



**Public Comments on behalf of Volunteers of America-Greater New York
HRA Rules Public Hearing Concerning CityFHEPS and Pathway Home Rule Amendments
Held on May 30th, 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 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 increase the tenant rental share from 30% to 40% for households with earned income who are renewing with good cause beyond their fifth year in the program. **New York City should not rent-burden low and extremely low-income households, forcing them to pay 40% of their gross income towards rent, to save the city an estimated \$11 million per year¹.**

The CityFHEPS voucher is an essential tool for VOA-GNY's homeless services programs, which we use to help families with children, single adults, and survivors of domestic violence move to permanent housing. Our residents work hard to earn enough to qualify for CityFHEPS and pay for their necessities, while trying to keep their income under 200% of the Federal Poverty Limit to qualify for the voucher. Single-adults particularly, due to their small household size, can easily earn too much to qualify for the program. The City's recent income limit increase for renewals up to 80% of the Area Median Income gives households greater ability to earn more without fear of losing their housing, but this proposed change is a step backwards. Our residents who can work find jobs in retail and the service industry earning minimum wage, and a full-time job working 35 hours a week pays just over \$30,000 a year. Taking 10% more of their gross income means they would be left with only \$18,000 before taxes to cover all other living expenses for a year!

¹DSS Commissioner Molly Park's testimony before the NYC Council Committees on Finance and General Welfare May 16th, 2025. FY26 NYC Council Executive Budget Hearing.

<https://legistar.council.nyc.gov/MeetingDetail.aspx?ID=1302695&GUID=E6461702-7344-4251-9A13-7453F2F1D90E&Options=info|&Search=#>



While it's heartening to hear that the City is granting good cause extensions to 90% of working households beyond year 5 in the program, that means there will be a significant number of households impacted by this rental share increase. This rule change will not help them to transition off the program. It will instead take a significant amount of money out of the pockets of households who are already struggling to meet their daily living expenses and make it more difficult for them to maintain their housing and avoid homelessness. Rent-burdened tenants must make hard choices which expense to pay, rationing their prescriptions or food to make do with less, or falling into debt either because of unforeseen healthcare or other unplanned expenses or simply not earning enough to cover necessities.

This rule change does not make sense, either from a humane or a cost-savings perspective. Maintaining stable housing is fundamental to so many other critical health outcomes including managing physical and mental health needs, maintaining stable employment, and higher school attendance and graduation rates. **If just *one percent* of households using CityFHEPS for five or more years returns to shelter, in addition to retraumatizing the household and disrupting multiple facets of their lives, the projected cost-savings would also be cancelled out by the cost to shelter them.²**

I urge the City to reconsider changing the CityFHEPS rule. New York should not rent-burden formerly homeless families and individuals who rebuilt their lives. In doing so, it will drive them towards debt and financial instability.

² Samuel Stein, Oksana Mironova, Debipriya Chatterjee, Jennifer Hinojosa, Yvonne Pena, May 2024. *The City's Rent Hike Plan for Voucher Holders Will Backfire*. Community Service Society.
<https://www.cssny.org/publications/entry/the-citys-rent-hike-plan-for-voucher-holders-will-backfire>