

Testimony of
Coalition for the Homeless

on

**Department of Homeless Services
Reporting Requirements**

Presented before
The New York City Report and Advisory
Board Review Commission

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May 11, 2012

Coalition for the Homeless welcomes this opportunity to testify before the Reports and Advisory Board Review Commission regarding whether the Commission should waive reporting requirements for two homeless-services related reports.

About the 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 3,000 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 900 nutritious meals each night to street homeless and hungry New Yorkers. 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 Callahan v. Carey and Eldredge v. Koch. In 1981 the City and State entered into a consent decree in Callahan 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 Callahan consent decree and 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 adults.

Reports to be Waived

The Report and Advisory Board Review Commission has recommended that two citywide reports on homelessness be waived. These reports were established by Local Law 19 of 1999 to provide valuable data on homeless services, including projected permanent housing needs and homeless outreach monitoring. The data provided in these reports are an important tool in analyzing and evaluating how New York City is providing services to its homeless population.

For both reports, a number of indicators are required to be published. Under the Permanent Housing Needs Report, the Commissioner of the Department of Homeless Services must

report to the speaker of the council in writing on the permanent housing and the transitional housing and services, respectively, projected to be needed to house homeless families and individuals Such annual report shall include... the sources, including... the department of housing preservation and development and the New York City housing authority, from which the commissioner of homeless services projects to meet the permanent housing [need] during such fiscal year and the number of permanent housing to be provided by each source.

This data gets at the heart of how the Department is addressing homelessness by identifying the projected shelter and permanent housing needs for each coming year. Indeed, such numbers would be helpful as a projection tool looking forward, but also, looking back on past reports, as a way to evaluate performance and adjust future projections.

The second report recommended for waiver, the Outreach Programs Report, requires the Department of Homeless Services to:

report to the speaker of the council in writing on the outreach programs operated by the department, by other city agencies or by entities contracting with the department. Such report shall include, but not be limited to, the number of contacts during the reporting period, the number of placements in transitional housing resulting from such contacts during the reporting period and the number of referrals of persons so contacted to programs or services during the reporting period.

The indicators in this report are highly valuable in assessing how the Department of Homeless Services is addressing street homelessness. Contracted providers are indeed currently required to keep track of this information, but providing it in a publicly accessible and unified format is what makes it useful for analysis and comparisons over time.

Valuable Indicators and Current DHS Reporting

The continued existence of these reports is important for several reasons. First, nowhere else are these specific indicators required by law to be reported. They are not included in DHS's most comprehensive public database, the Critical Activities Reports, or in the recently passed Local Law 37 Reports on NYCStat. Allowing the reports to lapse would risk DHS no longer tracking and reporting the data anywhere else.

Secondly, DHS has a shoddy record of providing data in a timely fashion without deadlines set by law. In May 2012, the latest Critical Activities data to be found on DHS's website was from June 2011—nearly a year out of date. At the same time, Local Law 37 Reports, which provide a narrower set of census-only data, are updated on a monthly basis.

Current State of Reports

Rather than discontinuing these reports, the Commission should require DHS to actually comply with the letter of the law within these reports. As they stand, the current reports gloss over or omit entirely some of the most important required information.

Compared to a comprehensive 10 pages documenting shelter capacity, the Permanent Housing Needs report utilizes just two paragraphs to report actual permanent housing needs. Moreover, this section entirely ignores permanent housing projections for families, offering no numbers for projected placements and no numbers for utilization of HPD and NYCHA units.

Likewise, the Outreach Programs Report omits nearly all of the indicators required by the law, reporting only on the number of chronically homeless individuals placed into permanent or temporary housing. The report omits the total number of outreach contacts, the breakdown between permanent and temporary housing placements, and the number of referrals to programs or services.

Recommendations

The goal of this commission is to waive reports that are considered redundant or no longer useful. However, neither of these DHS reports falls under this categorization. The data they are required to report are valuable for analyzing how New York City addresses homelessness. Moreover, the data cannot be found publicly anywhere else, including in the Critical Activities Reports, the Mayor's Management Reports, or the Local Law 37 Reports.

The real problem lies in the actual substance of the reports, which omits a substantial portion of required data. We therefore urge the Commission not to waive reporting requirements for either the Permanent Housing Needs Report or the Outreach Programs Report. Instead, we recommend that the Commission make sure the Department of Homeless Services actually complies with the letter of the law when creating and disseminating these particular reports.

Thank you for the opportunity to share this testimony. We look forward to working with the Committee on efforts to better report data on New York City homelessness.

Submitted by,

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