



November 24, 2014

Human Resources Administration  
180 Water Street  
New York, NY 10038

Re: HRA's LINC Rental Assistance Programs

Dear Mr. Banks,

Thank you for the opportunity to submit comments on the LINC Proposed Final Rule (Rule). On behalf of Single Stop, we respectfully submit these comments and recommendations for your consideration and exploration.

Single Stop is a national nonprofit organization dedicated to helping low-income families and individuals build economic security by securing access to resources such as free tax preparation, legal services, financial counseling, and public benefits. In addition, Single Stop partners with organizations throughout New York City, such as Center for Urban Community Services (CUCS), Win, BronxWorks, Good Shepherd Services, and Henry Street Settlement that offer supportive housing programs to clients. Particularly, *Home to Stay*, which helps homeless families in New York City rapidly obtain housing and provides supportive services so that they maintain their homes, connects clients to our Single Stop sites as part of the program's strategy to stabilize the household. Additionally, Single Stop's partners collaborate with *Homebase*, which provides services such as mediation, household budgeting, rental assistance, job training, and benefits advocacy to help prevent homelessness.

Single Stop commends HRA for recognizing the need to relocate families with children from the city's shelter system to stable housing. The New York City Department of Homeless Services (DHS) census from November 20, 2014 indicates that there were 58,477 individuals in the shelter system, and 42,633 of these people were members of families with children.<sup>1</sup> Housing insecurity among children has been linked to poor social development and worse academic outcomes. Moving multiple times in childhood can lead to lower reading and math skills, and greater risk-taking, argumentative, and disobeying behaviors.<sup>2</sup>

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<sup>1</sup> NYC Department of Homeless Services Daily Report. 20 Nov. 2014.

<http://www.nyc.gov/html/dhs/downloads/pdf/dailyreport.pdf>.

<sup>2</sup> Sandstrom, Heather, and Sandra Huerta. "The Negative Effects of Instability on Child Development: A Research Synthesis." Urban Institute. Sept. 2013. <http://www.urban.org/UploadedPDF/412899-The-Negative-Effects-of-Instability-on-Child-Development.pdf>.

**Single Stop USA**

1825 Park Ave, Suite 503 ♦ New York, NY ♦ 10035

Phone: (212) 480-2870 ♦ Fax: (212) 480-2871

[www.singlestopusa.org](http://www.singlestopusa.org)



As such, it is vital to provide families with limited resources the opportunity to live in stable, affordable housing. Rental assistance is a key resource for low-income families that helped keep 3.1 million people in the U.S. out of poverty in 2013.<sup>3</sup> Single Stop applauds New York City's effort to create new rental assistance programs that will assist nearly 4,000 families become housed at a time when other housing programs are being scaled back.

For example, the federally-funded Section 8 Housing Choice Voucher Program that provides rental assistance to low-income people who locate housing in the private market, is serving fewer New Yorkers. New York City runs the largest Section 8 program in the country<sup>4</sup>, with 91,103 units. The level of federal funding for this program is currently uncertain because Congress has not acted to pass an appropriations bill, and federal government agencies are currently being funded by a continuing resolution passed on September 17, 2014 that will keep programs funded through December 11, 2014. The New York City Housing Authority (NYCHA) projects that because of Congressional funding decreases, from 2015-2018, federal funding will be appropriated at approximately 77% of NYCHA's eligibility, a deficit of about \$230 million per year.

A lack of available funding prohibits new vouchers from being issued, including the re-issuing of vouchers being returned as tenants leave the program. In NYCHA's PHA Agency Plan for fiscal year 2015, NYCHA asserts that the Section 8 waiting list will remain closed with no new vouchers issued except in very limited circumstances. Moreover, the total number of vouchers is decreasing. Approximately 3,000 vouchers were lost in New York City in 2014, and in 2015, the total number is projected to decrease further to 88,000.<sup>5</sup>

Federal funding for public housing faces similar uncertainty, and there are currently over 160,000 applications on NYCHA's public housing waiting list.<sup>6</sup> In this environment, new programs that will help house working families, vulnerable families, and domestic violence survivors are needed and welcome. We also applaud HRA's efforts to provide supports including moving expenses, security deposits, broker's fees, and emergency rent assistance and arrears.

As HRA considers the new Rule and its implementation, Single Stop urges you to consider the following:

**Recommendation #1:** Tie the income limit required for continued eligibility at the time of renewal to reflect to a self-sufficiency standard.

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<sup>3</sup> Fischer, Will. "Rental Assistance Kept Over 3 Million People Out of Poverty Last Year, New Census Data Show." *Off the Charts Blog*. Center on Budget and Policy Priorities, 16 Oct. 2014. <http://www.offthechartsblog.org/rental-assistance-kept-over-3-million-people-out-of-poverty-last-year-new-census-data-show>.

<sup>4</sup> *Section 8 Assistance*. <http://www.nyc.gov/html/nycha/html/section8/section8.shtml>.

<sup>5</sup> "FINAL – PHA Agency Plan." New York City Housing Authority, 20 Oct. 2014. [http://www.nyc.gov/html/nycha/downloads/pdf/FY2015\\_NYCHA\\_Annual%20Plan\\_Final.pdf](http://www.nyc.gov/html/nycha/downloads/pdf/FY2015_NYCHA_Annual%20Plan_Final.pdf).

<sup>6</sup> *Applying for Public Housing*. <http://www.nyc.gov/html/nycha/html/assistance/generalfaq.shtml>.

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**Analysis:** The Rule requires that a household have an income limit of 200% of the Federal Poverty Level (FPL) at each renewal for all of the LINC programs. A possible unintended consequence of this provision is that it will provide a disincentive for families to increase their income over the five years they are eligible for the program out of fear of losing their housing. In order to avoid this, Single Stop recommends linking the income limit required for renewal to the average cost to rent a market-rate apartment, using a self-sufficiency standard.

**Recommendation #2:** Extend the time limits for the LINC programs and build in other measures that ensure greater security for LINC families.

**Analysis:** The Rule permits four one-year renewals for LINC II and LINC III. It also permits two one-year renewals for LINC I, with two more renewals permitted on a case-by-case basis. Because of the time-limits imposed on the LINC programs, they lack the built in security for families that programs like Section 8 and public housing have. Single Stop encourages HRA to extend the time limits for these programs and to build in further measures to help ensure that LINC families maximize their time on the LINC program and do not cycle back into the shelter system once they are ineligible for further renewals. For example, in addition to increasing the income limits as recommended above, HRA should take measures to ensure that any outstanding issues related to Public Assistance eligibility and compliance may be resolved at the time of renewal before LINC subsidies are revoked. By taking these types of actions, HRA will ensure that the LINC programs meets both of their goals: moving families from the shelter system and providing stable housing.

**Recommendation #3:** Maximize the integration of supportive service such as Home to Stay, Homebase, and Single Stop to ensure long-term stability.

**Analysis:** In order to be eligible for renewal under LINC I, participants must be engaged in employment and social service supports, and for LINC II renewals, participants must be engaged in ongoing case management to obtain employment or secure benefits. LINC III has similar requirements "where such activities are made available." As programs like Home to Stay and Homebase are integrated into the LINC program so that clients can receive these required supports, Single Stop urges HRA to make the programs as widely available as possible so that clients are able to have access to a full range of supports and services available to them. Single Stop is proud to assist in that effort to help ensure long-term financial and housing security.

Again, we appreciate the opportunity to comment on the HRA's LINC Rental Assistance Programs.

Sincerely,

Andrew Stettner  
Chief Program Officer  
Single Stop USA

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