



Public Comment by *Citizens' Committee for Children of New York* on

Where We Live NYC Draft Plan

Presented to the *NYC Department of Housing Preservation and Development*
and *New York City Housing Authority*

March 6, 2020

Where We Live NYC represents a critical accounting of the enduring legacies and existing realities of segregation and inequality in New York City. As a document promoting a vision to “remedy the scars of discrimination, segregation, and concentrated poverty,” the draft plan lays out a commendable framework for tackling the inequities that persist within and across the city's neighborhoods. The plan's effort to consider the weight of historically racist and exclusionary policies alongside the current landscape of inequality, and to present goals and solutions informed by data and participatory research is a course of action which is much appreciated at Citizens' Committee for Children of New York (CCC).

CCC is a 75-year-old independent, multi-issue child advocacy organization dedicated to ensuring that every New York child is healthy, housed, educated, and safe. CCC does not accept or receive public money, provide direct services, nor represent a sector or workforce. We document the facts, engage and mobilize New Yorkers, and advocate for solutions to make the city a better place for children and their families.

This public comment aims to build on the vision and project articulated in the draft plan, *Where We Live NYC*, and stresses that the plan must adequately center the experiences of New Yorkers experiencing homelessness – the majority of whom are families and children. The city cannot let this occasion pass without examining and **addressing with concrete action the acute crisis of children and families who lack secure housing**, in order to prevent another generation of New York's children from bearing the long-term consequences of growing up homeless.

If children and families experiencing homelessness are not at the forefront of this public reckoning and path forward, the city is bound to repeat the same practices that have perpetuated many of the inequities we still see today.

To begin with, New Yorkers experiencing homelessness are among the groups most impacted by the malignant forces which *Where We Live* seeks to redress. The role of housing discrimination,ⁱ unsafe living environments,ⁱⁱ segregated schools,ⁱⁱⁱ employment discrimination,^{iv} and other factors have a particularly detrimental impact on the lives of individuals experiencing homelessness, especially families with children.

At the end of Fiscal Year 2019, almost 12,500 families with children were sleeping in DHS shelters – up from 8,000 just eight years ago.^v Families with children make up almost 70% of the roughly 60,000 individuals in city shelters; among these families, more than half are children aged 13 years and younger, and as the draft plan notes, 95% of the heads of families with children in shelter were Black and Hispanic.^{vi} We know from additional data from the Department of Homeless Services that 69% of heads of families with children are single mothers.^{vii} Family homelessness is at the intersection of racial/ethnic and gender-based discrimination, and prior research from Citizens' Committee for Children has also made apparent that many of the communities with greater rates of shelter entry are the same areas that bore the brunt of government disinvestment over decades.^{viii}



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Overcoming these challenges will not happen overnight and does not fall solely on the current administration's shoulders. Mayor Bill de Blasio's goal to build 90 community-based shelters is an important step to mitigate the capacity and service limitations of the existing shelter system. Yet, the process of implementing this plan has invited prejudices to resurface, including residents viciously opposing the construction of neighborhood shelters.^{ix} This reveals how much work is still to be done to banish stigma toward fellow New Yorkers experiencing homelessness.

CCC has spent the last four years conducting community-based assessments in collaboration with residents and organizations that involved analyzing administrative data from a variety of government sources and speaking with hundreds of community members through a participatory, community-based process. To date, we have reported on community-based assessments in Brownsville, Brooklyn; Northern Manhattan; the North Shore of Staten Island; and Elmhurst and Corona, Queens.^x

While these communities are unique in many ways, across these assessments, residents voiced common concerns around housing affordability, overcrowded living conditions, rental housing in poor repair, and the crisis of family homelessness. These concerns overlap with findings outlined in the draft plan, while others provide greater context for what families need in the midst of the crisis of affordability and homelessness: the pressing demand for workforce development, reliable transportation options, high quality and affordable year-round supports for children (including early care and education, access to behavioral health care, afterschool and summer programs), and more information available in multiple languages about services and other supports during and prior to times of crisis.

In conversations with hundreds of service providers, caregivers, and youth, we learned that the supply of affordable housing remains woefully inadequate, and the fear of displacement lingers on the minds of many lower-income families. Residents of these neighborhoods also felt that more supports were necessary to address precarious housing situations *before* they reached the point of homelessness, and that the existing network of supports must be more widely publicized. Finally, our community conversations shed a light on different forms of housing insecurity beyond entry to shelter – most notably overcrowded rental conditions. Our conversations with residents and organizations in Elmhurst and Corona, Queens, shed light on this issue in a community where one in four households experience overcrowding. Repeatedly, residents and staff at child and family service providers shared details of the stressors that arise when multiple family members are living in one room. This phenomenon is sometimes described as living 'doubled up', and is increasingly common and accounts for the unacceptable growth in the number of public school students living in temporary housing.^{xi}

How can *Where We Live* integrate these perspectives and appropriately address the crisis of family homelessness through the lens of fair housing going forward? CCC appreciates the effort to involve community voices in this process, including that one in five of those who participated in the community conversations to develop this draft plan had experienced homelessness. The six goals described in the draft plan propose policies that we welcome and others which demand greater attention towards the needs of New Yorkers experiencing homelessness. The administration can and should strengthen its approach to housing equity in tandem with enhanced efforts to 'turn the tide' on the homelessness crisis, and specifically efforts to end family homelessness.



Invest in support services that reach families facing housing insecurity earlier to prevent shelter entry, promote child well-being for families experiencing housing instability, and strengthen post-shelter vouchers.

On any given night, there are more than 33,000 New York City public school students living in shelter. Further, housing instability affects more than 100,000 students in NYC over the course of a year, which can have severe, long-term negative effects on educational and life outcomes. Investments are needed to reach families experiencing housing instability much earlier. The Fiscal Year 2021 City Budget holds the potential to make meaningful investments in innovative solutions that coordinate community level supports to prevent shelter entry. Schools and city agencies other than the Department of Homeless Services can play a key role in coordinating resources to prevent family homelessness. Now is the time to invest in effective cross-agency and neighborhood-based coordination to reduce shelter entry for families with children.

To this end, the Family Homelessness Coalition (FHC), of which CCC is a lead organization, supports a \$3M City Council initiative to address the link between housing instability and chronic absenteeism in NYC public schools. According to Department of Education data, students living in shelter are at considerably greater risk of being chronically absent.^{xii} These students are also twice as likely to repeat a grade, be suspended or expelled, or drop out of high school.^{xiii} For these reasons, FHC proposes to pilot and evaluate a homelessness upstream prevention strategy across three targeted neighborhoods (to be identified) that uses best practices in cross-agency coordination and community-based service delivery to improve housing stability and prevent shelter entry for students in unstable housing. More initiatives like these deserve support in the City's budget.

Additionally, to improve housing stability, CCC and its partners support increasing the value of much-relied upon CityFHEPS vouchers. *Intro 146*, sponsored by Council Member Stephen Levin, can be a vehicle to achieve this goal – aiming to raise voucher amounts to 100% of Fair Market Rent.^{xiv} This measure could go a long way in mitigating source of income discrimination too often faced by families trying to exit shelter.

Involve to a greater degree non-governmental organizations as implementing partners.

Programs like Universal Access to Counsel (UAC) offer a vital support structure to low-income tenants, and we are encouraged to see data supporting the beneficial impact that UAC has had.^{xv} Still, as the initiative expands to other zip codes, many residents remain unaware of their eligibility. This underscores a theme emerging from CCC's community-based assessments: information needs to be widely communicated, in linguistically and culturally appropriate fashion, for new initiatives and supports to realize their purpose.

For example, a recent survey from the Family Homelessness Coalition found that 59% of survey respondents did not know or hear about prevention services, such as Homebase, before entering shelter.^{xvi} Non-governmental community-based organizations are well-positioned to share information on and connect families experiencing housing insecurity with homelessness prevention and other initiatives with the appropriate support and coordination of city agencies.

In addition, we question the plan's understanding of 'amenity-rich neighborhoods,' which seems to conflate amenities with wealth. It is not necessarily the case that lower-income neighborhoods lack amenities and institutions, and that low-income residents need to move to wealthier neighborhoods to thrive. Rather, it is essential that resources and amenities in low-income communities can *meet the on-the-ground needs of families*. Our recent report *Child and Family Well-being in New York City* measures the existence of key housing services in communities experiencing greater risk of housing insecurity – highlighting, for



example, that a Homebase site is longer present in Morrisania, where nearly 500 families with children were residents prior to living in shelter in 2017.^{xvii}

The call for equitable investments in communities that have borne the brunt of segregation and discrimination is appropriately a priority and should therefore be accompanied by attentive efforts to support community-based resources in low-income areas to fulfill this goal. These resources include housing support services, such as Homebase, as well as a range of resources that facilitate community development but which are insufficiently available – such as child care, afterschool and summer programming, behavioral health services, and other family and community supports offered in non-stigmatizing, intergenerational settings.

Combat housing discrimination and exploitation in all forms – including families transitioning from shelter to permanent housing, as well as immigrant families who are forced into severely overcrowded conditions.

Among the strategic goals outlined in the *Where We Live* draft plan, we want to amplify the call for further investigation of the barriers New Yorkers face to finding and remaining in affordable housing.

In particular, we want to underscore the concern regarding discrimination against vouchers used by individuals who are exiting shelter. Earlier this week, the Family Homelessness Coalition released a short film, *Portraits of Hope*, that documents the realities of family homelessness.^{xviii} The film profiles six women who have faced homelessness at different stages of their lives and generously shared their personal stories. Among these stories is evidence that reinforces the known challenges and discrimination families face when applying rental housing vouchers. There is ample evidence to act swiftly and prudently to tackle these barriers.

We also call attention to the situation of families with children who are limited to renting a single room of an apartment. In numerous conversations in Elmhurst and Corona, families and service providers reinforced findings from public data on the increasingly common circumstance of families and children living ‘doubled up’ across the city. These community members also revealed instances in which families would only be able to afford a single room in a housing unit, and that landlords would reject prospective tenants with young children. This is a different manifestation of housing insecurity and exploitation that demands greater enforcement and measurement from city agencies.

Relatedly, ongoing and improved measurement and monitoring remain critical to stopping this crisis.

The draft plan notes the importance of the triennial NYC Housing and Vacancy survey in monitoring housing conditions. Expanding the frequency and geographic granularity would enrich public knowledge and analysis of housing conditions. Ideally, the survey might be conducted with greater frequency (biennially), with a larger sample to produce reliable estimates for all sub-borough areas, and specific questions about affordability and displacement – as well as overcrowded and doubled up conditions – will be essential to capturing the prevalence and depth of housing insecurity reported by residents.

Separate from this effort, key indicators of the housing crisis and family homelessness are no longer available, such as the number of families with children entering shelter by their last community district of residence. This information is vital for program planning and outreach efforts for organizations working locally to support families facing housing insecurity. Further, data must be disclosed on the conditions, length of stay, and demographics of the shelter population based on the facility type in which they stay – as well as the breakdown of shelter exits by voucher and housing type. CCC has submitted multiple FOIL requests from the Department of Social Services to solicit these data, but having them publicly available on



a regular basis would help identify areas for improvement in our shelter system and ensure viable pathways to permanent housing.

Goals and findings from CCC's community-based assessments overlap with goals from *Where We Live NYC*, including to make equitable investments to address the neighborhood-based legacy of discrimination, segregation, concentrated poverty, and family homelessness.

If families and children experiencing homelessness are not at the forefront of this public reckoning and path forward, the city is bound to repeat the same practices that have perpetuated many of the inequities we still see today. The administration can and should strengthen its approach to housing equity in tandem with enhanced efforts to 'turn the tide' on the homelessness crisis, and specifically efforts to end family homelessness.

What is needed is new and continued funding to act on family homelessness and efforts that support low-income families facing housing insecurity, as well as targeted collaboration with non-governmental organizations to expand awareness and meet service demands in low-income communities. There is ample evidence that discrimination and exploitation persist in the housing market, and initiatives to combat these barriers should be accompanied by expanded data collection and disclosure so that advocates and agencies can work together to end the crisis of family homelessness in New York City.

We thank Deputy Mayor Vicki Been, the NYC Department of Housing Preservation and Development and New York City Housing Authority for the opportunity to comment on the draft plan.

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ⁱⁱ Office of the Comptroller of New York City. (2019). *Housing Survivors: How New York City Can Increase Housing Stability for Survivors of Domestic Violence*. Retrieved from: <https://comptroller.nyc.gov/reports/housing-survivors/>.

ⁱⁱⁱ Hill, K. and Mirakhur, Z. (2019). "Where Are NYC Schools Serving the Highest Concentrations of Homeless Students?" *The Research Alliance for New York City Schools*. Retrieved from: https://research.steinhardt.nyu.edu/site/research_alliance/2019/09/06/where-are-nyc-schools-serving-the-highest-concentrations-of-homeless-students/.

^{iv} Golabek-Goldman, S. (2017). "Ban the Address: Combating Employment Discrimination Against the Homeless." *The Yale Law Journal*, 126:1788-1868.

^v City of New York. (2019). Mayor's Management Report. Retrieved from: <https://www1.nyc.gov/site/operations/performance/mmr.page>.

^{vi} Department of Homeless Services. *DHS Data Dashboard Tables FY 2019*. Accessed 1 February 2020 at: <https://www1.nyc.gov/site/dhs/about/stats-and-reports.page>.

^{vii} Coalition for the Homeless. (2019). *Profiles of Families with Children in Shelter*. Unpublished data.

^{viii} Citizens' Committee for Children of New York. (2017). *Keeping Track of Family Homelessness in New York City*. Retrieved from: cccnyc.org/wp-content/uploads/2017/08/CCCKeepingTrackofFamilyHomelessness.pdf.

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^x Citizen's Committee for Children. Brownsville, Brooklyn (2017) <https://www.cccnyc.org/data-and-reports/publications/brownsvilleassets/>. Northern Manhattan (2018) <https://www.cccnyc.org/data-and-reports/publications/celebrating-strengths-addressing-needs-community-driven-solutions-to-improve-well-being-in-northern-manhattan/>. The North Shore of Staten Island (2018) <https://www.cccnyc.org/data->



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- ^{xii} New York City Independent Budget Office. (2017). Testimony of Lisa Pappas to the New York City Council Committees on Education and General Welfare on Support for Homeless Students. Retrieved from: <https://ibo.nyc.ny.us/iboreports/student-in-temporary-housing-testimony-october-2017.pdf>.
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