



Testimony of

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*Oversight: DHS' HomeBase Study*  
*Int. No. 395: A Local Law to amend the administrative code of the city of New York, in*  
*relation to requiring DHS and HRA to track and report to the Council certain data*  
*regarding rental assistance programs for the homeless*

Before the  
New York City Council  
General Welfare Committee

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Good afternoon. I am Stephanie Gendell, the Associate Executive Director for Policy and Public Affairs at Citizens' Committee for Children of New York, Inc. (CCC). CCC is a 67-year old independent child advocacy organization dedicated to ensuring that every New York City child is healthy, housed, educated and safe.

I would like to thank Chair Palma and members of the General Welfare Committee for holding today's hearing regarding the Department of Homeless Services' (DHS's) study of HomeBase and Local Law 395, which would require DHS and HRA to track and report certain data to the Council regarding rental assistance programs for the homeless. CCC also thanks Council Member Palma, Public Advocate de Blasio, and Council Members Brewer, Chin, Dromm, Ferreras, Fidler, Foster, James, Koslowitz, Lander, Mark-Viverito, Sanders, Jr., Williams, Rodriguez, Rose and Halloran for introducing Local Law 395.

On November 27, 2010, there were 36,654 New Yorkers living in the shelter system. Notably, this includes almost 15,000 children (living with almost 11,000 adults) in the families with children shelter system. As we know, the economic downturn led to a tremendous increase in joblessness and homelessness in New York City, which was compounded by the freeze on Section 8 vouchers.

To try to combat the level of homelessness in New York City, the Department of Homeless Services (DHS) secured \$74.17 million in economic stimulus funding that was allocated directly to DHS. According to the City's Stimulus Tracker this stimulus funding is allocated for families as follows: \$39.93 million for HomeBase Homelessness Prevention; \$2.6 million for an aftercare helpline; \$2.1 million for anti-eviction legal services; \$9.7 million for expedited rehousing; and \$333,0000 for rapid rehousing of youth. CCC applauds DHS and the Mayor's Office their work in securing these critical funds.

In addition, to try to address the loss of Section 8 vouchers as a means for families to achieve permanent housing after living in the shelter system, the City has developed its own local subsidized housing programs—first Housing Stability Plus (HSP) and then Advantage.

While CCC appreciates the efforts DHS has made to secure stimulus funds and develop these local subsidies, we have multiple concerns about the following:

- the numbers of children displaced from their homes and communities,
- the effectiveness of HomeBase and the method being used to evaluate the program,
- the ability of families participating in Advantage to be able to pay their rental share during their two years in the program and the ability for these families to remain in permanent housing when the subsidy ends, and
- the elimination of the Children's Advantage program for families with child welfare history.

### DHS's HomeBase Study

CCC believes that a programmatic evaluation of HomeBase, which develops a demographic profile of families assisted by the program, identifies the specific services provided to families, and determines the efficacy of the intervention, would be invaluable to assess the role of HomeBase in preventing homelessness in New York City. CCC has long believed that understanding more about what services or interventions HomeBase is providing and whether the program is preventing homelessness would be critical given the amount of resources the City has committed to this program. On the other hand, CCC is very concerned about the methodology being used in DHS's study of HomeBase. As you know, 200 families found eligible for HomeBase services have received letters telling them that they will not participate in the initiative because they are part of the control group and that they were not chosen in the "lottery."

CCC is very concerned about the methodology employed by DHS and the evaluators with which DHS contracted. Notably, CCC does not believe that it is ethical to find poor, mostly minority families eligible for a service that could help spare them the trauma and instability caused by becoming homeless, but then tell them they cannot receive the service because they are in a control group. This is particularly true if the families were not truly given the ability to decide whether to consent to participate. Given the circumstances facing these families, CCC does not believe that there could have been informed consent to be a human subject in a study if there was no other way to receive HomeBase services but to sign such the consent form. While we understand the scientific value of randomized controlled experiments, we would argue that when a study has very real and potentially harmful impacts on human subjects (in this case parents and children who are in the control group) other methodological approaches should be explored more fully.

To that end, in 2008-2009, CCC began background research in preparation for our own qualitative assessment of HomeBase. We had hoped to collect data on participant demographics and program experiences through survey interviews of providers and focus groups with families that participated in HomeBase. Over several months, we reviewed DHS data, policies and procedures and conducted background interviews with HomeBase providers, shelter providers and DHS staff. We also developed a draft survey instrument that was shared with DHS. Our intent was to conduct a qualitative analysis of the program and then to issue a report similar to what CCC has recently completed for child welfare preventive services.

While CCC met with DHS staff in the summer of 2008 and held a fall 2008 policy briefing on HomeBase that DHS staff participated in, when we met with DHS in early 2009 to share our draft survey instrument, the agency expressed many concerns with our project. Specifically, DHS explained that they did not believe that CCC's work was necessary since they about to undertake their own study of HomeBase and would be engaging an academic institution as the evaluator. Furthermore, they suggested that CCC would be unable to administer our qualitative survey of HomeBase providers without first going through the agency's IRB (Institutional Review Board) process. While CCC continued to believe in the value of our study, we were aware that it would be very time-consuming to go through DHS's IRB process and we did not believe this should be necessary to interview providers. That said, we did not want to go forward, fearing this would be the providers in a precarious position given their contracts with DHS. In addition, we believed going through the IRB process would likely be fruitless since DHS was moving forward with their own evaluation of the program. Clearly, CCC was very disappointed that we were unable to complete our qualitative analysis.

Lastly, it is our understanding that DHS's HomeBase study will only monitor whether or not the 200 families in the control group (and the 200 families receiving HomeBase services) go to PATH seeking shelter over the next two years. We urge DHS to reach out to the 200 families that were turned away from HomeBase to find out where they are living now, whether they and their children are living in a safe environment and to assess whether the family is still in need of HomeBase services—and if so, to provide them.

Local Law 395:

CCC supports Local Law 395 and the requirements it would create for DHS and HRA to track and report certain data to the Council with regard to families that have left shelter to various rental assistance programs. CCC also recommends that DHS track and report on data related to all of those who have re-entered shelter in order to understand what occurred between the time they left shelter and their return to shelter. Taken together, this data would be invaluable to understanding whether the Advantage housing subsidy assistance family is working, the characteristics of families assisted by various programs that are successful/unsuccessful, and to further hone the models to meet the needs of families.

DHS's data, provided in their *Critical Activities Report*, clearly show that most of the families with children that that left shelter in Fiscal Year 2010 (and July and August 2010) did so through one of the Advantage Programs. For example, in August 2010, 708 of the 823 families with children that exited shelter to permanent housing (86%) did so through Advantage. Notably, 176 of those families received Children's Advantage and 127 of those families received Fixed Advantage—programs no longer available to families.

Given the numbers of families leaving shelter to Advantage, it is imperative for the City to track these families and see whether the program is effective. Work Advantage assumes that after two years of assistance, families will be able to pay their rent without a subsidy to assist them, even though their rent is typically \$1000 per month and their family income is typically less than \$35,000 (according to DHS/HRA testimony and answers to questions on June 10, 2010.) While CCC understands the City's financial limits with regard to local subsidies, we must follow these families to see whether Advantage puts families on a pathway to independence or back to the shelter system.

Children's Advantage:

In addition, effective August 2010, DHS eliminated the Children's Advantage Program. CCC continues to have tremendous concerns about the impact this will have on children who have reunified from foster care. Children's Advantage was a housing subsidy assistance program developed specifically for families in which the children have been reunified from foster care and the family is living in a homeless shelter. Thus, the families participating in Children's Advantage are those where the city (ACS) and a Family Court Judge have determined that prior abuse or neglect of the children warranted the child's removal from his/her home, that the child would be in imminent risk of harm if he/she remained in the home, and that placement in foster care was in the child's best interests. Removal from home and placement in foster care is often a traumatic event for children and their parents. It impacts children's attachments to their parents and requires children to spend part of their childhood living in someone else's home.

While the court process can often take years due to an overburdened court system, the goal for many children in foster care is that they eventually return home to their parents. Foster care provide services to foster children in an attempt to meet the children's needs and make it safe for children to live with their parents again. Often times, these services include job training and

employment assistance for the parents. For the families participating in Children's Advantage, not only have the children been in foster care, but also when they return to live with their parents, they are living in a homeless shelter. Children's Advantage has been helping these families obtain permanent housing.

Eliminating Children's Advantage such that child welfare reunification families living in homeless shelters can only obtain permanent housing if a parent works is concerning to CCC. In addition, families currently participating in Children's Advantage do not have to pay rent (even if they are working), but in the new plan, these families will need to pay 30% of their gross monthly income for rent in the first year and 40% of their gross monthly income for rent in the second year.<sup>1</sup>

While CCC believes strongly in the value of work and the stability income can bring to a family, we worry that tying permanent housing to employment for child welfare families (and charging 30% or 40% of gross monthly income for rent) will result in more former foster children having to grow up living in homeless shelters, and even more concerning, may jeopardize the stability of some reunifications.

It is important to understand the challenges facing families who have been through the foster care system. The children have often experienced trauma associated with being removed from their homes and experiencing abuse and/or neglect, and often their parental attachments were disrupted while they were living in foster homes. The children often have a range of needs related to their mental health, education and development. Similarly the parents to whom they return also have many needs such as mental health issues and histories of domestic violence and/or substance abuse.

The elimination of Children's Advantage means that there will be additional stressors on these often fragile families, who are not only dealing with the child welfare system but are also struggling with homelessness. For many of the young children in these families, if their parents do indeed get a job to meet the requirements of Work Advantage, they will need to be placed in child care—meaning in the care of another stranger—at a time when the family is working to rebuild and strengthen their relationships to one another. (It also means that ACS will need to spend more money on child care vouchers even though ACS is already struggling to afford their current child care system.) Furthermore, the economic downturn has led to a significantly increased unemployment rate in New York City. Thus, it may be very difficult for parents to find jobs given the sheer number of people looking for jobs and the shortage of jobs created by the economic downturn. While work is often an asset to family functioning, CCC worries that the pressure on DHS and HRA to urge these fragile families experiencing both child welfare interventions and homelessness, to obtain employment as a precursor to permanent housing, may jeopardize the success of reunifications and the safety of the children. We urge the city to reconsider the elimination of Children's Advantage.

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<sup>1</sup> In fact, Work Advantage (which will subsume Children's Advantage) had only been charging families \$50 per month in the first year, but DHS has since changed Work Advantage to require a 30% gross monthly income contribution in the first year for all participating families. CCC is also concerned about this increased rent contribution requirement for all families participating in Advantage.

Finally, while not specifically related to the HomeBase study or Local Law 395, CCC thinks it is important to note that in the November Financial Plan, DHS proposes to reduce the broker's fee for Advantage. If this is implemented, it must also be closely monitored. If DHS shelter providers are unable to find housing stock for homeless families (due to the reduced broker's fees), fewer families will be able to exit shelter to permanent housing (and shelter providers will receive less funding due to their performance based rates.)

Thank you for this opportunity to testify. CCC appreciates the City Council's interest in these very critical issues.