



THE COUNCIL
OF
THE CITY OF NEW YORK
CITY HALL
NEW YORK, NY 10007

CHRISTINE C. QUINN
SPEAKER

TELEPHONE
212-788-7210

July 22, 2013

Gloria Langlais
NYC Department of Homeless Services
33 Beaver Street, 17th Floor
New York, NY 10004

Dear Ms. Langlais:

We are writing to comment on the proposed amendment to the Department of Homeless Services (DHS) rules related to homeless shelters for single adults. The proposed rule to amend Title 31 of the Rules of the City of New York by adding Chapter 3 seeks to establish a procedure for determining whether single adults who return to the shelter system after an absence of thirty days or more are truly in need of shelter or whether they have alternative housing options. We are concerned, however, that implementing this policy will create barriers for single adults seeking shelter, and will result in a denial of temporary shelter to many homeless single adults who need it. As a result, we ask that the proposed policy not be implemented.

In general, the proposed procedure for determining whether a single adult should be referred to a diversion office is vague. DHS shelter staff may determine “based on the entirety of the [client’s] circumstances,” whether the client will return to his or her last shelter placement or will go to a diversion office. The proposed rule does not explain which shelter staff will make such a determination or what specific factors will be considered. While the rule sets forth certain categories of people who will be excepted from a resource assessment upon their return, it is unclear for some of those categories how such factors will be considered. For example, the rule does not describe how DHS staff will determine whether a client has a mental or physical disability, or the process for determining whether someone has been evicted or is a victim of domestic violence.

In multiple City Council hearings, the Council has heard testimony criticizing DHS for failing to accurately assess alternative housing options for families with children and improperly denying shelter to homeless families. In many cases, DHS determined that a family had another place to stay, only to find that they were forced to sleep in a public place or on the street. Until we are assured that DHS can make such determinations appropriately and accurately, we cannot support a new procedure that would subject single adults to a similar analysis.

Accordingly, we request that DHS not proceed with the proposed rule. Thank you for your consideration.

Sincerely,

Christine C. Quinn
Speaker

Annabel Palma
Chair, General Welfare Committee