Testimony of Coalition for the Homeless and The Legal Aid Society

on

How the City of New York Reports Data About Homelessness and Rental Assistance Programs, and the City's Evaluation Study of the Homebase Program

Presented before

The New York City Council, Committee on General Welfare

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Coalition for the Homeless and the Legal Aid Society welcome this opportunity to testify before the New York City Council in support of legislation that would require the City of New York to report full and accurate data about homelessness and rental assistance programs, and to offer our views of the City's controversial and misguided evaluation study of the Homebase program.

About the Coalition and the Legal Aid Society

<u>Coalition for the Homeless</u>: Coalition for the Homeless, founded in 1981, is a not-for-profit advocacy and direct services organization that assists more than 3,000 homeless New Yorkers each day. The Coalition advocates for proven, cost-effective solutions to the crisis of modern homelessness, which now continues past its third decade. The Coalition also struggles to protect the rights of homeless people through litigation around the right to emergency shelter, the right to vote, and appropriate housing and services for homeless people living with mental illness and HIV/AIDS.

The Coalition operates twelve direct-services programs that both offer vital services to homeless, at-risk, and low-income New Yorkers, and demonstrate effective, long-term solutions. These programs include supportive housing for families and individuals living with AIDS, a job-training program for homeless and formerly-homeless women, a Rental Assistance Program which provides rent subsidies and support services to help working homeless individuals rent private-market apartments, and apartment buildings in Manhattan which provide 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 distributes more than 900 nutritious meals to street homeless and hungry New Yorkers each night. Finally, our Crisis Intervention Department assists more than 1,000 homeless and at-risk households each month with eviction prevention assistance, client advocacy, referrals for shelter and emergency food programs, and assistance with public benefits.

The Coalition also represents homeless men and women as plaintiffs in <u>Callahan v. Carey</u> and <u>Eldredge v. Koch</u>. In 1981 the City and State entered into a consent decree in <u>Callahan</u> in which it was agreed that, "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 to physical, mental or social dysfunction is in need of temporary shelter." The <u>Callahan</u> consent decree and <u>Eldredge</u> case also guarantee basic standards for shelters for homeless men and women. Pursuant to the decree, the Coalition serves as courtappointed monitor of municipal shelters for homeless adults.

<u>The Legal Aid Society</u>: The Legal Aid Society, 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.

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 850 of the brightest legal minds. These 850 Legal Aid Society lawyers work with 600 social workers, investigators, paralegals and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in 25 locations in New York City, the Society provides comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel.

The Society'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 the Society'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, the Society's law reform representation for clients benefits some 2 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.

Intro. 395:

Requiring the City of New York to Share Data about the Advantage Program and Other Rent Subsidy Programs

With some changes that we will recommend to the committee, we strongly support Intro. 395, a bill which would require the City to report information and data about the Advantage program and other City-administered rental assistance programs.

Since it was launched three years ago, there has been a lingering and fundamental dispute about the effectiveness of the Advantage program – a program which provides only two years or less of rental assistance and which is the City's primary tool for re-housing homeless New Yorkers. On the one hand, Bloomberg administration officials tout the program as an unqualified success and claim that only a small percentage of Advantage households have returned to the municipal shelter system.

On the other hand, people working on the front lines, shelter providers, eviction prevention service providers, legal services organizations, local elected officials, landlords, and affected families themselves see a dramatically different reality. We all see a program that is, by design, destined to fail vulnerable children and adults by cutting them off of rental assistance when they lack incomes sufficient to afford apartment rents. We see a program under which large numbers of former Advantage recipients have become homeless again, with many of them forced to seek shelter again. And we don't believe that the administration's claims about the success of the program are credible. This is especially true because the administration fails to describe how many Advantage households out of

those not receiving rental assistance of any kind have fallen back into homelessness – because ultimately that is the only way to evaluate the success of a time-limited subsidy like the Advantage program.

In the midst of this three-year-old debate, Bloomberg administration officials have consistently and stubbornly refused to provide basic data and information about the outcomes of the program, data that the administration already has in its possession. In fact, to date, City officials have never publicly revealed the number of Advantage households that have returned to the municipal shelter system – one of several fundamental measures of the success of the program, though not the only one. Indeed, we understand that the Department of Homeless Services has even refused requests for this information from this very City Council committee, which has oversight over the program, as well as from other public officials at the State and local level.

Even though the City is spending millions of dollars on the Advantage program and imposing increasingly more restrictive conditions on recipients, the Department of Homeless Services has released precious little data relating to the stability of families once they leave the Advantage program The attached graph and table – which was compiled from data manually tabulated from printouts provided by DHS pursuant to freedom of information law (FOIL) requests from the Legal Aid Society -- show an alarming increase in re-applications for shelter from families who were previously in Advantage apartments.

The DHS data establishes that from April 2007 (the start of the Advantage program) through September 2010:

- 3,144 re-applications for shelter were filed by families who previously had Advantage apartments.
- 1,401 of those applications resulted in determinations that the family was eligible for shelter.

In addition, the graphed data shows that the number of Advantage families applying for shelter has been increasing sharply since the spring of 2009, as more and more families' Advantage one- or two-year subsidies expire.

This graph illustrates exactly why it is so important for the City Council to require DHS to provide data necessary to evaluate the effectiveness of this taxpayer-funded program. It took Legal Aid staff members four FOIL requests, several follow-up requests, multiple copying fees, and dozens and dozens of hours to manually count, tabulate, and confirm the data contained in the graph. This data relating to whether formerly homeless families can maintain their apartment once they lose their Advantage subsidies should be central to any decisions on how to modify or extend the Advantage programs or explore alternative means of stabilizing homeless families in permanent housing, and yet none of this data was made publicly available at the time that DHS determined last summer to drastically decrease the availability of the Advantage program and the amount of the subsidy.

It is also important to point out that the numbers above undoubtedly include multiple applications filed by the same family, since DHS routinely finds families ineligible for shelter before conceding their eligibility, as this committee knows from testimony presented at a recent oversight hearing. Because of the way that the City produces the FOIL data, it is impossible for us to determine the actual number of families who re-applied and who were found eligible, which is why a reporting bill is critically needed.

Another way to look at the dramatic re-application and eligibility rates of former Advantage families is by compiling the "summary" data that appears at the end of each of the four data sets that DHS produced pursuant to FOIL. According to these summaries (re-printed below), between April 1, 2007 and October 15, 2010, there were

- 2,069 "reapplications" of families with prior Advantage exits, and
- 1,298 "eligible families ".

Since these numbers are lower than the total number of applications and total number of eligible applications listed in each data set, they appear to represent the number of unique (or unduplicated) families who applied and were found eligible in each period. Again, since DHS has not publicly reported these measures in a transparent way, a reporting bill is needed so that the Advantage program may be properly evaluated.

Recently we were also able to obtain a Department of Homeless Services report, never made available to the public, which includes similarly troubling outcomes data (through September 30, 2010) about the Advantage program. The DHS Advantage outcomes report confirms the Legal Aid Society analysis of documents produced pursuant to a FOIL request. This data summarized is in the table presented here.

ADVANTAGE PROGRAM OUTCOMES THROUGH SEPT. 30, 20	110
(Source: DHS report on Advantage program through 9/30/2010)	,10
Advantage families who've applied for shelter	1,613
Advantage families deemed eligible for shelter	1,111
Advantage families not receiving Advantage subsidy	6,271
Advantage families with Section 8 vouchers	1,744
Total Advantage families with no rental assistance (no	
Advantage subsidy or Section 8 voucher)	4,527
Percent of Advantage families with no rental assistance	
who've applied for shelter	35.6%
Percent of Advantage families with no rental assistance	
deemed eligible for shelter	24.5%

All in all, the information obtained from the DHS Advantage outcomes report suggests that at least <u>one of every four Advantage households who are not receiving rental assistance has returned to the shelter system</u>. And at least <u>one of every three such Advantage households has applied for emergency shelter</u>.

Simply put, this is an alarming failure rate for a program that is only three years old and is the centerpiece of the City's approach to rising homelessness.

For this reason among others, we strongly support legislation that will require the City to make public basic data and information about not only the Advantage program, but also other rental assistance programs administered by the City. We believe that, in its current version, Intro. 395 is a major step in that direction. However, we believe the bill can be significantly improved in order to ensure that complete and accurate data is made available to the public, and we will recommend such changes to the committee in a separate communication.

Intro. 444:

Requiring the City of New York to Provide Accurate and Complete Data about the Number of Homeless People Residing in Municipal Shelters

With some changes that we will recommend to the committee, some of which are discussed below, we also strongly support Intro. 444, a bill which would require the City of New York to report accurate and complete data about the number of homeless people residing in municipal shelters – something which the City currently fails to do.

It is vitally important that municipal government agencies report accurate and comprehensive information to New York City residents about major public policy issues like homelessness. The City of New York's agency websites and the City Charter-mandated Mayor's Management Report are two prominent examples of how the City communicates vital information to students, the news media, researchers, and policymakers, as well as to the general public. And the City has an obligation to ensure that this information is accurate, complete, and free of error.

It is therefore troubling that the City has failed to meet this obligation with regards to information about homelessness. Indeed, in recent years the Department of Homeless Services has excluded important data about homelessness in New York City from its website and its publicly-available reports, including the Mayor's Management Report. These incomplete reports create the false impression that the homeless shelter population in New York City is smaller than it actually is.

The following examples illustrate how DHS provides incomplete, misleading data to New York City residents.

1. <u>Inaccurate data reported on the DHS website</u>:

Earlier this autumn the DHS website reported that, on the night of November 1, 2010,

there were 36,217 "total individuals" residing in municipal shelters (see copy of DHS "Daily Report" for that date attached). This figure included 14,540 children and 8,386 single adults.

However, DHS reports obtained by Coalition for the Homeless – reports which are not made available to the general public and which are not posted on DHS's website – report a significantly larger shelter population, illustrated in the table here. (See copies of these DHS reports attached.)

NYC Homelessness Data: Comparison of Incomplete NYC Department of Homeless Services Reports and Actual Homeless Shelter Census Reports				
	DHS "Daily	DHS census		
	Report"	reports		
	11/1/2010	10/31/2010		
Total Homeless Shelter Population	36,217	37,987		
Number of Homeless Families	9,452	9,696		
Number of Homeless Children	14,540	14,982		
Number of Homeless Adults in Families	13,291	13,743		
Number of Homeless Single Adults	8,386	9,262		
	Mayor's	DHS census		
	Management re			
	Report, FY 2010	FY 2010		
FY 2008 Average Daily Census of Single Adults	6,737	6,850		
FY 2009 Average Daily Census of Single Adults	6,526	7,078		
FY 2010 Average Daily Census of Single Adults	7,167	7,901		

For the night of October 31, 2010 – only one night before the DHS website's report – the total shelter population was actually at least 37,987 people. This more comprehensive and accurate figure includes 14,982 children and 9,262 single adults. (Unfortunately a direct comparison between both dates is impossible because DHS does not post a "Daily Report" on its website for every day and does not archive past reports. For instance, as of yesterday, December 8th, DHS's website still had the "Daily Report" for November 26th)

In short, DHS's website inaccurately reports a municipal homeless shelter population that is at least 5 percent smaller than the actual population. That is, DHS fails to report on at least one of every twenty municipal shelter residents in New York City.

Why is the shelter census reported on DHS's website at least 5 percent lower than the

more comprehensive figure included in non-public DHS reports? This is because the DHS website routinely excludes data about more than a dozen municipal homeless shelters and their residents. The excluded shelters include "safe haven" shelters for long-term street homeless individuals; shelters for homeless veterans; and shelters for homeless families administered by the NYC Department of Housing Preservation and Development (HPD). (Note that data about HPD shelters has been included in every homeless family census report issued by the City since the early 1980s.)

On October 31st, for instance, there were 478 homeless people residing in "safe haven" shelters, 373 homeless people in veterans shelters, and 207 homeless families (with 419 children and 418 adults) in HPD shelters. In addition, DHS administers another group of shelters for homeless single adults, called "stabilization beds," whose data has never been publicly reported, meaning that the actual number of homeless people in municipal shelters is even larger than what is discussed here.

Thus, when the general public, news media, and policymakers visit the DHS website they are falsely informed – even on the site's home page – that the municipal homeless shelter population is nearly 2,000 people smaller than it actually is. This is the reason why the New York Times and other news organizations have in recent years reported a smaller homeless shelter population than the true number, thus inadvertently misinforming New Yorkers about the genuine scale of the homeless population in New York City.

2. <u>Inaccurate data in the Mayor's Management Report:</u>

The City Charter-mandated <u>Mayor's Management Report</u> (MMR) also includes incomplete, misleading data about the size of the homeless shelter population.

For example, the MMR for FY 2010 reports that the "average number of single adults in shelter each day" in FY 2008 was 6,737 people and in FY 2009 was 6,526 people, suggesting that the average number of homeless single adults in shelter each night declined by 3.1 percent during that period.

However, like the DHS website, the MMR does not include data for homeless single adults residing in City-administered "safe haven" shelters and veterans shelters. In fact, when data for these shelters is included, the average number of homeless single adults in FY 2008 was 6,850 people and in FY 2009 was 7,078 people. Thus, the average number of homeless single adults residing in shelters actually *increased* by 3.3 percent during that period, not the decrease falsely claimed by the incomplete MMR data.

Similarly, the MMR reports a FY 2010 average shelter census of 7.167 homeless single adults, and thus claims an increase from the previous year of 641 adults, a 10 percent increase. However, DHS census reports that include "safe haven" shelters and veterans shelters show a larger average census of 7,901 adults in FY 2010. And the increase from the previous year was larger – up 823 adults, a 12 percent increase.

The arbitrary exclusion of data about "safe haven" shelters and veterans shelters is particularly troubling because many of those facilities are actually longstanding municipal shelters for adults that have merely been given a different label and, in some instances, a different service model – and are actually included in past MMR data, thus distorting the historical accuracy and comparability of the City's data. In recent years DHS officials have repeatedly spoken to the news media and at City Council hearings about both "safe haven" and veterans shelters, making their exclusion from the MMR even more puzzling. In addition, as noted above DHS administers another group of shelters for homeless single adults, called "stabilization beds," whose data has never been publicly reported, meaning that the actual number of homeless single adults in municipal shelters is even larger than the figure cited above.

3. Additional municipal shelters for homeless New Yorkers:

In addition, the City has never provided complete and accurate reporting about homeless New Yorkers residing in municipal shelters which are not directly administered by the Department of Homeless Services – but which, like the HPD shelters described above, may have homeless people who were referred by DHS. And many of the agencies that administer those shelters fail to provide accurate and complete data about those facilities.

As this committee knows, for various historical and programmatic reasons the City provides shelter and other services to some specific sub-populations of homeless people through agencies other than DHS. These include:

- <u>Shelter for victims of domestic violence</u>, which is administered by the Human Resources Administration;
- Shelter (including emergency and so-called transitional housing) for homeless people living with HIV/AIDS, which is administered by HRA's HIV/AIDS Services Administration; and
- <u>Shelter for homeless youth</u>, which is administered by the Department of Youth and Community Development.

(And, as noted above, the Department of Housing Preservation and Development administers shelters for people who become homeless due to fire, flood, or vacate order.)

Finally, DHS itself administers or plays a significant role in the provision of overnight accommodations for homeless people through two other programs: drop-in centers and so-called faith-based shelters. Data and information about those programs ought to be made public as well.

No one disputes that the children and adults residing in these taxpayer-funded and City-administered shelters are homeless. Nevertheless, for reasons having more to do with

agency labels and acronyms than with good public policy, their numbers have never been reported in a complete and accurate way.

Mayor Bloomberg and administration officials have, on many occasions, lauded the value of basing public policy on data and research, and the importance of measuring the results of City policies and practices. We agree strongly with these principles. And we believe that it does a disservice to New York City residents to provide them with misleading information about major problems like homelessness.

For this reason among others, we strongly support legislation that will require the City to make public accurate and complete data about homeless people residing in municipal shelters. We believe that, in its current version, Intro. 444 is a major step in that direction. However, as noted above, we believe the bill can be significantly enhanced to ensure that complete and accurate data about homelessness is made available to the public, and we will recommend such changes to the committee in a separate communication.

The City's Controversial and Misguided Evaluation Study of the Homebase Program

In closing, we welcome the opportunity to share our views of the City's controversial and misguided evaluation study of the seven-year-old Homebase program – a study that has resulted in 200 needy, at-risk families who sought help from the City being denied homelessness prevention services for at least two years. The study is, simply put, unethical and poorly-designed, and could and should have been conducted in a way that does not cause harm to vulnerable children and families.

The City's Homebase study was the subject of a September 29th article in the New York Daily News which reported that, as part of the study, some 200 vulnerable, at-risk households have been denied homelessness prevention services for up to two years as a "control group"; another 200 families were provided with prevention services. The Daily News article (please see copy attached) described one of the families who had applied for Homebase services and denied help for two years:

Single mother Angie Almodovar wasn't too pleased when she got the one-page form letter in August.

"It was like playing Russian roulette," said Almodovar, 27, who is pregnant and lives in a one-bedroom apartment in Mount Hope in the Bronx with her 8- and 1-year-old daughters.

She said she has called the agencies listed in the letter, and none could help.

Almodovar lost her job at an alarm company in 2008 and ran out of unemployment benefits over the summer. She went to Homebase in August while facing eviction because she owes \$3,400 in back rent, she said. "Homebase was my only chance," she said.

At a time of high unemployment and record homelessness in New York City, there is no question that prevention services are more needed than ever. There is also no question that City government should evaluate the effectiveness of services like those provided by the seven-year-old Homebase program. Indeed, we believe there is already strong evidence for the efficacy of prevention services like long-term rental assistance, legal services, and emergency grants to pay for rent arrears (although, unfortunately, the Homebase program provides only the latter of these services, and then in only a limited fashion).

However, such evaluations of City programs and services should never result in harm to needy people seeking help. Indeed, knowing what we do about the impact of homelessness on health and education, one wonders about the effect on the children and adults in the "control group" who will suffer homelessness, housing crises, and other hardships in the two years that they are denied services.

Unfortunately, in distressingly typical fashion, Bloomberg administration officials responded to the news reports and to widespread criticism of the study from elected officials and advocates by stubbornly, inflexibly, and aggressively defending the study. And just as unfortunately, administration officials have not been entirely forthcoming in their defense of the study.

Following are some of the claims that administration officials have made in defense of the Homebase study, along with some "reality-checking" of those claims:

- <u>Informed consent</u>: City officials have stated that the 200 households in the "control group" consented to join the study and, presumably, agreed to lose services for two years. Nothing could be further from the truth. In fact, affected families report that they were told they had to sign consent forms in order to have any chance at getting services if they did not sign, they would be turned away. Thus, desperate families facing homelessness felt that they had no choice but to sign the so-called consent forms. And to make matters worse, the families in the control group have not been given the choice of opting out of the study, something which is routine practice in research studies.
- Necessity of the study and of its current design: City officials have also claimed that the study is necessary to determine the effectiveness of the Homebase program, and that the current study design is the only way to do that. Again, nothing could be further from the truth. Countless social science research studies are conducted without, in effect, creating a "control group" by denying aid to people in crisis who are actively seeking help. Indeed, as a researcher recently commented, there are millions of poor New Yorkers and therefore no need to create a "control group" to study programs assisting low-income people; all the Homebase researchers had to do was find similarly-situated households who, for whatever reason, had never availed themselves of Homebase services. And, while there is no denying the need to evaluate the outcomes of government programs, it is curious that Bloomberg administration officials waited seven years to study the Homebase program, a program that they've effusively lauded for years in public testimony and in comments to the news media.

- Availability of Homebase services: City officials have also contradictorily claimed that, on the one hand, Homebase services are available elsewhere, so the denial of services for two years to the 200 "control group" households is not harmful; and second, many families are routinely turned away from Homebase programs, so these 200 families are no different than other turned-away families. The first claim is, on its face, not true City officials know all too well of the scarcity of homeless prevention services provided by overwhelmed and under-funded community organizations. But it also begs the question, Why should we have the Homebase program at all if its services are so widely available? The second claim fails to acknowledge that the "control group" households were, indisputably, eligible for Homebase services and would have received them if not for the existence of the study. Indeed, if Homebase programs do indeed turn away so many families, it raises another question: Why weren't some of those families included in the "control group"?
- Responsibilities of the researchers: City officials have touted the expertise of the City University of New York (CUNY) Graduate Center researchers and their private contractors, who are conducting the study. But while no one has questioned their academic expertise, there are troubling ethical questions about the design of the study. Indeed, the study design would seem to violate the human subject research guidelines which are posted on the CUNY Graduate Center's website. And it is unclear whether CUNY's Institutional Review Board ever reviewed or approved the study and how it created its "control group"; today's New York Times, in fact reports that the study was reviewed only by the private contractor hired to conduct it.
- Role of the Obama administration: Perhaps most aggravating of all, Bloomberg administration officials have injected politics into this debate by claiming, first, that the "Obama administration" made them do the study, and second, that the Federal government is doing the same kind of study nationwide. To the first point: While it is certainly true that the Federal Homelessness Prevention Program and Rapid Rehousing (HPRP) funds that currently finance most Homebase services did include funding for evaluation, it is absolutely untrue that Federal officials (much less "the Obama administration") directed the City of New York to conduct its study by denying help to needy families. And to the second point: The Federal study, which includes some 3,000 families nationwide, evaluates the success of the "rapid re-housing" portion of HPRP-funded services and studies the impact of such housing assistance on currently homeless families. In addition, it allows families to opt out of the study at any time. Thus, the Federal study does not deny help to families in crisis, and it is modeled on dozens of other proven, ethically-designed research studies about housing assistance.

It is also essential to recognize that the Homebase program has completely changed is functions over the years and is now in its third incarnation. These complete transformations were implemented without study or consultation with service providers. For instance, as a consequence of City budget cutbacks in FY 2009 which eliminated some case management services in hotels, Homebase offices now work to relocate families in hotels into permanent housing and no longer work with families applying for shelter at the PATH intake office in

order to divert them from the shelter system. Why did that change occur? There is much confusion in the community about what Homebase services are available and how one qualifies for services, quite apart from the study that is the subject of the hearing.

Indeed, from what we know, the Homebase study at issue is only looking at one variable: Did the household receive Homebase services or not. In fact, the various Homebase offices provide a range of services, and the effectiveness of the various services should be evaluated. (For example, some providers require families to undergo extensive financial counseling, to open a bank account, and to cut certain types of spending before they will provide rent arrears grants. How do we know whether or not such requirements are effective?)

Finally, the study ignores the impact of DHS's performance-based contracts, whereby the Homebase providers are reportedly paid around 40 percent of their budgets to relocate families from hotels – \$3,000 if families are relocated before 120 days, and far less if after 120 days. These contracts should also be evaluated. Providers report far less ability to serve families and individuals in the community who are at risk of homelessness because of these performance-based contracts, which consume resources that could be more effectively used to prevent homelessness.

We conclude with perhaps the only piece of good news regarding this troubling issue. Coalition for the Homeless, with the assistance of a Legal Services New York attorney, managed to halt the eviction of Ms. Almodovar and her family – and this is largely thanks to a rent arrears grant funded by the City Council's Homelessness Prevention Fund.

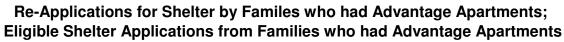
But there are still at least 199 other "control group" households in crisis, and the City knows how to reach those families. We urge the City to halt the misguided Homebase evaluation study and immediately provide vital prevention services to the children and families in the "control group."

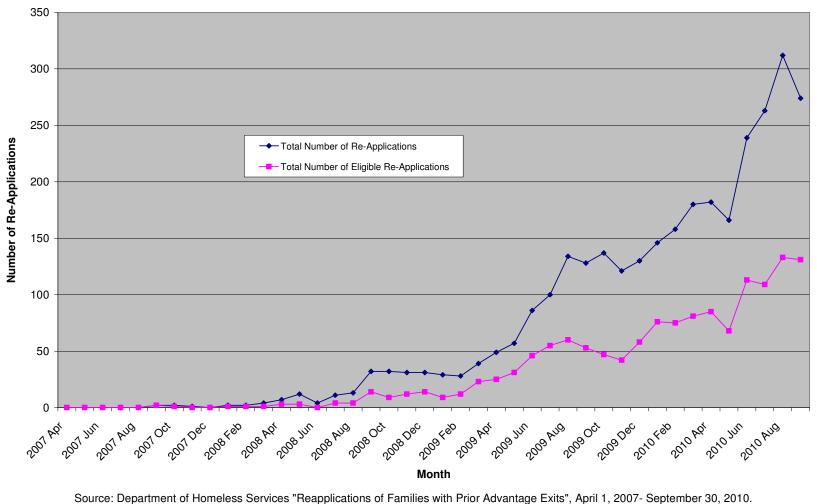
Thank you for the opportunity to share this testimony. And, as always, we look forward to working with the committee and the City Council in the coming months and years on efforts to reduce New York City's homeless population and help homeless children and adults.

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RE-APPLICATIONS FOR SHELTER BY ADVANTAGE FAMILIES, APR 2007-SEPT 2010

Month	Total Number of Re-Applications	Total Number of Eligible Re-Applications
2007 Apr	0	0
2007 May	0	0
2007 Jun	0	0
2007 Jul	0	0
2007 Aug	0	0
2007 Sep	2	2
2007 Oct	2	1
2007 Nov	1	0
2007 Dec	0	0
2008 Jan	2	1
2008 Feb	2	1
2008 Mar	4	1
2008 Apr	7	3
2008 May	12	3
2008 Jun	4	0
2008 Jul	11	4
2008 Aug	13	4
2008 Sep	32	14
2008 Oct	32	9
2008 Nov	31	12
2008 Dec	31	14
2009 Jan	29	9
2009 Feb	28	12
2009 Mar	39	23
2009 Apr	49	25
2009 May	57	31
2009 Jun	86	46
2009 Jul	100	55
2009 Aug	134	60
2009 Sep	128	53
2009 Oct	137	47
2009 Nov	121	42
2009 Dec	130	58
2010 Jan	146	76
2010 Feb	158	75
2010 Mar	180	81
2010 Apr	182	85
2010 May	166	68
2010 Jun	239	113
2010 Jul	263	109
2010 Aug	312	133
2010 Sep	274	131
TOTAL	3144	1401

Source: Department of Homeless Services "Reapplications of Families with Prior Advantage Exits", April 1, 2007- September 30, 2010.

DHS defines "families" as including families with children under 21, single pregnant women, and childless couples.