

Testimony by the New York Legal Assistance Group on
Int 0139-2026, Int 0232-2026, T2026-1352, T2026-1353 and T2026-0008

Before the New York City Council Committee on General Welfare

March 9, 2026

Chair Hudson, Council Members, and staff, good morning and thank you for the opportunity to speak to the New York City Council on the oversight of NYC's Code Blue operations. My name is Graham Horn, and I am a Coordinating Attorney with the Shelter and Economic Stability Project in the Public Benefits Unit at the New York Legal Assistance Group (“NYLAG”).

NYLAG uses the power of the law to help New Yorkers experiencing poverty or in crisis combat economic, racial, and social injustices. We address emerging and urgent needs with comprehensive, free civil legal services, financial empowerment, impact litigation, policy advocacy, and community partnerships. We aim to disrupt systemic racism by serving clients, whose legal and financial crises are often rooted in racial inequality.

The Shelter and Economic Stability Project at NYLAG provides free legal services and advocacy to low-income people in and trying to access public shelter in New York City, and those having trouble accessing or maintaining Public Assistance and SNAP (food stamp) benefits. We work to ensure that every New Yorker has a safe place to sleep by offering legal advice and representation throughout each step of the shelter application process, assist and advocate for clients who are already in shelter as they navigate the transfer process, and seek adequate facility conditions and resources for their needs. We also represent clients at Administrative Fair Hearings, conduct advocacy with the Department of Social

Services (“DSS”), Benefits Access Centers and SNAP centers, and bring impact litigation to ensure that our clients are obtaining and maintaining an adequate level of shelter and benefits.

All of my clients interact with the Department of Social Services regularly and routinely engage in eligibility and recertification processes for public benefits and access to homeless shelter. Based on my experiences working with them, I appreciate the opportunity to offer the following comments.

I. Int 0139-2026

Int 0139-2026, requiring confirmation notices after the DSS eligibility benefits interview, would provide greater transparency and clarity to clients in the midst of benefits applications (including emergency assistance and applications needed to apply for other rental assistance programs). Far too often, NYLAG clients report waiting hours on the phone for an interview; sometimes only to learn that the interview had already occurred, and sometimes having to repeat the interview because it did not register in the system. A system that automatically generates these confirmations will aid in Fair Hearing advocacy as well, to the extent that it creates explicit documentary evidence of the public benefits eligibility interviews.

Moreover, standardized confirmation notices would help reduce administrative errors, missed deadlines, and unnecessary denials and closures. By ensuring that applicants receive clear, timely, and comprehensive documentation of their interviews, the City can help prevent lapses in SNAP and cash assistance and reduce the burden on both clients and Agency staff, who must otherwise spend time resolving disputes or completing additional interviews. This bill promotes accountability, reinforces due process protections, and supports more efficient and client-centered benefits administration.

II. Int 0232-2026

NYLAG strongly supports all of the changes that Int 0232-2026 would make to the eligibility process for family shelter that would make it easier to traverse. In New York City, the application process for family shelter is extremely onerous. Department of Homeless Services (“DHS”) policy requires that, in order to prove eligibility for family shelter, families must provide a “complete, accurate and verifiable housing history” in the form of documentary evidence or third-party witness collateral contact, including for periods of street homelessness, for the two years leading up to the application (notably, families without children only have to provide one year). If the household does not have such documentary evidence, or if the third-party witness collateral contacts provided do not answer the phone within 10 days, then the family is found ineligible for shelter for “not cooperating.” This happens even when the family has otherwise cooperated fully with the process and has done everything in their power to connect DHS with documentary evidence and third-party witness collateral contacts. And most applications for family shelter are found ineligible. In August of 2025, 12% of families with children who were found eligible for shelter had previously submitted 4 or more applications. And in that same month, only 37% of applications for family shelter were deemed eligible.

Once the family is found “ineligible,” they must reapply for shelter. DHS policy dictates that after a family has been deemed ineligible one time, if they receive the notice of ineligibility in time, they may stay at their placement and reapply over the phone. But after the second finding of ineligibility, the family must start the application process over from the beginning. This means a household is forced to pack up their belongings, leave their shelter placement, and return to the DHS intake site to reapply. Applicant families must miss work while reapplying and may have to keep their children home from daycare and school for fear of not being done with the reapplication quickly enough to pick them up on time. After reapplying,

the families may be sent to new temporary shelter placements, making it almost impossible for them to plan commutes to work, school, and daycare. Reapplying for shelter entails restarting the process from the beginning by having the family return to the intake site and spend another 10-20 hours completing a new application for shelter, typically identical to the prior application, submitting many of the same documents again, and then waiting on-site for a new temporary shelter placement. This happens frequently to NYLAG clients, and, for some families, this occurs every 15 days for months before DHS can verify their housing history. Critically, such families are ineligible for programs that would assist them in transitioning to permanent housing, including access to rental subsidies like CityFHEPS. Without this assistance, families are unlikely to ever gain the means to obtain stable housing. Instead, they continue being reliant on DHS shelters, reapplying repeatedly as their children are moved from placement to placement.

Int 0232-2026 is an important step in the right direction. Reducing required housing history from two years to one year for families with children would significantly decrease the documentation burden homeless families have. Requiring DHS staff to upload all documents relevant to an applicant's housing history to a digital case record would remove the burden of families having to repeatedly resubmit the same documents over and over again. Communicating with applicants about any missing documents through electronic methods will keep applicants in the loop and allow them to proactively address application deficiencies prior to a finding of ineligibility. Giving families with children at least thirty days in temporary shelter pending a determination of their eligibility will increase stability for homeless families and allow applicants more time to track down the documentation necessary. Finally, an informational pamphlet listing examples of documents that could demonstrate proof of housing

history will aid families in obtaining the correct documentation. NYLAG supports all of these measures.

However, in our opinion, families should not have to prove housing history in order to be eligible because families who desperately need shelter are often turning to the shelter system as their last and only option. In fact, single adults do not have to go through the same onerous eligibility determinations to prove that they are actually homeless; families should not either. If there must be eligibility investigations, DHS should perform them in a different way by assisting the applicant in obtaining necessary documentation and allowing attestation as proof of homelessness to be enough. If these occurred, the process would be much more efficient, and it would allow eligible homeless families to obtain shelter and stability more expeditiously. And of course, all reapplications for family shelter should be permitted to be submitted over the phone (as was the case during Covid) so that the family could remain stably placed.

A family experiencing homelessness who is found ineligible for shelter will continue being homeless. A family found eligible for DHS shelter, on the other hand, is then connected to the shelter's housing assistance resources and becomes eligible for rental subsidies such as CityFHEPS, which then actually propels that family out of shelter and into stable housing.

III. T2026-1352 and T2026-1353

NYLAG also supports T2026-1352, which mandates coordination between hospitals and DHS to provide information and outreach services to people experiencing street homelessness when they are being discharged from the hospital during extreme weather events. This bill is complemented by T2026-1353, which mandates that DHS make best efforts to provide people experiencing homelessness with cold weather gear during extreme cold events and cooling gear

during extreme heat events. Both of these policies take a harm reduction approach toward those sleeping outside, rather than a punitive one. Moreover, they provide people with the kind of help they actually want. Many of NYLAG's clients say they would be more likely to engage with outreach workers if the workers were able to provide them with gear to stay warm in the cold months, cool in the hot months, as well as snacks and hot drinks. This plan should be extended to all DHS and contracted outreach partners.

IV.T2026-0008

T2026-0008 is an excellent first step to examine the efficacy of outreach services and to help outreach workers engage with clients. Our clients are often very wary of interacting with outreach workers, in part because every time they meet a new worker they have to start over and share their life story again. If outreach workers could quickly access a client's file, they would have information about what a client needs and have a foundation for building a relationship.

We are also very supportive of increased oversight of outreach efforts as the majority of our clients report having no interest in interacting with outreach. Monitoring these efforts will likely provide important information about how to improve them and make outreach more appealing to people experiencing street homelessness.

We thank the Committee on General Welfare for the work you have done to facilitate services for vulnerable New Yorkers, and for taking this opportunity to continue to improve the conditions for our clients. We hope we can continue to be a resource for you going forward.

Respectfully submitted,

New York Legal Assistance Group

