



**Public Comments on behalf of Volunteers of America- Greater New York
HRA Rules Public Hearing on the CityFHEPS Prospective Rule Change
To Discontinue Unit Hold Incentives
Held on November 5th, 2025**

Introduction

My name is Eric Lee, Director of Public Policy for Volunteers of America-Greater New York (VOA-GNY). We are the local affiliate of the national organization, Volunteers of America, Inc. (VOA). VOA-GNY is a 129-year-old anti-poverty organization that aims to end homelessness in Greater New York through housing, health and wealth building services. We are one of the region's largest human service providers, with a robust portfolio of supportive and affordable housing, and we are a homeless services and shelter provider serving families with children, working individuals, survivors of domestic violence and people experiencing street homelessness.

CityFHEPS Rule Change Concerns:

VOA-GNY, as a provider of both homeless services and affordable housing, strongly opposes the proposed rule change to CityFHEPS to discontinue Unit Hold payment incentives for landlords renting to CityFHEPS voucher holders. This rule change will negatively impact households in shelter trying to use the voucher to secure permanent housing, as it creates a financial disincentive for landlords, resulting in longer housing searches and fewer households moving out of shelter.

Without a unit hold incentive, rental assistance vouchers must be processed and approved as quickly as the paperwork of a cash-in-hand tenant to remain competitive. As DSS Commissioner Park notes, "The hardest part about using a CityFHEPS voucher is the city has a 1.4 percent vacancy rate. There's 13,000 households in shelter right now, who have... a shopping letter, and who haven't found a place"¹. These 13,000 households are competing against exponentially more private renters for very few vacant units. While non-vouchered households could sign a lease and move in within the same week of seeing an apartment, it takes several weeks to months for CityFHEPS voucher holders to move into housing, given the numerous additional documents, inspections, possible revisions, and non-electronic initial payments the process entails. The unit hold fee is crucial to give HRA time to process these steps, as it pays the landlord 30 days' worth of rent to hold the unit.

Even with this financial incentive, shelter residents have lost housing opportunities after landlords walked away due to processing delays. Housing specialists must convince landlords to resubmit new leases with start dates one month later if the application is not approved by

¹ Patrick Spauster, "The Building was Supposed to be Luxury Apartments. Now It Will House 183 Families from Homeless Shelters," *City Limits*, October 29, 2025. <https://citylimits.org/this-building-was-supposed-to-be-luxury-apartments-now-it-will-house-183-families-from-homeless-shelters/>



the 20th of the month (e.g., a lease with a Nov. 1st move-in date must be changed to Dec. 1st if HRA does not approve the CityFHEPS package by Oct. 20th.), and elimination of the unit hold fee will make this proposition even less palatable.

VOA-GNY appreciates DHS' efforts to work with shelter providers to streamline the CityFHEPS application process, but the unit hold fee must be maintained to account for processing time of the lengthy process. Thanks to the hard work of the administration and providers, CityFHEPS is New York's most effective tool for helping people exit shelter and attain permanent housing, and we urge the City to maintain the unit hold fee which is essential to the success of the CityFHEPS program.