

# Proposed Consolidated Plan

2014 Executive Summary



**NYC**<sup>TM</sup> PLANNING  
DEPARTMENT OF CITY PLANNING CITY OF NEW YORK

*Effective as of August 15, 2014*

# Proposed Consolidated Plan

2014

Executive Summary



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**NYC**PLANNING  
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# Proposed 2014 CONSOLIDATED PLAN

August 15, 2014

## Executive Summary

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***Executive Summary  
Proposed 2014 Consolidated Plan  
One-Year Action Plan***

**Introduction**

The *Proposed 2014 Consolidated Plan One-Year Action Plan* is the City of New York’s annual application to the United States Department of Housing and Urban Development (HUD) for the four Office of Community Planning and Development entitlement programs: Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with AIDS (HOPWA).

**Submission of the Proposed Action Plan**

The 2014 Plan represents the fifth and final year of a five-year strategy for New York City’s Consolidated Plan years 2010 through 2014. The five-year strategy was articulated in Volume 2 of the 2010 Consolidated Plan.

New York City’s Consolidated Plan Program Year 2014 begins January 1, 2014 and ends December 31, 2014. According to federal Consolidated Plan regulations, localities are required to submit their Proposed One-Year Action Plan no later than 45 days prior to the start of the Program Year (November 15, 2013). *The City of New York submitted its Proposed Action Plan on November 15, 2013 as per federal regulations. However, in December 2013 HUD released temporary submission guidelines which required localities to formulate their Proposed Action Plans based on the actual Congressional appropriations for the given Federal Fiscal Year (FFY14). Since Congress had yet to finalize HUD’s FFY14 appropriations, the City was required to withdraw its submitted Action Plan and wait until Congress passed the appropriations bill before re-submitting the Proposed Action Plan. The temporary submission guidelines also indicated the submission deadline for Proposed Consolidated Plans based on the actual grant allocations was no later than August 16, 2014. The City of New York submitted to HUD its Proposed Plan reflective of the City’s actual grant allocations on August 15, 2014 as per the temporary guidelines.*

New York City’s 2014 grant requests for the respective entitlement programs are based on the grant amounts as appropriated by Congress. For the 2014 Program Year, the City expects to receive approximately \$272,324,200 from the four HUD formula grant programs; \$152,575,500 for CDBG, \$58,657,600 for HOME, \$48,441,500 for HOPWA, and \$12,649,600 for ESG. The following table summarizes the grant amounts expected to be awarded:

| <b>U.S. Department of Housing and Urban Development Formula Entitlement Grants</b> |   |                                |                        |                       |
|--|---|--------------------------------|------------------------|-----------------------|
| <b>Program</b>   | <b>Amount Expected to be Received in 2014</b> | <b>Amount Received in 2013</b> | <b>Difference (\$)</b> | <b>Difference (%)</b> |
| CDBG   | \$152,575,507                                 | \$155,708,779                  | (3,133,272)            | (2.01)                |
| HOME   | \$58,657,559,                                 | \$57,811,908                   | 845,651                | 1.46                  |
| ESG  | \$12,649,583                                  | \$10,921,293                   | 1,728,290              | 15.82                 |
| HOPWA  | \$48,441,549                                  | \$53,533,071                   | (5,091,522)            | (9.51)                |
| <i>Total</i>   | <i>\$272,324,198</i>                          | <i>\$277,975,051</i>           | <i>(5,650,853)</i>     | <i>(2.03)</i>         |

This represents an approximate \$5.6 million overall decrease in entitlement grant funds expected to be received from the City's 2013 Consolidated Plan Program Year grant awards. The decrease in the total expected amount is the result of decreases to two of the four formula entitlement grant programs' expected amount, particularly the decrease in the amount expected for the HOPWA program (a \$5 million reduction based on the program funds actually received in 2013) which offset a \$2.5 million increase in the amount expected for New York City's HOME and ESG programs.

These funds are primarily targeted to address the following eligible activities: housing rehabilitation and community development to maximize the preservation of the City's housing stock; the City's continuum of care for homeless single adults and homeless families; and housing opportunities and housing support services for persons with HIV/AIDS.

The New York City Consolidated Plan serves not only as the City's application for federal funds for four HUD Office of Community Planning and Development formula programs (CDBG, HOME, ESG and HOPWA), but also as the HOPWA grant application for three (3) surrounding counties within the New York Eligible Metropolitan Statistical Area (EMSA): Putnam; Rockland and Westchester. The County of Westchester administers the HOPWA funds for the cities of Mount Vernon, New Rochelle, and Yonkers which are incorporated within its boundaries.

### Institutional Structure

The New York City Department of City Planning is the lead agency in the City's Consolidated Plan application process and is responsible for the formulation, preparation and development of each year's proposed Consolidated Plan. City Planning coordinates Plan-related activities between the Consolidated Plan Committee member agencies and the federal government.

The four federal entitlement programs, CDBG, HOME, HOPWA and ESG, are administered by the following City agencies respectively, Office of Management and Budget (OMB), the Department of Housing Preservation and Development (HPD), the Department of Health and Mental Hygiene – Bureau of HIV/AIDS Prevention and Control (DOHMH-BHAPC), and the Department of Homeless Services (DHS).

In addition, the New York City Housing Authority (NYCHA), using primarily Public Housing Capital funds, administers public housing new construction, rehabilitation and modernization activities, and home ownership opportunity programs, along with a Section 8 rental certificate and voucher program for its tenant population. Furthermore, the City of New York's Continuum of Care for the Homeless and Other Special Needs Populations is administered by various City Agencies, each according to their respective area of expertise. The supportive housing programs and services are funded primarily with City (capital and/or expense) and/or State funds.

The Department of Homeless Services (DHS) coordinates social and physical services for homeless families and individuals. Programs for runaway and homeless youth and children aging out of foster care are administered by the Department of Youth and Community Development (DYCD), and Administration for Children's Services (ACS), respectively.

The Human Resources Administration (HRA) provides a range of public benefits and social services which assist in homeless prevention and/or diversion. These are often delivered in conjunction with government sponsored housing efforts. Through HRA's HIV/AIDS Administration (HASA), HRA provides emergency and supported housing assistance and services for families, single adults and children with HIV-related illness or AIDS. The City's Department of Health and Mental Hygiene - Division of Mental Hygiene, along with the State's Offices of Mental Health (OMH), the Office for People With Developmental Disabilities (OPWDD)

(formerly the Office of Mental Retardation and Developmental Disabilities (OMRDD)), and Office of Alcoholism and Substance Abuse Services (OASAS); plans, contracts for and monitors services for these disability areas and provides planning support to OASAS in the field of substance abuse services. Several other City Agencies address the concerns of targeted groups of citizens by providing housing information and supportive housing services assistance, such as the Department of the Aging (DFTA) (the elderly and frail elderly), the Mayor's Office for People with Disabilities (MOPD) (persons with a disability), and the Mayor's Office to Combat Domestic Violence (MOCDV) (victims of domestic violence).

### Summary of Annual Objectives

For the 2014 Consolidated Plan program year the City of New York is required to use HUD's Performance Outcome Measurement System. The Performance Outcome Measurement System was developed to enable the U.S. Department of Housing and Urban Development to collect and aggregate standardized performance data on entitlement-funded activities from all entitlement grantees nationwide for use in reporting to Congress on the effectiveness of its formula entitlement programs in meeting the Department's strategic objectives.

The outcome performance measurement system includes objectives, outcome measures and performance indicators that describe the intended outputs of the various entitlement funded activities. There are three (3) objectives: creating Suitable Living Environment; providing Decent Affordable Housing; and Creating Economic Opportunities which, combined with the three (3) performance outcome categories, Accessibility/Availability; Affordability; and Sustainability, create nine (9) performance measurement statements. The nine performance outcome measurement statements are:

- Accessibility for the purpose of providing Decent Affordable Housing
- Affordability for the purpose of providing Decent Affordable Housing
- Sustainability for the purpose of providing Decent Affordable Housing
- Accessibility for the purpose of creating Suitable Living Environments
- Affordability for the purpose of creating Suitable Living Environments
- Sustainability for the purpose of creating Suitable Living Environments
- Accessibility for the purpose of creating Economic Opportunities
- Affordability for the purpose of creating Economic Opportunities
- Sustainability for the purpose of creating Economic Opportunities

In addition to determining the performance outcome measurement, the System requires entitlement grantees to collect and enter into the HUD Integrated Disbursement and Information System (IDIS) accomplishment data according to eighteen (18) federally-defined Performance Indicator categories. Performance Indicator categories encompass housing construction and rehabilitation, public services and facilities, business/economic development, and homelessness prevention-related activities.

It is important to note that while the eighteen Performance Indicator Categories are designed to capture a majority of the eligible entitlement-funded activities a grantee may undertake, they do not capture every eligible activity. Therefore, due to the limitations of the Performance Indicators there are entitlement-funded activities which the City of New York intends to undertake in the 2014 Consolidated Plan Program Year which will not be captured by the Performance Outcome Measurement System. Consequently, the number of households and persons positively impacted by the City's overall efforts are expected to be much higher than can be identified under the Performance Indicator criteria. As a result of the Performance Outcome Measurement System's inability to categorize all eligible entitlement-funded activities, the amount of entitlement funds the City of New York expects to expend according to the nine performance outcome objective statements will be less than the

total amount of entitlement funds the City of New York expects to receive for the 2014 Consolidated Plan program year.

For eligible program activities for which there is no appropriate HUD Performance Indicator in the Performance Outcome Measurement System, the City will reflect the proposed accomplishments by identifying the specific activity undertaken by the program. For example, because there is no suitable HUD indicator to reflect the CDBG-funded Land Restoration Program's activities, the Accomplishment Chart in the One-Year Action Plan's Description of Program Variables Table (Section I.C.a) will state: *No Appropriate HUD Indicator (Number of Acres Treated: 280)*. For these programs, program progress in addressing the City of New York's priorities and objectives as described in its five-year Consolidated Plan Strategic Plan will continue to be measured and reported in the Consolidated Plan Annual Performance Report (APR) by comparing its Proposed Accomplishment as described in the Consolidated Plan Action Plan Accomplishment Chart against its Actual Accomplishment.

Lastly, it is important to recognize that some households may benefit multiple times from various public service activities. Unlike activities such as rental assistance or housing production, where it is reasonable to expect that beneficiaries will not be double-counted, many households may receive multiple forms of assistance through a combination of either entitlement-funded public service, public facility or targeted area revitalization activities. As a result, if the reader attempts to aggregate the number of low-/moderate-income households and persons benefiting from entitlement-funded programs categorized as public service, public facility or targeted area revitalization activities, the aggregated number of households and persons benefiting from these activities may actually be greater than the actual number of low-/moderate-income households and persons residing in New York City. Therefore, the reader is advised to interpret aggregated data with caution.

### Summary of Annual Use of Grant Funds

Housing costs in New York City are some of the highest in the country and its housing stock is some of the oldest. The City is committed to easing the financial hardships low- and moderate-income families face in finding affordable decent housing by creating new and preserving existing housing units. As a response to the segment of New York City's housing stock that is older and in substandard condition, the City has devised programs which strive to remediate the City's deteriorating housing stock. To that end, the City of New York allocates a portion of its HUD entitlement grants to increasing accessibility, affordability, and to sustaining decent affordable housing in city neighborhoods. The City proposes to allocate a total of **\$46,514,700** during the 2014 calendar year to activities whose mission is to provide accessibility to decent affordable housing units. In 2014, the City will also spend approximately **\$91,496,500** to provide affordability of decent, affordable dwelling units and **\$52,898,000** to fund activities that work to sustain the City's housing stock.

Although safe affordable housing is a crucial component to improving the lives of New Yorkers, the City allocates a large share of HUD entitlement funds to community redevelopment programs as part of a holistic approach to enhancing the living environment found within the City. The programs are broad in scope but serve to generate vital, healthy, safe city neighborhoods. During the 2014 calendar year, **\$30,609,302** in total will be allocated to activities that provide access to a suitable living environment. A total of **\$2,963,000** will be used to promote affordable suitable living environments and **\$10,018,000** will be used for activities targeting sustainable living environments.

HUD entitlement grant dollars will also be apportioned to activities designed to foster economic recovery and enrich job prospects for city residents through business enhancement grants, education and worker training programs, and targeted commercial revitalization. In 2014, the City will spend **\$4,284,000** on activities that provide access to economic opportunity for low- and moderate-income New Yorkers.

The City of New York expects to receive approximately \$152,575,500 for CDBG programs, \$58,657,583 for HOME programs, \$12,649,583 for ESG programs, and \$48,441,549 for HOPWA programs. Housing and Urban Development entitlement grants provided to the City of New York are expected to achieve the following objectives and outcomes:

#### Community Development Block Grant

- Four programs expect to receive a cumulative total of \$1,024,000 for the purpose of providing accessibility to decent affordable housing.
- Seven programs expect to receive a cumulative total of \$39,262,000 for the purpose of providing affordability for decent affordable housing.
- Four programs expect to receive a cumulative total of \$48,764,000 for the purpose of providing sustainability of decent affordable housing.
- Twelve programs expect to receive a cumulative total of \$22,704,000 for the purpose of creating/improving accessibility to suitable living environments.
- One program expects to receive a total of \$2,963,000 for the purpose of creating/improving affordability for suitable living environments.
- Six programs expect to receive a cumulative total of \$10,018,000 for the purpose of creating/improving sustainability of suitable living environments.
- Three programs expect to receive a cumulative total of \$4,284,000 for the purpose of creating/improving accessibility to economic opportunity.
- Four programs for which there is no appropriate HUD Performance Indicator and, therefore, no applicable HUD defined outcome/objective statement, expect to receive a cumulative total of \$51,811,000 to undertake CDBG-eligible activities.
- The remainder of CDBG funds, \$39,244,000 will be used for program administration and planning and, therefore, is not applicable to HUD defined outcome/objective statements.

#### HOME Investment Partnership

- Five programs expect to receive a cumulative total of \$43,418,761 for the purpose of providing accessibility to decent affordable housing.
- Four programs expect to receive a cumulative total of \$7,287,845 for the purpose of providing affordability of decent affordable housing.
- Two programs expect to receive approximately \$2,085,200 for the purpose of providing sustainable decent affordable housing.
- The remainder of HOME funds, approximately \$5,865,800, will be used for program administration and planning and, therefore, is not applicable to HUD defined outcome/objective statements.

#### Emergency Solutions Grant

- One program expects to receive a cumulative total of \$2,071,955 for the purpose of providing accessibility to decent affordable housing.
- One program expects to receive a cumulative total of \$2,048,845 for the purpose of providing sustainability for decent affordable housing.
- Two programs expect to receive a cumulative total of \$7,905,302 for the purpose of providing accessibility for suitable living environments.
- The remainder of ESG funds, approximately \$623,500, will be used for program administration and project management and, therefore, is not applicable to HUD defined outcome/objective statements.



### Housing Opportunities for Persons with AIDS

- Three programs expect to receive a cumulative total of approximately \$44,946,700 for the purpose of providing affordability for decent affordable housing.
- The remainder of HOPWA funds, approximately \$1,390,100, will be used for program administration and planning and, therefore, is not applicable to HUD defined outcome/objective statements.

### Summary of Funding

In total, over **\$2 billion** in combined funds is expected to be received in 2014. The four formula grants previously discussed account for approximately **\$339.822 million** of this figure.

Other Federal Funds include New York City Housing Authority (NYCHA) public housing authority funds, and HUD Competitive Grant program monies.

#### Summary Table of Funding Sources

|                          | Amount City Expects<br>to Receive in 2014 | Amount City Expects<br>to be Received by<br>Other Entities in 2014 |
|--------------------------|---|--|
| Total Federal            |   |  |
| CDBG                     | \$ 220,074,000 *                          | \$ 0   |
| HOME                     | \$ 58,657,553                             | \$ 0   |
| ESG                      | \$ 12,649,583                             | \$ 0   |
| HOPWA                    | \$ 48,441,549                             | \$ 0   |
| NYCHA Funds              | \$ 0                                      | \$ 270,369,594   |
| HUD Competitive          | \$ 372,630,877                            | \$ 1,366,694   |
| Total State              | \$ 12,500,000                             | \$ TBD   |
| Total City               | \$ 990,304,036                            | \$ 0   |
| Total Private            | \$ 0                                      | \$ 57,953,074  |
| <b>Total All Sources</b> | <b>\$ 1,715,257,598</b>                   | <b>\$ 329,689,362</b>  |

\* Includes \$67,498,500 in program revenue expected to be available through prior year accruals and program income.

### Addendum

#### Affirmatively Further Fair Housing

An addendum to the Affirmatively Furthering Fair Housing (AFFH) Statement One-Year Update originally incorporated into the Proposed 2013 Consolidated Plan Annual Performance Report (APR), (released March 31, 2014) has been included in the Proposed Action Plan, Volume 3.

The Addendum includes an updated Analysis of Impediments to Affordable Housing, and to Fair Housing respectively, and Actions to Remove Impediments. The Actions to Remove Impediments contains elements of Mayor de Blasio's *Housing New York: A Five-Borough, Ten-Year Plan*. The Mayor's Plan set a ten-year goal for the construction or preservation of 200,000 units of affordable housing, approximately 70% of which would serve households at or below 80 percent of the Area Median Income (AMI). In the plan, possible impediments were identified that, if removed, would facilitate the achievement of this ambitious affordable housing goal.

## Citizen Participation

### In the Consolidated Plan Formulation Process

In accordance with federal regulations 24 CFR 91.105(e)(1), regarding Consolidated Plan citizen participation requirements, the City of New York conducted a public hearing to solicit comments on the formulation of the *Proposed 2014 Consolidated Plan*, on April 15, 2013.

New Yorkers were invited to attend and participate in the formulation and development of the Consolidated Plan in several ways. Over 1,800 notification letters were sent to New York City residents, organizations and public officials inviting participation in the public hearing. In addition, notices of the previously mentioned activity were published in three local newspapers, one English-language, a Spanish-language, and a Chinese-language daily, each with citywide circulation. Furthermore, a notice was placed as a public service message on the New York City-operated local cable television access channel. The respective notices included relevant Plan-related information so that informed comments are facilitated.

### In the Public Comment Review Period and Public Hearing

In order to notify the public of the release of the Proposed Consolidated Plan for public review and of the federally-required public hearing on the contents of the document, the City utilized the same notification methods as it did to announce the public hearing for the formulation of the Proposed Plan. Furthermore, the respective notices included relevant Plan-related information so that informed comments are facilitated. Lastly, copies of the *Proposed 2014 Consolidated Plan* are mailed to both the Chairperson and District Manager of each of the City's 59 Community Boards.

To provide public access to the document, copies of the *Proposed 2014 Consolidated Plan* could be obtained at the **City Planning Bookstore**, 22 Reade Street, New York, New York 10007, Phone: 212-720-3667, (Monday 12:00 pm to 4:00 pm, Tuesday through Friday 10:00 am to 1:00 pm) or any of the New York City Department of City Planning borough offices.

In addition, copies of the Proposed Consolidated Plan were made available for reference in the City's Municipal Reference & Research Center (the City Hall Library), and the main public library in each of the five boroughs. (The locations of the respective libraries are provided at the end of the Summary).

Furthermore, the Department of City Planning posted the *Proposed 2014 Consolidated Plan* on the Department's website in Adobe Acrobat format for review by the public. The Internet-based version may be accessed at:

**<http://www.nyc.gov/planning>**

The public comment period began October 10, 2013 and extended for 30 days ending November 8, 2013.

The public hearing on Proposed 2014 Consolidated Plan was conducted as scheduled on November 8, 2013, 2:30 p.m., in Spector Hall, at the Department of City Planning, 22 Reade Street, Manhattan. The announced question and answer session with City agency representatives in attendance followed.

The public was instructed to submit their written comments on the *2014 Proposed Consolidated Plan* by close of business, November 8, 2013 to: Charles V. Sorrentino, New York City Consolidated Plan Coordinator, Department of City Planning, 22 Reade Street 4N, New York, New York 10007, FAX: (212) 720-3495, email: [Proposed2014ConPlan@planning.nyc.gov](mailto:Proposed2014ConPlan@planning.nyc.gov).

A summary of public comments from the public comment period, the public hearing and agencies' responses was to be incorporated into the version of the *Proposed 2014 Consolidated Plan* submitted to HUD. However, no public comments were received from either the public hearing or public comment period.

#### In the Additional Proposed Consolidated Plan Public Comment Review Period

*The Proposed 2014 Consolidated Plan was modified to incorporate an addendum to the 2013 Consolidated Plan Annual Performance Report's Affirmatively Furthering Fair Housing (AFFH) Statement One-Year Update. The addendum includes an analysis of New York City's policies and practices which may act as regulatory impediments to the production of affordable housing. The analysis is drawn from the Mayor's May 2014 publication, Housing New York: A Five-Borough, Ten-Year Plan, which establishes a ten-year housing goal of creating or preserving 200,000 affordable housing units.*

*In order to notify the public of the release of the Addendum for public review, the City utilized the same notification methods as it did to announce the public review for the Proposed Plan.*

*The public comment period began July 10, 2014 and extended for 30 calendar days ending August 8, 2014.*

*The public was instructed to submit their written comments on the Addendum to the Proposed 2014 Consolidated Plan by close of business, August 8, 2014 to: Charles V. Sorrentino, New York City Consolidated Plan Coordinator, Department of City Planning, 22 Reade Street 4N, New York, New York 10007, FAX: (212) 720-3495, email: [Proposed2014ConPlan@planning.nyc.gov](mailto:Proposed2014ConPlan@planning.nyc.gov).*

### Summary of Citizens' Comments/Agencies' Responses

#### Comments from the Public Hearing on the Formulation of the Proposed Consolidated Plan

The hearing began with opening remarks and the floor was then opened to testimony to those in attendance. However, no member of the public gave testimony. The hearing was concluded after the Consolidated Plan Committee member agencies' representatives waited a sufficient period of time to permit persons who may have been en route to the hearing the opportunity arrive and provide their testimony.

#### Comments from the Public Hearing on the Proposed Consolidated Plan

The hearing began with opening remarks and the floor was then opened to testimony to those in attendance. However, no member of the public gave testimony. The hearing was concluded after the Consolidated Plan Committee member agencies' representatives waited a sufficient period of time to permit persons who may have been en route to the hearing the opportunity arrive and provide their testimony.

#### Comments from the Public Comment Review Period for the Proposed Consolidated Plan

No comments regarding the Proposed 2014 Consolidated Plan were received during the Public Comment Period.

#### Comments from the Public Comment Review Period for the Addendum: Affirmatively 2013 Consolidated Plan Annual Performance Report's Affirmatively Furthering Fair Housing (AFFH) Statement One-Year Update.

An advocacy organization for the disabled community provided remarks concerning the City's allocation of federal-source funding for housing for people with disabilities; and also remarks on the City's citizen participation process. The writer stated that the description of Consolidated Plan activities contained little detailed discussion of funds allocated, or the percentage or number of apartments to be made available to low- or extremely low-income people with disabilities.

The organization advocated the inclusion of people with disabilities in the supportive housing planning process, and desired the opportunity to provide input into the formulation of the 2015 Consolidated Plan Five-Year Strategic Plan. The writer also advocated the development of supportive housing for persons who did not meet the eligibility criteria for various City and State funded supportive housing programs, such as the development of units for people with chronic (but not acute) mental illness or individuals with cognitive disabilities who are not eligible for OPWDD (NYS Office for People With Developmental Disabilities) housing.

The writer indicated her organization's concern regarding the need to perform licensing oversight of supportive housing programs within DOHMH (New York City Department of Health and Mental Hygiene) or OMH (New York State Office of Mental Health). In addition, she stated that there is no indication of monitoring of ADA compliance for these units and inquired how, if any, compliance is assured.

In closing, the organization was of the opinion that although they encourage the Mayor's Office of People with Disabilities to continue to refer people with disabilities to them, the Mayor's Office should also serve as a client advocacy/placement office for prospective clients themselves.

The Department of Housing Preservation and Development responded to the organization's first two (2) issues. Concerning the issue that the Consolidated Plan "... fails to mention the allocation of funds and percentage or number of apartments made available to people with disabilities living with extremely/severely low-income or low-income." the City is committed to supporting the creation of accessible apartments for New Yorkers with disabilities and removing barriers to their sharing in the City's affordable housing resources. HUD issues regulations for states and localities to follow in preparation of the Consolidated Plan. The information contained in the Consolidated Plan adheres to those requirements.

HUD also requires states and localities to comply with further laws and regulations that govern federal programs that provide affordable housing, including housing for people with disabilities. The most significant of these are the Fair Housing Act and Section 504 of the Rehabilitation Act of 1973.

The City of New York agrees with CID-NY that engagement of all residents in the planning process is essential. ("CIDNY hopes to see that people with disabilities are invited to the table to help develop the next five-year plan.")

Public hearings on the Consolidated Plan are required on at least two occasions during the year. The hearings focus on housing, homeless, supportive services, and community development needs; development of proposed activities; and review of program performance.

The Department of City Planning held its first public hearing on the Proposed 2014 Consolidated Plan on April 15, 2014; it was held to serve as a preparatory public hearing to garner input from the community as the City prepared its proposed Consolidated Plan. The City invited CID-NY, along with 2,000 other stakeholders in the Plan, via U.S. Postal Service mail.

The City also held an additional public hearing on the 2014 Proposed Consolidated Plan, which took place on November 8, 2013. The City invited CID-NY to that hearing as well, along with 2,000 other stakeholders in the Plan, via U.S. Postal Service mail.

Notice of the hearings always include details of locations where the public may obtain copies of the Plan. The hearings are held at times and locations that are convenient to the population and provide accommodation for persons with a disability, including a sign-language interpreter. The City will identify how the needs of non-

English speaking residents will be met where public hearings can be reasonably expected to be attended by a significant number of non-English speaking residents.

The Consolidated Plan, when finalized, will include consideration of any comments or views received in writing, or orally at the public hearings, in preparing the Consolidated Plan. Attached to the Plan will be a summary of the public's comments or views, including comments or views not accepted, and the reasons for non-acceptance.

As a matter of course, the public is invited to contact any City agency at any time of year to request an opportunity for input into the Consolidated Plan process.

The Department of City Planning responded to the organization's request for input into the formulation into the Proposed Consolidated Plan. The City of New York provides the public and not-for profit organizations the opportunity to at various times throughout the Consolidated Planning process.

Annually, the City conducts a public hearing to solicit comments and input from the public prior to the formulation of the Proposed Consolidated Plan. The public hearing on the formulation of the Proposed 2015 Consolidated Plan Five-Year Strategic Plan and One-Year Action Plan was conducted on Friday, April 11, 2014. Public Notices announcing the event were distributed to over 2,000 elected officials, concerned citizens and not-for-profit organizations (including the writer's organization).

In addition, the respective city agencies which comprise the New York City Consolidated Plan Committee individually conduct citizen participation outreach activities relating to their own agency's area of expertise. The agencies convene advisory boards comprised of stakeholders to solicit input. Input from these advisory boards assists the respective agencies in their program development. In closing City Planning requested the writer to please refer to the Proposed 2014 Consolidated Plan, Volume 2, Part II.A., Citizen Participation for additional information on opportunities to participate.

Department of Homeless Services (DHS) responded to the organization's request to participate in the development of supportive housing programs. The mission of the New York City Coalition on the Continuum of Care (NYC CCoC) is to provide a leadership role in the prevention and eradication of homelessness in New York City. It is a broad-based coalition of homeless housing and shelter providers, consumers, advocates, and government representatives, working together to shape citywide planning and decision making. The Steering Committee of the NYC CCoC is governed by its bylaws, which we invite you to read on the NYC CCoC's website ([www.nychomelss.com](http://www.nychomelss.com)).

The business of the NYC CCoC is managed by the three (3) Co-Chairs and a 27-member Steering Committee. The twenty-seven members are as follows:

1. Eight Government Representatives
2. Eight Consumer Representatives
3. Eight Coalition Representatives
4. Three At-Large Representatives

As stated in the Steering Committee bylaws, a coalition is a group of at least five organizations that has come together with a priority to advocate for services and/or needs of homeless individuals and families. It must meet the following criteria:

1. A mechanism for new members to join;
2. Independent organization with its own system of governance, i.e., elected officers, board of directors/steering committee, bylaws;

3. Conduct meetings at least four times a year;
4. Has a purpose beyond being a voting member of the NYC CCoC;
5. Must directly or indirectly represent a homeless subpopulation, program type or specific unmet need;
6. The Coalition's mission statement and minutes of its last three meetings must reflect that the group is actively engaged in planning and advocacy on behalf of the identified group/need to be represented; and
7. Subcommittees of a coalition cannot be a separate coalition.

As such, the advocacy community has a strong voice and an almost one-third representation on the NYC CCoC.

The at-large representatives must demonstrate their interest in ending homelessness in NYC and have expertise that will be of value to the NYC CCoC. These members are also elected via the process outlined in the Steering Committee bylaws. The elections are publicized via the website, outreach and anyone is welcome to apply.

The consumer committee of the NYC CCoC elects eight (8) representatives and eight (8) alternates for a total of sixteen (16) individuals to the Steering Committee. Every effort will be made to include members who fit into a wide range of categories, including but not limited to:

1. Chronically Homeless
2. Domestic Violence
3. HIV/AIDS
4. Mental Health
5. Permanent Housing
6. Substance Use
7. Veterans
8. Youth

Membership on the Consumer Committee of the NYC CCoC is open to any individual who identifies as formerly or currently homeless or is accessing homeless services. Furthermore, their meetings are open to the public and they welcome outside interests in their activities. If you have any questions or would like to attend a meeting, please contact our Consumer Committee Co-Chairs whose information can be found on the NYC CCoC's website.

The New York City Coalition on the Continuum of Care Steering Committee meets almost every third Friday of the month (check the aforementioned website to confirm), 9:30am - noon. Meetings alternate between being Voting Member only and being open to the Larger Community. Meetings open to the larger community are currently held at the American Red Cross 520 W 49<sup>th</sup> St New York, NY.

The Department of Health and Mental Hygiene (DOHMH) participates in inclusive forums which advance the needs of people with disabilities in the housing planning and policy process. These include NYC CoCC, monthly forums in between the Bureau of Mental Health and people; with disabilities, and annual Agency wide planning forums. The Office of Consumer Affairs is an independent advocate for people with disabilities. Prior to the initiation the NY/NYIII initiative disability groups provided input which help shape the RFP and subsequent service standards.

DOHMH also responded to the writer's expressed concern regarding "licensing oversight". Licensing is used in transitional State Office of Mental Health Housing (SOMH) which has a rehabilitative orientation and is time limited. Supportive Housing by nature is permanent with voluntary supports. SOMH and DOHMH both require tenant choices which are adaptive to needs. The DOHMH Office of Program Review and Evaluation annually reviews and rates the quality of service delivery at contracted programs and requires corrective action plans if

programs do not meet environmental requirements. A program review takes into account the rights of disabled individuals and the contracted agencies capacity to meet the individuals rights.

In closing, the Mayor’s Office for People with Disabilities (MOPD) agrees that advocacy groups; including CIDNY and similar organizations, such as other Independent Living Centers and Not for Profit Organizations, need to be part of the process relating to the formulation of the next Five Year Consolidated Plan. MOPD relies on involvement of the constituents we serve.

Regarding the issue of referrals, MOPD continues to work with all levels of city government, and utilizes all resources available, within the city to assist constituents including Finance, HPD, etc. We rely on our community partners to engage constituents who have exhausted all options. We continually send constituents over to CIDNY as needed.

**Additional Information**

Copies of the *Proposed 2014 Consolidated Plan* are available for reference at the following public libraries:

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| <b><i>NYC Municipal Reference &amp; Research Center<br/>(The City Hall Library)</i></b><br>31 Chambers Street, Suite 110<br>New York, NY 10007<br>(212) 788-8590 | <b><i>Science, Industry and Business Library</i></b><br>188 Madison Avenue at 34 <sup>th</sup> Street<br>New York, N.Y. 10016<br>(212) 592-7000 |
| <b><i>Mid-Manhattan Library</i></b><br>455 Fifth Avenue (at 40 <sup>th</sup> Street)<br>New York, N.Y. 10016<br>(212) 340-0863                                   | <b><i>Bronx Reference Center</i></b><br>2556 Bainbridge Avenue<br>Bronx, N.Y. 10458<br>(718) 579-4257   |
| <b><i>(Brooklyn) Central Library</i></b><br>Grand Army Plaza<br>Brooklyn, N.Y. 11238<br>(718) 230-2100   | <b><i>Queens Central Library</i></b><br>89-11 Merrick Boulevard<br>Jamaica, N.Y. 11432<br>(718) 990-0778/0779/0781                              |
| <b><i>St. George Library Center</i></b><br>5 Central Avenue<br>Staten Island, N.Y. 10301<br>(718) 442-8560   |   |

Any questions or comments concerning the City’s Consolidated Plan may be directed to:

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