



Testimony of
Coalition for the Homeless
and
The Legal Aid Society
on
Intros. 92, 108, 124, 132, 190, 229, 276, 421, 431, 513, and 522

before the
New York City Council Committee on General Welfare

Jacquelyn Simone
Policy Director
Coalition for the Homeless

Robert Desir
Staff Attorney
The Legal Aid Society

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The Coalition for the Homeless and The Legal Aid Society welcome this opportunity to testify before the New York City Council's Committee on General Welfare regarding these important pieces of legislation.

Intro. 92: Creation of an advisory board for accessibility at shelters

We support Intro. 92, which would create an advisory board for accessibility at shelters. For too long, homeless New Yorkers with disabilities have encountered a lack of accessibility when they seek services in the Department of Homeless Services (DHS) shelter system. In November 2019, DHS estimated that 77 percent of adult families (families without minor children), 68 percent of single adults, and 53 percent of families with children sleeping in shelters had at least one disability.¹

The advisory board would complement the work being done as part of the settlement in the landmark disability rights lawsuit *Butler v. City of New York*. In May 2015, The Legal Aid Society sued the City of New York and DHS on behalf of two clients who were attempting to enter an adult family shelter but were unable to do so because DHS did not accommodate their respective disabilities. In August 2016, Legal Aid amended the complaint to include five additional named plaintiffs as well as the Coalition for the Homeless and Center for Independence of the Disabled New York (CIDNY) as institutional plaintiffs. The case was also converted to a class action on behalf of all disabled New Yorkers who were residing in or had attempted to enter shelters. After extensive settlement negotiations and a fairness hearing, the stipulation of settlement was signed and became effective on December 7, 2017, and remains under the Court's jurisdiction today. The *Butler* settlement mandates the City to retrofit existing facilities and ensure that new shelters and services accommodate the access needs of homeless New Yorkers with disabilities. The *Butler* settlement was designed to accommodate the various stages of a complex, large-scale, systemic overhaul of New York City's shelter system.

As the City endeavors to make the shelter system more accessible for people with disabilities under the *Butler* settlement, an accessibility advisory board could identify and propose additional reforms. We are pleased that the legislation requires that at least two members of the board have lived experience of disability and homelessness, and we urge the Council to increase the number of such members represented on the board. We strongly encourage the full spectrum of disability experiences to be considered in the creation of this advisory board, to ensure broad inclusion and representation of accessibility needs as they are lived by this population. The Council should also ensure that the recommendations of the advisory board are given thoughtful consideration, and that there is accountability regarding whether their suggested reforms are implemented.

Intro. 108: Creating an annual report on the performance of DHS providers

While we appreciate the need for greater transparency with respect to efforts to address homelessness, the Council must consider that different shelters serve distinct populations with varying needs, and therefore the annual report required pursuant to this legislation may not accurately reflect the performance of providers. For example, a higher per-diem rate may well be justified if a provider is offering more robust services and better-quality food for its residents. Safe Havens, drop-in centers, and stabilization bed facilities (the latter of which are not mentioned in the legislation) are designed to serve unsheltered people, so staff may need more

¹ <https://www.coalitionforthehomeless.org/state-of-the-homeless-2022/>

time to help residents gather documents and apply for housing than would be needed to help residents of other shelters. The City must have adequate oversight and guarantee that all homeless New Yorkers have appropriate, high-quality shelter placements with enough properly trained staff to help them move into decent and desirable permanent housing as quickly as possible. However, the metrics listed in this legislation do not fully capture the nuances and complexity of the shelter system and the challenges that people face in seeking permanent housing, and may in fact create perverse incentives for providers to chase metrics in a way that could be detrimental to the proper provision of shelter, services, and housing to homeless New Yorkers.

Intro. 124: Housing specialists within HRA and DHS

We support Intro. 124, which would ensure that people sleeping in shelters operating under DHS and the Human Resources Administration (HRA) have access to housing specialists. Well-trained housing specialists with manageable caseloads are a critical resource in helping people move from shelters into permanent housing. We often hear from shelter residents who have never been connected to a housing specialist, or who find that their housing specialists are generally unavailable because they are tasked with unreasonably large caseloads. The impact this has on residents' ability to transition out of shelters into homes of their own cannot be underestimated. However, in order to help people move into permanent housing more quickly, the City must also equip these staff with a range of housing options to offer to shelter residents. Even the best-trained housing specialists are hampered by time-consuming bureaucratic delays and a severe lack of housing affordable to New Yorkers with the lowest incomes. In order to reduce homelessness, the City must eliminate administrative hurdles, robustly enforce source of income discrimination protections and other fair housing laws, and commit to building at least 6,000 apartments per year for homeless households and 6,000 apartments per year for extremely low-income households.² Guaranteeing an adequate number of housing specialists at every shelter is an important first step, but this bill alone will not reduce homelessness unless it is also paired with simultaneous investments in permanent affordable housing for those most in need.

Intro. 132: Requiring the establishment of intake centers for families with children; and Intro. 513: Requiring DHS to report on the feasibility of partnering with community-based nonprofit organizations to accept and process applications for shelter intake from families with children

The process of entering shelters is notoriously burdensome and stressful for homeless families. Currently, families with minor children must apply for shelter at a single citywide office, the PATH intake center in the Bronx, which can entail a long journey for people who are displaced from one of the other four boroughs. Establishing intake centers in the other boroughs, as **Intro. 132** proposes, would likely reduce this burden for many families seeking shelter. The recent increase in shelter applications from families with children has strained the PATH intake center, and DHS forced several families to sleep in the intake center in July in violation of the law.³ Opening new intake centers may alleviate some of the pressure at PATH and ensure that families can complete the intake process more quickly, rather than waiting in hours-long lines. In addition to being in close proximity to public transportation, as the legislation requires, these facilities

² https://www.coalitionforthehomeless.org/wp-content/uploads/2022/05/Housing-Affordability-Brief_June-2022.pdf

³ https://www.coalitionforthehomeless.org/wp-content/uploads/2022/08/CFTH_LAS_Testimony_PATH_oversight-8-9-22-1.pdf

must be accessible to people with disabilities. Families should be able to access whichever intake center they prefer, and must never be turned away and sent to a center in a different borough. DHS must also ensure there is coordination and communication across the various intake centers in case someone seeks assistance at multiple locations. The City should also explore increasing intake options for other shelter populations, including single men, single women, and adult families without minor children.

Similarly, **Intro. 513** would require DHS to report on the feasibility of partnering with community-based nonprofit organizations to accept and process applications for shelter by families with children. While this legislation is intended to make the shelter intake process more accessible, and could address some of the language access and cultural competency problems that plague the current process, we have questions about whether such decentralized intake could efficiently connect families to shelter placements and ensure that they have consistent experiences, regardless of which provider processes their applications.

Notably, the problems with shelter intake go beyond the physical location of the PATH intake center and the entities processing applications. The eligibility determination process requires homeless families with children to provide documentation of every place they have stayed in the past two years. This is particularly challenging for families who were doubled-up or unsheltered for some period after losing their homes, and in fact, the vast majority of families are rejected for bureaucratic reasons related to a lack of required documentation that is simply unavailable or impossible for them to obtain. City workers then investigate the prior addresses to assess whether the family could return to one of the past residences. Homeless families are frequently denied shelter when City intake workers incorrectly determine that the family has other options, or fail to accept that a previous host (the “primary tenant”) refuses to permit the return of a homeless family. Although the City does provide families with “conditional” shelter placements during the eligibility process, repeated ineligibility determinations exacerbate stress and instability for homeless families encountering these obstacles, and the time spent in conditional shelter placements is not credited toward housing subsidy eligibility requirements. In July 2022, less than a fifth of families with children who applied at PATH were found eligible for shelter, and 16 families with children had to submit six or more applications before ultimately being found eligible. For adult families, these statistics are even more troubling: Only 10 percent of adult families were found eligible for shelter in July 2022, and more than a quarter of eligible adult families had to submit six or more shelter applications.

These two bills could help homeless families, depending on how they are implemented, but they do not address the underlying problems with the onerous family shelter eligibility process. In addition to adding shelter intake centers for families in different boroughs and considering nonprofit intake partners, we encourage the City and State to address the many bureaucratic barriers that families face when they attempt to enter shelters, and to ensure that reforms are made that make it easier for both families with children and adult families to obtain prompt and proper shelter placements.

Intro. 190: Creation and distribution of a homeless bill of rights

We support the goal of Intro. 190 to create a homeless bill of rights, which would help homeless New Yorkers assert their rights and access resources. The Coalition and Legal Aid seek to

inform people of their rights by creating information sheets, doing outreach at shelters, and advocating on behalf of individuals who seek our assistance. We often meet people who are not aware of certain rights they have as homeless New Yorkers, such as the right to vote despite their housing status. While people do receive basic information on some rights when they enter shelters, they do not receive a comprehensive list of rights and resources. The strength of any bill of rights document, however, depends on the specific content and the responsible agency's commitment to recognizing and enforcing said rights. Accordingly, we look forward to providing feedback on any drafts of the homeless bill of rights should this legislation be enacted.

The Council must also account for different populations and shelter types across the system, which may impact the content of the bill of rights. For example, one of the rights listed in the legislation is the right to "Be placed in a room with a person who identifies as the same gender." This is not relevant to families with children or adult families, which have their own units rather than roommates. This wording is also problematic for single adults in congregate shelters, however, as it could create issues for homeless people who are transgender, gender non-conforming, or non-binary (TGNCNB). Homeless New Yorkers who are TGNCNB have access to whichever single adult shelter system they deem safest for them, which might mean that the other residents of their shelter do not have the same gender identity as they do. The wording of this legislation, therefore, could unintentionally subject TGNCNB homeless people to further discrimination and ostracization in an already-intimidating adult shelter system that is predominantly divided into shelters for single adult men and shelters for single adult women. Other categories enumerated in the bill of rights, such as "housing and financial assistance," will need further elaboration to ensure that homeless shelter residents understand which services they are entitled to and how to access them. We look forward to working with the Council on creating a strong, clear bill of rights that can empower homeless New Yorkers.

Intro. 229: Monthly rental assistance payments for households with rental assistance vouchers

We support the underlying goal of Intro. 229 to give tenants flexibility to rent apartments at the full payment standard (108 percent of HUD's Fair Market Rent), which is the level required by Local Law 71 and intended by the City Council. However, since the bill's introduction, HRA has expressed willingness to adopt HUD's policy of giving tenants the benefit of the utility allowance by reducing the tenant's rent share. Such a change is in harmony with the Council's intent to structure City subsidies in parallel with Section 8. Under HUD's procedures, tenants who rent apartments at less than the full "payment standard" pay less than 30 percent of their incomes as rent to their landlords, and can use the resulting savings to pay their utility bills. Such a policy would benefit thousands of recipients of City rent subsidies, who currently must pay utilities on top of paying 30 percent of their incomes to their landlords. Given the tightness of the city's rental market, however, recipients of HRA subsidies should have the same option as Section 8 voucher holders to rent apartments at the full payment standard, even if that means forgoing the utility credit.

We suggest that the Council amend Intro. 229 to require HRA to reduce tenant rent shares to reflect the cost of utilities as is done in the Section 8 program, while preserving tenants' flexibility to rent apartments at the statutory maximum. We also urge the Council to make funds available for HRA to upgrade its computer system to handle the above policy changes.

Additional Barriers to Accessing CityFHEPS

As explained above, we support Intro. 229 as its passage will increase access to CityFHEPS. However, reforming the utility allowance requirement is only one of the many attainable changes the CityFHEPS program needs to meaningfully further its goals of facilitating access to safe, decent, affordable housing while reducing the shelter population and the high attendant costs of homelessness. Below we outline other aspects of the program that merit change/reform:

- 1) **Rent Reasonableness.** As with the utility allowance rule, the rent reasonableness rule prevents CityFHEPS voucher holders from accessing apartments that meet the established payment standard, and its implementation creates uncertainty even when a tenant has found a potential home. Shelter residents seeking apartments can never know in advance whether a unit they have found will be considered “reasonable,” even if the rent is at or below the payment standard. These New Yorkers undergo the arduous rental application process and then wait weeks or months only to learn that the rent was rejected as not reasonable, and they have to restart their search. Further, tenants in eviction cases who hope to use CityFHEPS to retain their current apartments cannot know in advance what rent amount they can agree to when executing Housing Court settlement agreements. The City Council should eliminate the rent reasonableness requirement to ensure tenants are not unfairly prevented from renting apartments at or below the full payment standard.
- 2) **Immigration Status.** The City of New York can and should extend CityFHEPS eligibility to all non-U.S. citizen New Yorkers, including those without immigration status, despite federal laws that purport to limit eligibility to certain categories of so-called “qualified aliens.” Such laws have been found unconstitutional or unenforceable. Further, they do not preempt the City or State of New York from extending a benefit, such as CityFHEPS, to any non-U.S. citizen New Yorker.
- 3) **Source of Income Discrimination.** Despite ambitious private enforcement actions and prohibitions in the City and State human rights laws, source of income discrimination – landlords’ refusal to rent to voucher holders – remains rampant.⁴ The source of income discrimination units at the New York City Commission on Human Rights (NYCCHR) and DSS have lost numerous staff members and are unable to keep up with the pace of landlord discrimination.⁵ Homeless New Yorkers continue to face repeated rejections over many months because of their vouchers, or never receive responses from the landlords they have contacted. The Fiscal Year 2023 budget includes funding for the

⁴ Matthew Haag, “‘She Wants Well-Qualified People’: 88 Landlords Accused of Housing Bias,” *The New York Times*, March 15, 2021, <https://www.nytimes.com/2021/03/15/nyregion/real-estate-lawsuit-section-8-discrimination.html>.; Mihir Zaveri, “Discrimination Weakens Tool for Reducing N.Y. Homelessness, Lawsuit Says,” *The New York Times*, May 25, 2022, <https://www.nytimes.com/2022/05/25/nyregion/ny-vouchers-homeless-discrimination.html>.

⁵ David Brand, “NYC Was Set to Crack Down on Voucher Discrimination, But its Enforcement Teams Keep Shrinking,” *City Limits*, March 18, 2022, <https://citylimits.org/2022/03/18/nyc-was-set-to-crack-down-on-voucher-discrimination-but-its-enforcement-teams-keep-shrinking/>.

source of income unit,⁶ and the Mayor’s housing plan declares that the City “will launch a coordinated enforcement and outreach effort to root out and combat source-of-income discrimination.”⁷ However, it is unclear how this will take form. It is apparent, however, that indistinct proclamations are not enough to stem the tide as rents soar and competition for apartments grows. This dire problem requires dedicated staff and agency prioritization. The NYCCHR source of income discrimination unit should be fully funded to ensure that voucher holders facing discrimination are able to obtain quick interventions from the NYCCHR that will allow them to secure apartments.

- 4) **Unacceptable Delays in CityFHEPS Move-Ins.** Delays in CityFHEPS are unfortunately commonplace and well-documented.⁸ Even after a landlord agrees to rent an apartment, New Yorkers regularly wait for up to six months in shelters while the City approves their applications. Voucher holders must navigate a byzantine lease-up process where the smallest error – a misspelled address or an unusual broker’s license – causes weeks of delays, which have profound negative consequences.⁹ Voucher holders continue to endure months of homelessness, and they cannot pursue other housing opportunities while the issues are resolved. Meanwhile, the collateral effects of joblessness, mental health challenges, familial instability, and poor living conditions compound. Landlords sometimes become so frustrated that they disengage, leaving prospective tenants without options.

Unless significant changes are adopted, CityFHEPS will not serve its purpose of allowing families and individuals to escape the shelter system and live in homes with dignity. The following changes will significantly reduce CityFHEPS delays. The City should ensure that DSS:

- **Streamlines its review process.** This may include:
 - Requiring DSS reviewers to review an entire package for mistakes before sending it back to the shelter provider for corrections;
 - Making it easy for shelter providers to communicate by telephone and email with DSS reviewers in order to discuss resolving issues with a package;
 - Reducing the number of rounds of review for each package so that DSS must only review a package once;
 - Reducing the amount of paperwork required;

⁶ Jeanmarie Evely and David Brand, “Here’s How NYC’S \$101 Billion Budget Addresses Homelessness,” *City Limits*, June 14, 2022, <https://citylimits.org/2022/06/14/heres-how-nycs-101-billion-budget-addresses-homelessness/>.

⁷ <https://www1.nyc.gov/assets/home/downloads/pdf/office-of-the-mayor/2022/Housing-Blueprint.pdf>

⁸ David Brand, “Administrative Obstacles Jam Up Moving Process for NYC Shelter Residents,” *City Limits*, Jan. 31, 2022, <https://citylimits.org/2022/01/31/administrative-obstacles-jam-up-moving-process-for-nyc-shelter-residents/>; Chau Lam, “Spelling mistakes and clerical errors could keep many stranded in shelters under city housing program,” *Gothamist*, Feb. 18, 2022, <https://gothamist.com/news/spelling-mistakes-and-clerical-errors-could-keep-many-stranded-shelters-under-city-housing-program>.

⁹ Instead of fixing errors, the City frequently rejects applications, whereupon it then takes weeks for overworked shelter staff to revise them. If there are additional errors that the City did not identify upon first review, an application goes back to the shelter provider again. If a resident is transferred to a different shelter, the process typically begins all over again. In practice, residents and landlords often must agree on new lease dates every month as move-ins are delayed repeatedly.

- o Correcting and approving packages with minor clerical errors, like an address that says “street” instead of “place”; and
 - o Providing automatic email notifications with package updates.
- **Sets clear benchmarks for approving CityFHEPS packages.** DSS should set clear goals for move-out times for each application and ensure that it meets those goals in facilitating moves.
- **Re-trains shelter staff.** DSS should track how long the contracted shelter providers take to facilitate move-outs. Shelter providers that are the source of repeated delays must be intensively retrained.
- **Phases out contracts with shelter providers who are unable to meet move-out goals.** Frequently, delays in lease-up are due to shelter providers failing to facilitate move-outs. DHS should not agree to extend contracts with shelter providers who fail to efficiently move clients out of shelters.
- **Approves apartments that pass inspections.** If an apartment passes a CityFHEPS inspection, the tenant should presumptively be permitted to move in, regardless of whether DHS has approved all the paperwork. Unless an apartment has not passed an inspection, within 45 or 60 days a tenant’s package should be automatically approved and HRA should prepare payment to the landlord.

These changes, in addition to the passage of Intro. 229, would strengthen the CityFHEPS program and help more New Yorkers move out of shelters.

Intro. 276: De-escalation and trauma-informed training for DHS employees; and Intro. 431: Requiring DHS to provide customer service training

The Coalition and Legal Aid support training aimed at improving interactions between clients and agency and contractor staff, such as improving professionalism, cultural sensitivity, and the capacity to de-escalate conflict using trauma-informed care. Homeless New Yorkers often describe the day they first entered a shelter as being one of the worst days of their lives. Many of them are dealing with traumatic personal, economic, and/or systemic issues that have left them with nowhere to turn but a shelter – a place where they hope to find help. However, we regularly hear that interactions with staff in these facilities can exacerbate rather than ameliorate this trauma. The Coalition and Legal Aid support the goals of **Intro. 276** and **Intro. 431** because it is imperative that New Yorkers in crisis are served with compassionate, culturally competent, and welcoming staff the moment they enter a shelter. In the absence of sufficient high-quality training, negative interactions with staff can deter individuals and families from seeking shelter and services or cause them to leave the shelter system altogether. We respectfully suggest that the Council consider the following amendments to these bills:

- Require training to be done by social services professionals, with an emphasis on trauma-informed care and de-escalation techniques;
- Require training to include basic information about mental illnesses and addictions, including symptoms and appropriate responses to psychiatric distress and overdose, as well as other disabilities, including how to locate communication assistance for those who require it;
- Require training to include the broadest possible spectrum of cultural competency topics to ensure the diversity of all New Yorkers will be met with compassion and acceptance;

- Ensure contracted providers do not face an unfunded mandate to provide high-quality training without financial assistance;
- Require the training documents to be published annually, along with data regarding the number of staff trained; and
- Solicit advice from people with lived experience, shelter providers, and advocates about training topics and collect their feedback to ensure the success of such trainings.

Intro. 421: Requiring DHS to report on families with children in shelter

We support efforts to increase transparency regarding the homelessness crisis, as Intro. 421 aims to do. Some of the metrics enumerated in this legislation, such as the average length of stay in shelters and the number of applications families must submit before being found eligible for shelter, are already contained in other monthly reports published by DHS. Other metrics, such as shelter proximity to services, schools, and jobs, would help clarify how well the shelter system is accommodating families’ needs for geographically appropriate placements. The educational metrics would improve accountability regarding whether homeless students are missing school and falling behind due to issues with shelter eligibility and the placement process. Likewise, the reporting on child care and pre-kindergarten enrollment can illustrate service gaps. Reporting on exits to permanent housing can also identify whether families in different types of shelters are receiving equitable access to housing resources. Taken together, the various data points required in these reports would strengthen transparency and allow better targeting of services and supports for homeless families with children.

Intro. 522: Requiring mental health professionals in families with children shelters

While we support the goal of expanding access to mental health care for homeless New Yorkers, we have some concerns about the scope of Intro. 522 as well as some technical considerations. The pandemic has exacerbated mental health challenges for many people, including members of homeless families with children. Mental illness can be a contributing factor to someone’s homelessness, and the instability and trauma of homelessness can also worsen mental illnesses. However, we have seen a higher need for mental health services among other shelter populations – specifically single adults and adult families. Data reported by DHS show the high prevalence of mental health conditions among single adults and adult families, and the vast majority of shelters serving these populations do not offer on-site mental health services.¹⁰ The legislation’s exclusive focus on shelters serving families with children does not seem to be aligned with the greatest needs.

There are also several technical issues with the legislation as currently drafted. The bill’s requirement is not consonant with the regulations of the New York State Office of Temporary and Disability Assistance, which may preempt this mandate. We are also concerned about whether all shelters have the appropriate certification to hire the professionals listed in the legislation. The legislation considers “mental health professionals” to include a licensed clinical social worker, a psychiatric nurse practitioner, a psychiatrist, or a psychologist. However, an employer is not generally authorized to employ many of these professionals for the purpose of serving clients without also holding a license of some type that establishes the statutory authority for that employment relationship. Unless the employer obtains such license, they would have to

¹⁰ <https://www1.nyc.gov/assets/dhs/downloads/pdf/Local-Law-115-of-2017-Report-CY2020.pdf>

engage the services of a private practice or practitioner. We therefore recommend that the legislation specify that contracting with private practices or individual practitioners is one means of fulfilling this requirement for those providers lacking statutory authority to directly employ mental health professionals, rather than merely stating that mental health services shall be available.

With hundreds of shelters serving families with children, and more facilities opening regularly in light of the increasing number of families seeking shelter, it is unclear whether shelter operators will be able to find enough private practitioners to meet the requirements of this legislation. The challenge of finding a sufficient number of practitioners is further complicated by the fact that the legislation is subject to appropriation, which could lead to funding inconsistencies over time. Even if providers are able to find private practitioners to satisfy the caseload thresholds in the legislation, some licensed professionals may be restricted as to the settings in which their services may be rendered in the absence of a site-specific license to offer their specific clinical services to the public. The list of services in the legislation also ignores the bright line scope of practice restrictions on which professionals may provide which services, including who is allowed, and not, to perform assessments and make diagnoses. These rules are intended to prevent unauthorized or unlicensed entities from claiming to run a clinic or hospital or from hiring clinical staff without the clinical authority required to supervise them. The legislation, while well-intentioned, must acknowledge these regulations and address the fact that not all shelters are authorized to provide these services.

Additionally, all mental health services must be entirely voluntary and ensure adequate confidentiality protections. The report required by the legislation should account for the fact that some homeless New Yorkers might not need mental health care and others might prefer to access mental health care outside of the shelter system, particularly if they want to maintain continuity of care despite transfers between shelters and eventual moves into permanent housing. Homeless New Yorkers report varying degrees of trust with shelter staff, and they may be hesitant to engage in on-site mental health care due to stigma or fear that the staff might somehow use their engagement in mental health services against them. Increasing access to mental health care is a laudable goal, but the City must not ignore the individual needs and preferences of homeless New Yorkers.

Conclusion

We thank the General Welfare Committee for the opportunity to testify on these bills, and for the Council's dedication to addressing New York City's mass homelessness crisis.

About The Legal Aid Society and Coalition for the Homeless

The Legal Aid Society: The Legal Aid Society (LAS), the nation's oldest and largest not-for-profit legal services organization, is more than a law firm for clients who cannot afford to pay for counsel. It is an indispensable component of the legal, social, and economic fabric of New York City – passionately advocating for low-income individuals and families across a variety of civil, criminal, and juvenile rights matters, while also fighting for legal reform. This dedication to justice for all New Yorkers continues during the COVID-19 pandemic.

The Legal Aid Society has performed this role in City, State, and federal courts since 1876. It does so by capitalizing on the diverse expertise, experience, and capabilities of more than 2,000 attorneys, social workers, paralegals, and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in 26 locations in New York City, LAS provides comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel.

LAS's legal program operates three major practices — Civil, Criminal, and Juvenile Rights — and receives volunteer help from law firms, corporate law departments and expert consultants that is coordinated by LAS's Pro Bono program. With its annual caseload of more than 300,000 legal matters, The Legal Aid Society takes on more cases for more clients than any other legal services organization in the United States. And it brings a depth and breadth of perspective that is unmatched in the legal profession.

The Legal Aid Society's unique value is an ability to go beyond any one case to create more equitable outcomes for individuals and broader, more powerful systemic change for society as a whole. In addition to the annual caseload of 300,000 individual cases and legal matters, LAS's law reform representation for clients benefits more than 1.7 million low-income families and individuals in New York City and the landmark rulings in many of these cases have a State-wide and national impact.

The Legal Aid Society is uniquely positioned to speak on issues of law and policy as they relate to homeless New Yorkers. The Legal Aid Society is counsel to the Coalition for the Homeless and for homeless women and men in the *Callahan* and *Eldredge* cases. The Legal Aid Society is also counsel in the *McCain/Boston* litigation in which a final judgment requires the provision of lawful shelter to homeless families. LAS, in collaboration with Patterson Belknap Webb & Tyler, LLC, filed *C.W. v. City of New York*, a federal class action lawsuit on behalf of runaway and homeless youth in New York City. Legal Aid, along with institutional plaintiffs Coalition for the Homeless and Center for Independence of the Disabled-NY (CIDNY), settled *Butler v. City of New York* on behalf of all disabled New Yorkers experiencing homelessness. Also, during the pandemic, The Legal Aid Society along with Coalition for the Homeless continued to support homeless New Yorkers through litigation, including *E.G. v. City of New York*, Federal class action litigation initiated to ensure WiFi access for students in DHS and HRA shelters, as well as *Fisher v. City of New York*, a lawsuit filed in New York State Supreme Court to ensure homeless single adults gain access to private hotel rooms instead of congregate shelters during the pandemic.

Coalition for the Homeless: Coalition for the Homeless, founded in 1981, is a not-for-profit advocacy and direct services organization that assists more than 3,500 homeless and at-risk New Yorkers each day. The Coalition advocates for proven, cost-effective solutions to address the crisis of modern homelessness, which is now in its fifth decade. The Coalition also protects the rights of homeless people through litigation involving the right to emergency shelter, the right to vote, the right to reasonable accommodations for those with disabilities, and life-saving housing and services for homeless people living with mental illnesses and HIV/AIDS.

The Coalition operates 11 direct-services programs that offer vital services to homeless, at-risk, and low-income New Yorkers. These programs also demonstrate effective, long-term, scalable solutions and include: Permanent housing for formerly homeless families and individuals living with HIV/AIDS; job-training for homeless and low-income women; and permanent housing for formerly homeless families and individuals. Our summer sleep-away camp and after-school program help hundreds of homeless children each year. The Coalition's mobile soup kitchen, which usually distributes 800 to 1,000 nutritious hot meals each night to homeless and hungry New Yorkers on the streets of Manhattan and the Bronx, had to increase our meal production and distribution by as much as 40 percent and has distributed PPE and emergency supplies during the COVID-19 pandemic. Finally, our Crisis Services Department assists more than 1,000 homeless and at-risk households each month with eviction prevention, individual advocacy, referrals for shelter and emergency food programs, and assistance with public benefits as well as basic necessities such as diapers, formula, work uniforms, and money for medications and groceries. In response to the pandemic, we are operating a special Crisis Hotline (1-888-358-2384) for homeless individuals who need immediate help finding shelter or meeting other critical needs.

The Coalition was founded in concert with landmark right-to-shelter litigation filed on behalf of homeless men and women (*Callahan v. Carey* and *Eldredge v. Koch*) and remains a plaintiff in these now consolidated cases. In 1981, the City and State entered into a consent decree in *Callahan* through which they agreed: "The City defendants shall provide shelter and board to each homeless man who applies for it provided that (a) the man meets the need standard to qualify for the home relief program established in New York State; or (b) the man by reason of physical, mental or social dysfunction is in need of temporary shelter." The *Eldredge* case extended this legal requirement to homeless single women. The *Callahan* consent decree and the *Eldredge* case also guarantee basic standards for shelters for homeless men and women. Pursuant to the decree, the Coalition serves as court-appointed monitor of municipal shelters for homeless single adults, and the City has also authorized the Coalition to monitor other facilities serving homeless families. In 2017, the Coalition, fellow institutional plaintiff Center for Independence of the Disabled – New York, and homeless New Yorkers with disabilities were represented by The Legal Aid Society and pro-bono counsel White & Case in the settlement of *Butler v. City of New York*, which is designed to ensure that the right to shelter includes accessible accommodations for those with disabilities, consistent with Federal, State, and local laws. During the pandemic, the Coalition has worked with The Legal Aid Society to support homeless New Yorkers, including through the *E.G. v. City of New York* Federal class action litigation initiated to ensure WiFi access for students in DHS and HRA shelters, as well as *Fisher v. City of New York*, a lawsuit filed in New York State Supreme Court to ensure homeless single adults gain access to private hotel rooms instead of congregate shelters during the pandemic.