Hood and the City can not only assist New Yorkers in exiting homelessness, but also create best practices to benefit housing-insecure households across the United States. This effort can produce a model for effective public-private collaboration and generate a ripple effect of positive change in the fight against homelessness and housing insecurity nationwide.



# Appendices

## Appendix A: Sampling and Interview Methodology

### Interview Methodology

#### Interviewee Protocols

Interviews typically lasted between 30 minutes and 1 hour. Given the sensitive nature of this topic, plus Harvard's data security protocols, no interviews were recorded; however, with the permission of the interviewee, I took extensive notes.

In addition, due to the personally and politically sensitive nature of the topic, all interviewees are quoted anonymously. Interviewees with lived experience, housing professionals outside of the nonprofit sector, and case managers were offered a \$30 digital gift card for their participation.

#### Reaching Interviewees

To reach interviewees working at nonprofits, research organizations, and for the City, I relied on connections from Robin Hood, personal connections, cold outreach, and snowball sampling.

To reach housing professionals outside of the nonprofit space, I conducted outreach from listings on Facebook and Craigslist.

To interview individuals currently or formerly experiencing homelessness, I relied on two approaches:

- Cold outreach, primarily via Facebook and Craigslist
  - o E.g., if someone posted on Craigslist or in a Facebook Group that they were trying to find housing with a CityFHEPS voucher, I would contact them to see if they were interested in being interviewed.
- Outreach via social services providers.
  - o Several social services providers for those experiencing homelessness connected me to individuals in their network. Importantly, individuals whom I connected to this way were less likely to be "tech-savvy" compared to individuals with whom I connected online.

#### Representativeness of Interviewee Samples

**Landlords:** Given the small sample size (N =6), the sample of landlords is unlikely to be representative of landlords in the City overall. In particular, my sample was biased towards including landlords who are likely to accept CityFHEPS vouchers. While this sample may be less useful in understanding why *other* landlords do not work with the program, it is useful for understanding the issues that emerge for those who do participate.



## *Appendices*

To address concerns around landlord representativeness, I drew evidence on landlords' perceptions and experiences from other sources, including evidence from social media and experts' knowledge.

**Individuals currently or formerly experiencing homelessness:** In my sample of 11 interviewees, I was able to talk to individuals in both single adult and family households, who were at different stages of the CityFHEPS process. Moreover, given my dual sampling technique, I connected with relatively "tech-savvy" individuals who were quite active in their online housing search, as well as individuals who were less confident navigating technology. In this sense, I captured a relatively broad cross-sample of interview participants.

On the other hand, a sample of 11 people is unlikely to be representative and adequately capture the range of experiences in the shelter system. Moreover, it is likely that those who were willing to participate in this research were more likely to have particularly struggled in the shelter system compared to the average person. While this potential bias is important to keep in mind, it does not invalidate the findings of this study. In fact, understanding the experiences of those who have struggled the most in the shelter system – and are thus likely to stay in it for the longest -- is in itself a worthwhile endeavor.

## Appendix B: CityFHEPS Eligibility and Voucher Amounts

### CityFHEPS Eligibility

In general, households in DSS-operated shelters can access CityFHEPS vouchers if they meet the following criteria:

1. Have a gross income at or below 200% of the federal poverty level<sup>40</sup>:
  - \$29,160 for a household of 1
  - \$39,440 for a household of 2
  - \$49,720 for a household of 3
  - \$60,000 for a household of 4
2. Be on Public Assistance, if eligible
3. Not qualify for State FHEPS
4. Have been in shelter for 90 days
5. Be a legal resident of the U.S.

Adults in families with children must work a combined 14 hours per/week, while single adults can work any number of hours to meet the work requirement. There are also exceptions to the work requirement for individuals with disabilities and those over the age of 60.

Individuals can exempt from the requirements above in limited situations: for example, if an individual’s shelter is closing, if the individual is a veteran, or if the individual is referred from a qualifying program.<sup>41</sup>

### CityFHEPS Voucher Maximum Rent Amounts

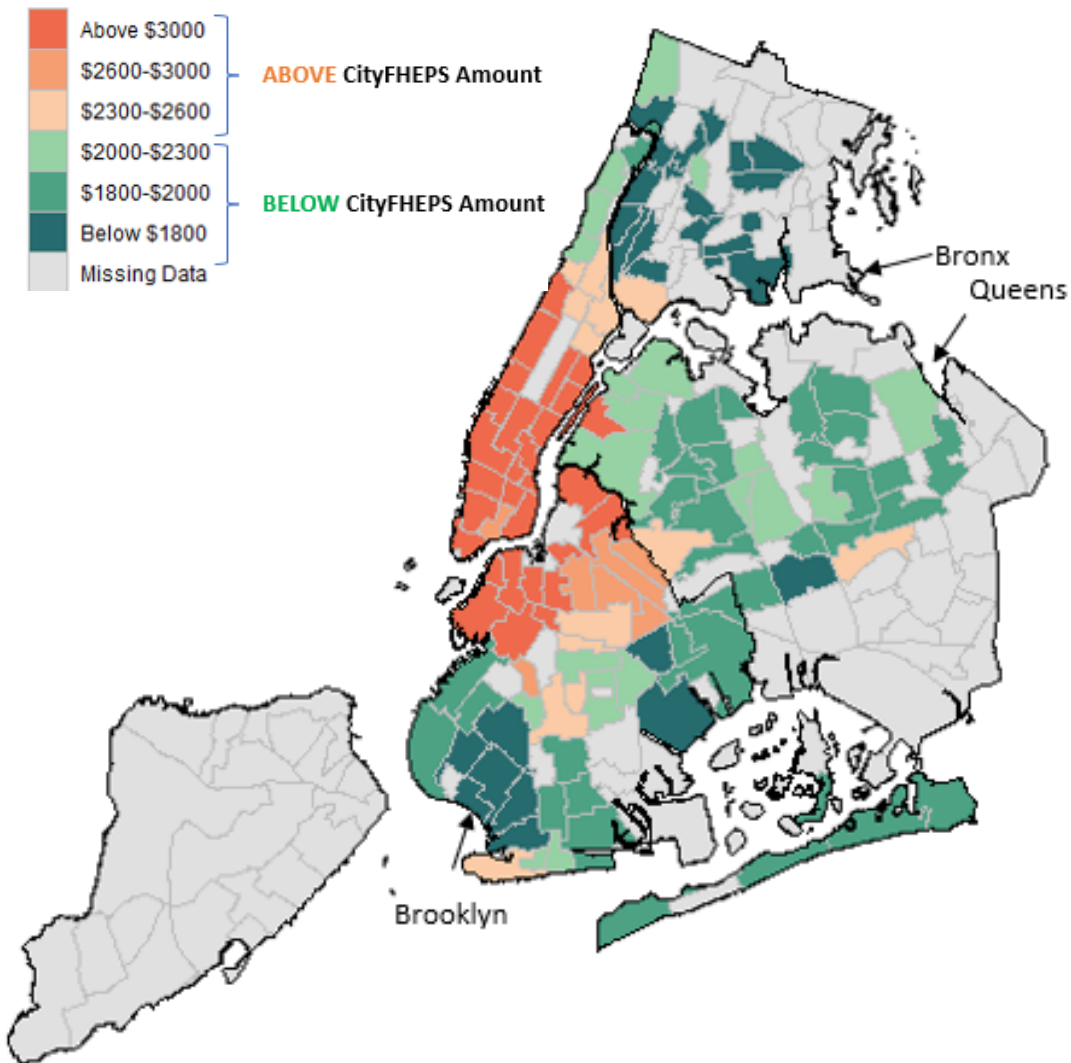
CityFHEPS will cover rents up to the following amounts<sup>42</sup>:

Family Size	Unit Size	All Utilities Included	No Utilities Included
1	SRO	\$1,751	\$1,574
1	0 (Studio)	\$2,335	\$2,158
1 or 2	1	\$2,387	\$2,184
3 or 4	2	\$2,696	\$2,443
5 or 6	3	\$3,385	\$3,084
7 or 8	4	\$3,647	\$3,296

Given these voucher amounts, CityFHEPS voucher recipients can afford apartments in many parts of the City, though not as easily in the highest-income parts in Manhattan and Brooklyn (see Figure 10).

Figure 10: CityFHEPS Voucher Holders Can Typically Afford Units in Queens, the Bronx, and Southern and East Brooklyn

### Median Asking Rent for a One Bedroom in NYC



Note: Median rents are calculated from StreetEasy Data using the average of median monthly rents from February 2022-January 2023. Author matched StreetEasy rent geographies to an NYC NTA shapefile

## Appendix C: Background on Homelessness, Shelter System, and CityFHEPS

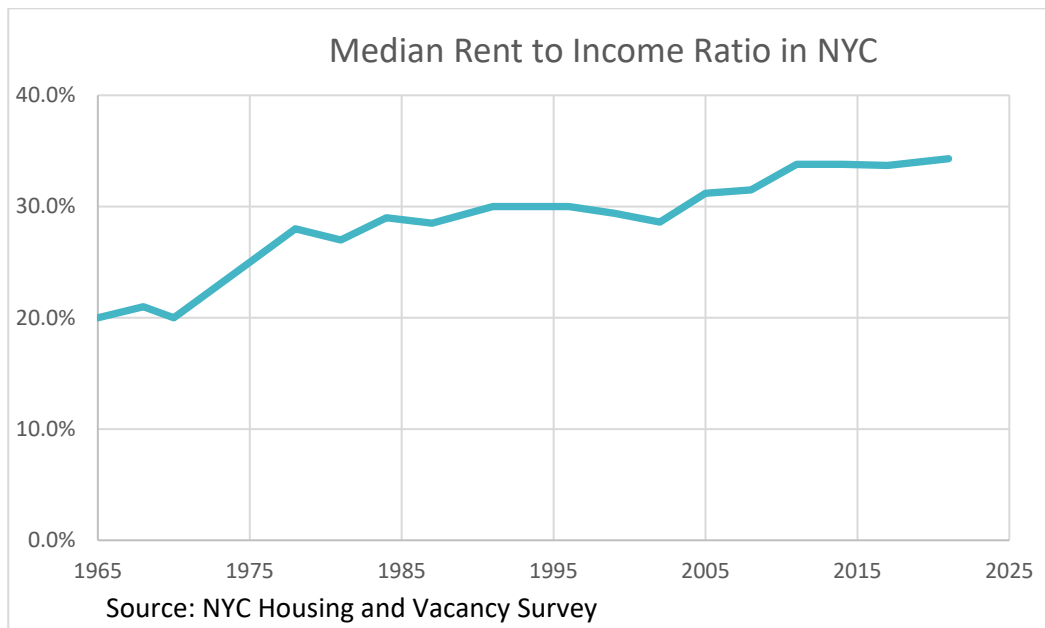
### The Key Driver of Homelessness in NYC: a Lack of Affordable Housing

#### Lack of Affordable Housing

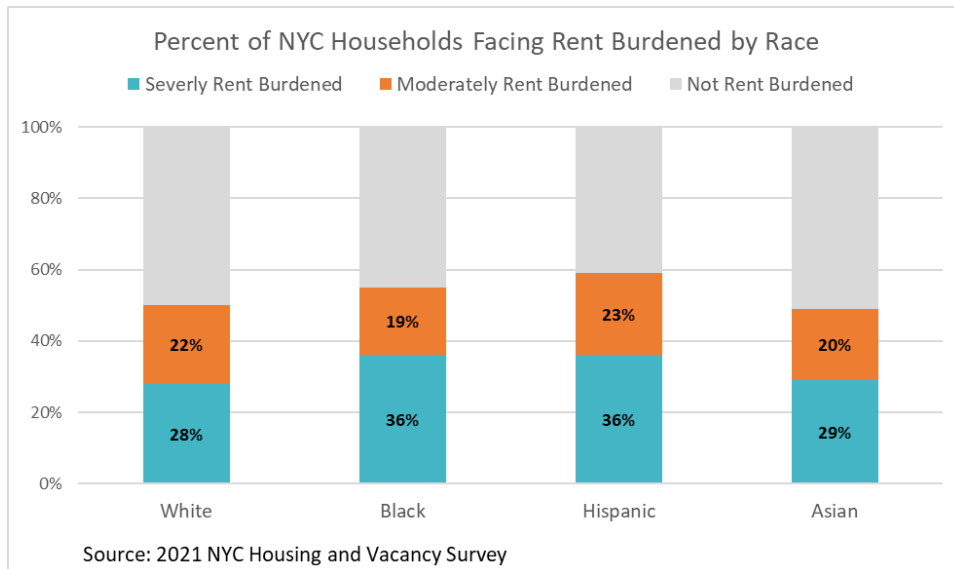
For years, rent increases in New York City have outpaced wage growth, leaving many residents struggling to keep up with the rising cost of living and maintain stable housing.<sup>43</sup> Over half of New York City residents are now rent-burdened, meaning that they spend more than a third of their income on housing expenses.<sup>44</sup> Unfortunately these issues have had a disproportionate impact on low-income and minority households.

While a thorough discussion of housing affordability issues is beyond the scope of this PAE, the key underlying cause of these affordability issues is the lack of supply, especially at affordable levels.<sup>45</sup>

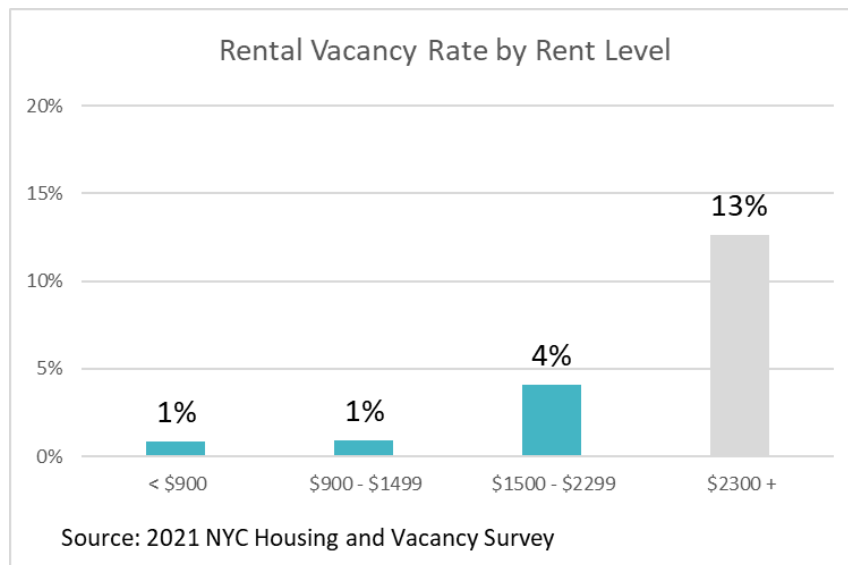
*Figure 11: Rents are Increasing as a Share of New Yorkers' Income*



**Figure 12: The majority of New Yorkers are rent-burdened, with Black and Hispanic households experiencing the largest burdens**



**Figure 13: Vacancy rates are staggeringly low for low-cost rentals, indicating affordable supply constraints**



*Note: it is likely that rental vacancy rates have declined even further since 2021, when NYC was still in the midst of an active COVID-19 pandemic*

## Who Becomes Homeless

In New York City there are over 400,000 low-income households devoting more than half of their income towards rent.<sup>46</sup> Shocks such as evictions, job loss, and domestic violence can trigger homelessness for these low-income households.<sup>47</sup> The fact that about half of the working-age people experiencing homelessness in New York City are employed highlights the financial fragility of low-income working households.<sup>48</sup> Additionally, it is important to highlight that families with children make up the majority (62%) of the shelter population in NYC.<sup>49</sup>

Finally, while mental and behavioral health problems can increase the risk of homelessness, they are not the primary drivers. Estimates suggest that around 20-30% of homeless individuals in NYC experience mental health problems, which, while higher than population-wide rates, still means that the majority of the homeless population does not have a mental health problem.<sup>50</sup>

## NYC Shelter System and CityFHEPS Primer

### The Right to Shelter in NYC Places Unique Constraints on NYC Government

In New York City, all individuals have the right to shelter, meaning that any individual has a legal right to stay in a City shelter facility.<sup>51</sup> This provides an essential safety net for all people, which does not currently exist virtually anywhere else in the U.S.<sup>52</sup> As a result of the right to shelter, street homelessness is a relatively smaller issue in NYC compared to other similar cities; however, the shelter census tends to be higher. For example, NYC has approximately twice the number of individuals in shelter per capita compared to San Francisco.<sup>53</sup>

Some housing-first advocates have argued that the Right to Shelter in New York City has led the City to myopically focus on providing shelter, rather than focusing on solving homelessness through permanent housing.<sup>54</sup> This claim is at least partially supported by the City's budgetary data. In FY22, the City spent nearly \$3 billion on shelter services alone, about 3% of the City's annual expense budget. In comparison, the City spent about \$200 million on CityFHEPS.<sup>55</sup>

### The New York City Department of Social Services Oversees CityFHEPS

New York City's programs to address and prevent homelessness are primarily administered by the Department of Social Services (DSS). The Department of Social Services (DSS) is comprised of the Human Resources Administration (HRA) and the Department of Homeless Services (DHS). DHS is primarily responsible for overseeing the shelter system, while HRA administers social services, including social safety net programs like SNAP. Both DHS and HRA are involved in the CityFHEPS voucher administration process.

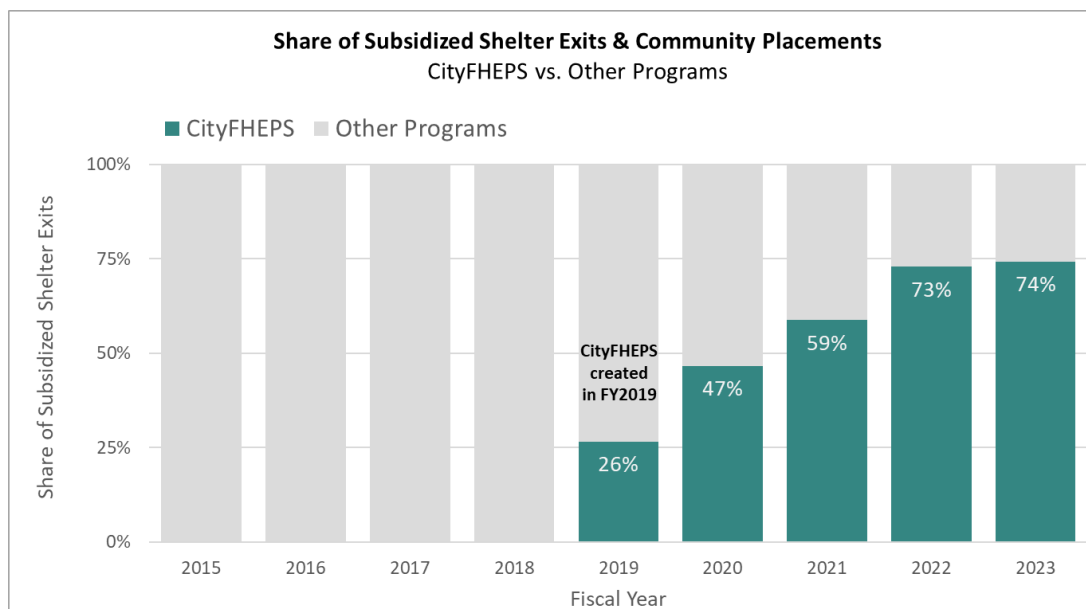
## NYC Shelter Providers Are Key Program Implementers

Shelter services in NYC are primarily delivered through DHS-contracted providers. Currently, DHS holds contracts with about 70 providers.<sup>56</sup> Through these contracts, shelters provide both a physical place to stay as well as case management and housing navigation services. NYC shelter contracts are often critiqued for creating a perverse incentive: shelter providers make money by having filled shelter beds. Moreover, shelter contracts are often created inconsistently, with varying payment amounts and structures. While a detailed analysis of shelter contracting practices is outside the scope of this PAE, I provide recommendations related to incorporating pay-for-performance metrics into contracts in Recommendation 2 and supporting evidence in Appendix F.

## CityFHEPS Is NYC’s Main Tool to Help Families Exit from Shelters

Most households in DHS shelters rely on a subsidy to exit, and the most common subsidy is CityFHEPS. To date in FY23, 74% of households exiting NYC shelters with a subsidy relied on a CityFHEPS voucher. Last year, in total 15,539 individuals in New York City were rehoused using a CityFHEPS voucher.<sup>57</sup>

**Figure 14: CityFHEPS Has Become NYC's Main Tool to Help Families Exit and Avoid Shelter**



Source: Data provided from DSS in response to a Freedom of Information Law (FOIL) request.

Note: Data for FY23 is through November 2022.

## CityFHEPS is an Innovative Rehousing Tool

It is crucial to underscore the fact that CityFHEPS is an innovative program. No other city in the United States funds a housing voucher program with such broad eligibility and scale as CityFHEPS. Instead, virtually all local governments allocate the vast majority of their rental assistance spending towards project-based assistance.<sup>58</sup> This is in spite of evidence that, in most contexts, tenant-based rental assistance is the more cost-effective strategy. Tenant-based strategies also have the advantage of allowing tenants greater mobility and neighborhood choice.<sup>59</sup>

## DSS Operates CityFHEPS Under Budgetary, Legal, and Political Constraints

DSS operates CityFHEPS under significant constraints. In FY23, the program is funded for \$237 million.<sup>60</sup> However, this investment is particularly noteworthy considering that New York City spends a staggering \$3 billion annually on shelter provision due to its legal mandate to provide such services. The recent influx of migrants and asylum seekers into the shelter system has significantly driven up these costs. The New York City Office of Management and Budget estimates that in FY23 alone, the City will spend \$1.5 billion providing shelter to asylum seekers.<sup>61</sup>

Given these budgetary constraints, DSS relies on federal TANF and State Emergency Assistance funds to help reimburse portions of CityFHEPS voucher amounts and associated fees such as moving expenses. Critically, this reimbursement process requires DSS to verify various eligibility requirements, resulting in increased administrative burdens on shelter clients. Moreover, the City's budgetary constraints also translate into underfunding of its technology, which impedes its ability to process applications, collect data, and transmit information between DSS and DHS.

Legally, there are limitations to the City's ability to expand the program. For example, while some advocates disagree, the City maintains that, under Federal Law, it cannot provide rental assistance to undocumented New Yorkers.<sup>62</sup>

Politically, the city is constrained by its fear of fraudulent individuals posing as landlords and the potential negative publicity from such incidents ending up in the media. To mitigate this risk, the City has implemented its robust preclearance and inspection process.<sup>63</sup>

Despite these challenges, the City has recently made strides to improve the program, such as:

- Expanding eligibility criteria
- Piloting an electronic payment portal for landlords and a client-facing portal
- Expanding AccessHRA to allow for CityFHEPS renewals
- Creating a customer service center for voucher holders and landlords
- Allowing Legal Aid to submit CityFHEPS applications for clients in the community

This PAE commends the City's efforts to improve the program and urges Robin Hood to hold the City accountable for implementing these changes effectively.<sup>64</sup>



## Appendix D: Timeline of New York City's Housing Subsidy Programs

CityFHEPS is the most recent iteration in a long series of City housing voucher programs that have attempted to address homelessness and, in particular, reduce the City's shelter census.

Timeline<sup>65</sup>:

- In 2004, the Bloomberg Administration launched **Housing Stability Plus** – a City-funded rental voucher administered by the Department of Social Services that lasted 5 years and declined in value by 20% each year. The goal of the program was to supplant and replace the federal Section 8 vouchers that were being used to move people from City shelters into permanent housing.<sup>66</sup>
- In 2007, the Bloomberg Administration replaced Housing Stability Plus with **Advantage**, a two-year subsidy that was also intended to help move people from City shelters into permanent housing. **The goal of the program was to improve on Housing Stability Plus by clarifying rules and increasing the voucher amount.** The subsidy initially required recipients to work 20 hours a week or more, but later expanded eligibility. At the time, Commissioner of Homelessness Services Robert Hess lauded the program as “**the most substantial and generous work incentive local subsidy program ever**”.<sup>67</sup>
- **In 2011, under economic distress in the fallout of the Great Recession, New York State, which paid for two-thirds of Advantage, suddenly eliminated its funding portion. The City, unable to sustain funding on its own, cut the remaining funding – abruptly stopping payments for thousands of households who relied on the subsidy to pay rent. Within two years of the Advantage's end, about 50% of households with Advantage vouchers ended up returning to shelter, including about 8,500 families.<sup>68</sup> The sudden ending of Advantage seeded deep mistrust with landlords.**
- From 2014-2015, the de Blasio administration created several voucher programs targeted toward households in shelter, including the City Family Exit Plan Supplement (CityFEPS) and Special Exit and Prevention Supplement (SEPS) for single adults and adult families. The administration also created two programs for households in the community – Living in Communities (LINC) and the City Family Eviction Prevention Supplement.<sup>69</sup>
- **In 2018, the de Blasio administration combined SEPS, LINC, and CityFEPS into one consolidated program: CityFHEPS (New York City Family Homelessness and Eviction Prevention Supplement).** The goal of the consolidation was to reduce confusion for voucher holders and landlords, who found the prior array of programs – each with their own target populations, rules, and processes – to be too confusing.
- In 2021, CityFHEPS increased to Fair Market Rents (FMR) rents (i.e., Section 8 Rents set out by HUD), which accounted for about a 50% increase in voucher payment amounts.

Anecdotally, the FMR increase has not had a substantial impact on increasing move-outs from shelters.

This timeline demonstrates two key takeaways:

**First, these constant changes in voucher regimes – and in particular the abrupt ending of Advantage in 2011 – have seeded a deep mistrust in New York City-funded voucher programs among the landlord and real estate community.** Landlords in the City know that the City has stopped paying the rent for voucher holders once before, leaving many with no choice but to evict tenants. From their perspective: what’s to stop the City from cutting off rental payments again?

**Second, the tumultuous path and constant re-iterations of subsidy programs in New York City are indicative of the inherent challenges of getting a local housing subsidy program “right.”** Offering too small of a subsidy means that landlords will refuse to work with the program; offering too big of a subsidy can mean wasted City dollars, and can increase rents for residents without vouchers, particularly in low-income parts of the City. Moreover, compared to other social safety net programs – like SNAP, TANF, child care subsidies, etc. – housing voucher programs are inherently more administratively complex.<sup>xxi</sup>

Given the inherent challenges involved in administering rental vouchers, it is little surprise that no other city in the United States operates a housing voucher with such broad eligibility and scale as CityFHEPS (or its predecessors).<sup>70</sup>

Thus, while the deficiencies of CityFHEPS evoke wide criticism from voucher holders, landlords, advocates, and other stakeholders – on balance, CityFHEPS and its predecessors should be understood as a part of an innovative, evidence-based, and iterative approach to addressing homelessness at the local level. And that New York City has operated its own local housing voucher programs for ~20 years, under immense financial constraints, is an impressive feat.

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<sup>xxi</sup> For instance, housing voucher programs require large up-front payments and successful coordination across multiple stakeholders (tenant, broker, landlord, etc.).

## Appendix E: Mini Case Study – Lessons Learned from Emergency Housing Vouchers

New Destiny and Stonewall CDC are two NYC-based CBOs that have played key roles in increasing landlord participation in the Emergency Housing Voucher (EHV) program, which is a federally-funded but locally-administered program created by the American Rescue Plan Act in 2021.

Early on in the roll-out of EHVs, NYC got off to a slow start in re-housing households, in part because of a misguided strategy that focused on “cold outreach” to landlords via the Mayor’s Public Engagement Unit (PEU).<sup>71</sup> Essentially, CBOs would make a list of landlords who expressed any interest in EHVs, and the Mayor’s PEU was responsible for reaching out. Unfortunately, this tactic was unsuccessful at increasing landlord participation. **The core issue of this approach was that landlords were hesitant to work with a new program, and they required much more hand-holding and personal contact than what the centralized Mayor’s PEU offered.**

In the next iteration of the process, New Destiny discovered a more successful model: **hiring dedicated landlord liaisons providing on-the-ground support within communities** who could (1) identify landlords with available units, (2) explain the process to landlords and answer questions, and (3) critically, when landlords got frustrated by process delays, offer a bonus payment to entice them to stay. New Destiny found that this approach allowed them to connect households to units much more quickly. However, recently there have been reported issues with tenant after care.

Stonewall CDC also found success in rehousing households by focusing on on-the-ground landlord engagement.<sup>72</sup> Whereas New Destiny focused more so on encouraging a broader pool of landlords to participate in voucher programs, Stonewall CDC focused on building relationships with brokers and landlords in order to turn them into repeat clients. As Sayief Leshaw of Stonewall explained: *“One of our navigators connected with a broker ..... They’ve now worked together on 5 different buildings, the most recent of which was 23 units. The efficacy of this close working relationship helped the broker quickly fill units contracted to him by owners, **not only strengthening our relationship with him, but also building his relationships with owners. We’re following this model almost across the board, leaning into more engaged relationships resulting in exclusive access to their inventory and aiding them in developing their networks.**”<sup>73</sup>*

By building strong relationships with landlords and brokers, Stonewall has been able to secure prioritized unit access for voucher holders – an amazing feat given widespread discrimination.

Another key-takeaway from Stonewall’s work is its commitment to supporting its navigators. Whereas non-profit shelter providers have a hard time hiring and retaining housing navigators, **CBOs have had greater flexibility to increase wages and resources for their landlord liaisons.** For example, Stonewall CDC offers their navigators work-from-home flexibility, regular staff appreciation days, and adequate compensation (\$65k). These strategies, at least anecdotally, have increased staff retention and performance

## Appendix F: Mini Case Study – Bloomberg’s Performance Incentive Program

Although Mayor Bloomberg's performance-obsessed approach to governing New York City was often controversial and faced setbacks,<sup>xxii</sup> his administration's data-driven and housing-first approach to reducing homelessness is recognized as a "national model."<sup>74</sup>

At the heart of this model was the implementation of performance-based contracts for homeless shelter providers. Typically, homeless shelters are paid a per-diem rate for each individual staying in their facility, without any consideration for their outcomes. Given this payment structure – plus the fact that shelter intake and exit are relatively costlier activities for providers – shelters tend to have a strong financial incentive to keep their shelters full, with the same people staying for long periods of time. This creates several issues, including exacerbating the disruptiveness of homelessness and imposing significant costs on the City. The adoption of performance-based measures helps address these problems.

Mayor Bloomberg introduced the Performance Incentive Program (PIP) in 2003 in the family shelter system.<sup>75</sup> The outcomes-oriented contracts evaluated shelter performance based on three measures: number of exits (“placements”), length of stay, and shelter recidivism. Providers could earn a bonus if they exceeded targets, earn nothing if they met them, or lose payments if they fell short. Shelters’ overall payments could increase by up to 10% or decrease by 15%.<sup>76</sup> The PIP was later extended to the single adult shelter system.

Although a more comprehensive evaluation would be helpful, available data indicate that PIP was effective. In the family shelter system, the rate of placements rose by 39% between FY2003 (when introduced) and FY2008, from an average of 444 to 616 placements per month.<sup>77</sup> Similarly, after a revised PIP was introduced in CY07, the single adult shelter system experienced a 21% increase in placements compared to the previous year. The impact of the PIP on other metrics remains uncertain.

Not surprisingly, many providers were unhappy with the new evaluation and reward system and lobbied to have it removed.<sup>78</sup> Consequently, when the de Blasio administration took office, the performance payments were discontinued. While a common narrative is that Mayor de Blasio wanted to take a “gentler” approach with the City’s nonprofits, according to DHS employees, due to pressure from the shelter lobby, the State required to City to terminate the payments.<sup>79</sup>

Despite potential political challenges, it is worthwhile to consider the performance-based model again. For example, the New York City Independent Budget Office estimates that reinstating the incentive payments could save the system \$21 million annually, while significantly improving shelter client outcomes.<sup>80</sup>

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<sup>xxii</sup> For example Bloomberg’s Advantage voucher program, which the state and City abruptly cut funding for, led to thousands of families falling back into homelessness and seeded deep mistrust among landlords. See Appendix D.

## Appendix G: Evaluating Impact of Promising Interventions

Successful implementation of pilot programs will require sophisticated program evaluation techniques to assess the impact of different interventions. In particular, both Robin Hood and the City should keep in mind that, in general, any evaluation of the proposed pilot program will likely be biased toward showing a larger benefit than what could be achieved Citywide. This is for several reasons:

- Likely **displacement effects**. Displacement effects refer to the possibility that when testing a micro-level intervention, like a pilot, the program will just shift the “good outcomes” towards the treated group, at the expense of everyone else. For example, increasing pay for case managers might just move the best case managers in the City to the pilot shelter, at the expense of other shelters.<sup>81</sup> Likewise, landlord liaisons might just make it easier for shelter clients participating in the pilot to find a given unit, thus preventing another household from moving in. The concern with these displacement effects is that they will show positive impacts at the shelter-, or other micro-level, but in the aggregate overall benefits will be minimal. This could lead to a situation where, while an intervention might perform well in a pilot, it might not scale well. To address this issue, evaluators should look at census-wide exit rates and consider other program evaluation techniques.
  
- Another concern is that even if landlord outreach or workforce initiatives are successful in small pilots, **the intervention may be less successful when brought to scale**. This can happen for several reasons. For example:
  - Integrating new processes (e.g. incentive payments) at scale into the City’s systems can be technologically challenging
  - While there may be sufficient landlords or new case managers to recruit in small samples, once the demand for these groups increases, it might be difficult to find them.
    - To evaluate the potential for this concern, Robin Hood and the City should test increasing the scale of the program before expanding Citywide, and assess if there are diminishing benefits with scale.
  - The implementation of a program at scale may result in a loss of fidelity to the original model.

# Endnotes

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## INTRODUCTION

<sup>1</sup> NYC Open Data, "DHS Homeless Shelter Census," *City of New York*, accessed March 31, 2023, <https://data.cityofnewyork.us/Social-Services/DHS-Homeless-Shelter-Census/3pjj-ncn9>.

<sup>2</sup> Mayor's Office of Operations, "FY2022 MAYOR'S MANAGEMENT REPORT," *City of New York*, accessed March 31, 2023, [https://www1.nyc.gov/assets/operations/downloads/pdf/mmr2022/2022\\_mmr.pdf](https://www1.nyc.gov/assets/operations/downloads/pdf/mmr2022/2022_mmr.pdf), pg. 236.

<sup>3</sup> Elise Peters et al., "Exposure to a natural environment to improve parental wellbeing in parents in a homeless shelter: a multiple baseline single case intervention study," *Journal of Social Distress and Homelessness* (2021): 1-12.

<sup>4</sup> Sophie Wickham, "Effective interventions for homeless populations: the evidence remains unclear," *The Lancet Public Health* 5, no. 6 (2020): e304-e305.

<sup>5</sup> John C. Buckner, "Understanding the impact of homelessness on children: Challenges and future research directions," *American Behavioral Scientist* 51, no. 6 (2008): 721-736.

<sup>6</sup> "FY2022 MAYOR'S MANAGEMENT REPORT," p. 238.

<sup>7</sup> The City does not share information about CityFHEPS utilization rates. I approximate a utilization rate of ~35-45% from two independent calculations.

First, a report in 2019 revealed that out of 4,118 families who were qualified for CityFHEPS, only 178 were able to secure permanent housing every month. [See Kazis, Noah M. "The failed federalism of affordable housing: Why states don't use housing vouchers." *Mich. L. Rev.* 121 (2022): 221, pg. 246.]

If we consider an average of 4,118 eligible families searching for housing each month, with 178 of them finding a home, and 178 households becoming newly eligible, this result in a utilization rate of about 35% (2,136 out of 6,076).

Second, I conduct a bank-of-the-envelope calculation based on data from disparate sources.

Relevant data points and calculations:

- From City interviews, I learned that about 60% of CityFHEPS vouchers are for clients in shelter and that about a third of clients in shelter have shopping letters.
- Over the course of CY2022, the daily shelter census was 52k on average.

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- If ~30% of residents have shopping letters (which is likely an underestimate for this period, given that asylum seeker were a lower portion of the census), that means that on any day there were about ~17k people with shopping letters.
  - During a January 18, 2023, City Council testimony, Molly Park testified that, through September of CY2022, there were 4,800 CityFHEPS moves. If we assume that October-December tracked Jan-Sept, we can estimate 6,400 annual move-outs for last year. I also assume a move-out is associated with 2 people on average (based on City shelter exits data).
  - In an optimistic scenario: assume that of the 12,800 people who moved, ~7,680 (60%) were clients in shelter. This gives us a utilization rate of ~45% (7,680 individual moves / 17,000 people in shelter with shopping letters).
    - However, this estimate is likely very optimistic because, in practice, the population of shopping-letter holders in shelter for CY22 is likely higher than 17k since that figure is based on an average point-in-time count. If we looked at the number of *unique* households in shelter who were given shopping letters *over the entire course of 2022*, the number would likely be a lot higher.

<sup>8</sup> Citizens Budget Commissions, interview with New York City Budget Director Jacques Jiha, What's the [DATA] Point?, podcast audio, June 8, 2023, <https://cbcny.org/podcast/43-billion-nyc-budget-director-jacques-jiha>, around 24-25 minute mark.

<sup>9</sup> Office of the Mayor, "Transcript: Mayor Eric Adams Takes Major Steps to Help New Yorkers Access High-Quality Housing More Quickly, Move From Streets to Permanent Homes," *City of New York*, last modified January 10, 2023, accessed March 31, 2023. <https://home3.nyc.gov/office-of-the-mayor/news/836-22/transcript-mayor-eric-adams-takes-major-steps-help-new-yorkers-access-high-quality-housing-more>.

<sup>10</sup> "FY2022 MAYOR'S MANAGEMENT REPORT," pg. 238.

## KEY FINDINGS

<sup>11</sup> Ibid.

<sup>12</sup> City of New York City Council, "Transcript of the Minutes of the Committee on General Welfare, Wednesday, January 18, 2023," pg. 45. <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=5995863&GUID=4F0FC024-E228-4E8D-809B-12A8007C4DA4&Options=&Search=>.

<sup>13</sup> To support this point: a matched-pair test found that individuals with housing subsidies received responses to apartment listings at a rate of only 21%, while individuals with employment income received responses at a rate of 61%.

See Chloe Sarnoff and Casey Berkovitz, "Strengthening Housing Stability and Increasing Opportunity for Low-income Families in New York City," in Robin Hood, TCF, and Next100, "From Crisis to Opportunity: A Policy Agenda for an Equitable NYC," July 2021, accessed April 1, 2023. [https://production-tcf.imgix.net/app/uploads/2021/07/22091954/CrisistoOpportunity\\_7.22.pdf](https://production-tcf.imgix.net/app/uploads/2021/07/22091954/CrisistoOpportunity_7.22.pdf), pg. 97.

<sup>14</sup> Jennifer Hinojosa, "Testimony: Improving and Expanding CityFHEPS (testimony, Committee on General Welfare, Oversight - The CityFHEPS Rental Assistance Program, January 18, 2023)," accessed April 3, 2023, <https://www.cssny.org/news/entry/testimony-improving-and-expanding-cityfheps>.

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<sup>15</sup> Natalie Duddridge, "CityFHEPS Rental Assistance Program Expanding to Help More New Yorkers," *CBS New York*, March 23, 2023, <https://www.cbsnews.com/newyork/news/cityfheps-rental-assistance/>.

<sup>16</sup> HUD Office of Policy Development and Research, "PHAs Encourage Landlord Participation With Incentives," *Evidence Matters*, Winter 2019, <https://www.huduser.gov/portal/periodicals/em/winter19/highlight3.html>.

<sup>17</sup> Ibid. In a HUD study, when rental assurance funds were allocated, only about half were used, suggesting that landlords' perceptions of potential problems related to voucher holders as tenants were overblown.

<sup>18</sup> David Brand, "NYC's Long-Understaffed Voucher Discrimination Unit Now Has Zero Employees," *City Limits*, 13 April 2022, <https://citylimits.org/2022/04/13/nycs-long-understaffed-voucher-discrimination-unit-now-has-zero-employees/>.

<sup>19</sup> "StreetEasy Data Dashboard," *StreetEasy Blog*, accessed April 3, 2023, <https://streeteasy.com/blog/data-dashboard/>.

<sup>20</sup> "Transcript of the Minutes of the Committee on General Welfare, Wednesday, January 18, 2023," pg. 61.

<sup>21</sup> NYC HPD, "2021 New York City Housing and Vacancy Survey: Selected Initial Findings," May 16, 2022, accessed April 3, 2023, <https://www.nyc.gov/assets/hpd/downloads/pdfs/services/2021-nychvs-selected-initial-findings.pdf>, Table 1.

<sup>22</sup> "Case Manager - Atlantic House," CAMBA, accessed April 2, 2023, <https://camba.org/career/case-manager-atlantic-house-2/>.

<sup>23</sup> Mullainathan, Sendhil, and Eldar Shafir. *Scarcity: Why having too little means so much*. Macmillan, 2013.

<sup>24</sup> Attrition rate is finding from interview; 32% vacancy rate is from City Council Testimony of Urban Pathways. See "Transcript of the Minutes of the Committee on General Welfare, September 13, 2022," pg. 117.

<sup>25</sup> "Transcript of the Minutes of the Committee on General Welfare, Wednesday, January 18, 2023," pg. 63.

## RECOMMENDATIONS

<sup>26</sup> NYC Department of Social Services, "DSS Policy Bulletin #2021-009," December 29, 2021, [http://onlineresources.wnyc.net/nychra/docs/dss-pb-2021-009\\_cityfheps.pdf](http://onlineresources.wnyc.net/nychra/docs/dss-pb-2021-009_cityfheps.pdf).

<sup>27</sup> David Brand, "Bronx Housing Complex Must Accept Housing Vouchers, Judge Rules," *City Limits*, 1 Aug. 2022, <https://citylimits.org/2022/08/01/bronx-housing-complex-must-accept-housing-vouchers-judge-rules/>.

<sup>28</sup> Evidence suggests that, relative to City-wide incentives, neighborhood-specific landlord incentives are more effective in moving families to higher-opportunity neighborhoods, which can improve children's longer-term outcomes.

See:



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Robert Collinson and Peter Ganong, "How do changes in housing voucher design affect rent and neighborhood quality?," *American Economic Journal: Economic Policy* 10, no. 2 (2018): 62-89.

Raj Chetty, Nathaniel Hendren, and Lawrence F. Katz, "The effects of exposure to better neighborhoods on children: New evidence from the moving to opportunity experiment," *American Economic Review* 106, no. 4 (2016): 855-902.

<sup>29</sup> Ibid. Collinson and Ganong's research also suggests that City-wide incentives would simply benefit the landlords who are already participating in the program, without broadening the pool of participating landlords.

<sup>30</sup> Raj Chetty, Nathaniel Hendren, and Lawrence F. Katz, "The effects of exposure to better neighborhoods on children: New evidence from the moving to opportunity experiment."

<sup>31</sup> Elizabeth Linos, Krista Ruffini, and Stephanie Wilcoxon, "Reducing burnout and resignations among frontline workers: A field experiment," *Journal of Public Administration Research and Theory* 32, no. 3 (2022): 473-488.

<sup>32</sup> Wendy L Awa, Martina Plaumann, and Ulla Walter, "Burnout prevention: A review of intervention programs." *Patient education and counseling* 78, no. 2 (2010): 184-190.

<sup>33</sup> Marilyn Rantz et al. "Randomized multilevel intervention to improve outcomes of residents in nursing homes in need of improvement." *Journal of the American Medical Directors Association* 13, no. 1 (2012): 60-68.

<sup>34</sup> Janet Tucker and UK Neonatal Staffing Study Group, "Patient volume, staffing, and workload in relation to risk-adjusted outcomes in a random stratified sample of UK neonatal intensive care units: a prospective evaluation," *The Lancet*, 2002, 359(9301), pp.99-107.

<sup>35</sup> John R. Bowlblis and Amy Restorick Roberts, "Cost-effective adjustments to nursing home staffing to improve quality," *Medical Care Research and Review* 77, no. 3 (2020): 274-284.

<sup>36</sup> Natalia Emanuel and Emma Harrington, "The Payoffs of Higher Pay," Working Paper, January 12, 2022, [https://scholar.harvard.edu/files/nataliaemanuel/files/emanuel\\_jmp.pdf](https://scholar.harvard.edu/files/nataliaemanuel/files/emanuel_jmp.pdf).

<sup>37</sup> Andy Newman, "Nearly 2,600 Apartments for Mentally Ill and Homeless People Sit Vacant," *The New York Times*, 4 Nov. 2022, <https://www.nytimes.com/2022/11/04/nyregion/nearly-2600-apartments-for-mentally-ill-and-homeless-people-sit-vacant.html>.

<sup>38</sup> In its Housing New York Plan, only 25% of units are affordable to households below 50% of AMI – the "extremely low" and "very income" categories – despite that about half of NYC renters fall into these categories.

See:

NYC HPD, "Housing New York 2.0" (New York: NYC HPD, accessed April 3, 2023), <https://www.nyc.gov/assets/hpd/downloads/pdfs/about/housing-new-york-2-0.pdf>.

Sarah Internicola and Lucy Block, "New York City's AMI Problem, and the Housing We Actually Need," Association for Neighborhoods and Housing Development, September 19, 2022, accessed April 3, 2023, <https://anhd.org/report/new-york-citys-ami-problem-and-housing-we-actually-need#ftn1>.

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<sup>39</sup> David Brand, "Empty Rent-Stabilized Units in NYC Decreased This Year as Warehousing Debate Rages," *City Limits*, November 17, 2022, accessed March 29, 2023. <https://citylimits.org/2022/11/17/empty-rent-stabilized-units-in-nyc-decreased-this-year-as-warehousing-debate-rages>.

## **APPENDIX B**

<sup>40</sup> MLRI, "Federal Poverty Guidelines - 2023," Mass Legal Services, accessed April 3, 2023, <https://www.masslegalservices.org/content/federal-poverty-guidelines-2023>.

<sup>41</sup> NYC Department of Social Services, "CityFHEPS Frequently Asked Questions," accessed on April 3, 2023, <https://www.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/dss-7n-e.pdf>.

<sup>42</sup> Ibid.

## **APPENDIX C**

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<sup>49</sup> "FY2022 MAYOR'S MANAGEMENT REPORT," pg. 236.

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<sup>52</sup> David Brand, "What Would NYC Look Like Without Right to Shelter? Bleak, Say the People Who've Needed It," *City Limits*, September 20, 2022, <https://citylimits.org/2022/09/20/what-would-nyc-look-like-without-right-to-shelter-bleak-say-the-people-who-needed-it/>.

<sup>53</sup> San Francisco Government, "City Performance Scorecards - Homeless Population", accessed April 3, 2023, <https://sfgov.org/scorecards/safety-net/homeless-population>.

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<sup>55</sup> New York City Independent Budget Office, "Adams Increases Funds for Homeless Shelters, But More Needed for Shelters & Other Programs," March 2022, <https://ibo.nyc.ny.us/iboreports/adams-increases-funds-for-homeless-shelters-but-more-needed-for-shelters-and-other-programs-fopb-march-2022.pdf>.

<sup>56</sup> "Testimony of Molly Park, First Deputy Commissioner, Department of Homeless Services, Before the New York City Council, Committee on Oversight and Investigations and Committee on General Welfare Oversight Hearing: The City's Audit of Shelter Providers," April 30, 2021, accessed April 3, 2023, [https://www.nyc.gov/assets/dhs/downloads/pdf/testimony/DSS-Testimony\\_Audit-of-Shelter-Providers-4.30.2021.pdf](https://www.nyc.gov/assets/dhs/downloads/pdf/testimony/DSS-Testimony_Audit-of-Shelter-Providers-4.30.2021.pdf).

<sup>57</sup> Data provided from DSS in response to a Freedom of Information Law (FOIL) request.

<sup>58</sup> Noah M Kazis. "The failed federalism of affordable housing: Why states don't use housing vouchers." *Mich. L. Rev.* 121 (2022): 221.

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<sup>60</sup> Jeanmarie Evelly and David Brand, "Here's How NYC's \$101 Billion Budget Addresses Homelessness," *City Limits*, June 14, 2022, accessed April 3, 2023, <https://citylimits.org/2022/06/14/heres-how-nycs-101-billion-budget-addresses-homelessness/>.

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## APPENDIX D

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<sup>68</sup> Patrick Markee, "The Revolving Door Keeps Spinning," *Coalition for the Homeless*, December 28, 2013, <https://www.coalitionforthehomeless.org/wp-content/uploads/2014/06/PolicyBrief-RevolvingDoorKeepsSpinning2013.pdf>.

<sup>69</sup> "Committee Report of the Legislative Division: Oversight: The CityFHEPS Rental Assistance Program."

<sup>70</sup> Kazis, Noah M. "The failed federalism of affordable housing: Why states don't use housing vouchers." *Mich. L. Rev.* 121 (2022): 221.

## **APPENDIX E**

<sup>71</sup> Summary of New Destiny Model is primarily based on author's interview with Catherine West of Enterprise Community Partners on January 11, 2023. New York City has contracted Enterprise to implement the CBO Landlord Connector program, which involves overseeing New Destiny and others.

<sup>72</sup> Summary of Stonewall CDC model is based on author's interview with Sayief Leshaw and Paul Nagle on Wednesday March 15, 2023, as well as subsequent email correspondence.

<sup>73</sup> Author's email correspondence with Sayief Leshaw, Program Director of Stonewall CDC, March 23, 2023.

## **APPENDIX F**

<sup>74</sup> Josh Leopold, "Innovations in NYC Health & Human Services Policy: Street Homelessness and Supportive Housing," *Urban Institute*, February 2014, <https://www.urban.org/sites/default/files/publication/32661/413059-Innovations-in-NYC-Health-and-Human-Services-Policy-Street-Homelessness-and-Supportive-Housing.PDF>.

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<sup>76</sup> Christin Durham and Martha Johnson, "Innovations in NYC Health & Human Services Policy: Homelessness Prevention, Intake, and Shelter for Single Adults and Families," *Urban Institute*, February 2014. <https://www.urban.org/sites/default/files/publication/32871/413060-Innovations-in-NYC-Health-and-Human-Services-Policy-Homelessness-Prevention-Intake-and-Shelter-for-Single-Adults-and-Families.PDF>.

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## **APPENDIX G**

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