

Where We Live NYC

Fair Housing Stakeholder Group

Create Phase Roundtables Synthesis

About

This document summarizes the main ideas shared by the Fair Housing Stakeholder Group at the Create Phase Roundtables, held in November and December 2018, and supplemented by one-on-one meetings with stakeholders in January 2019. The roundtables covered the following topics: Segregation and Integration; Disproportionate Housing Needs; Education; Healthy and Safe Environments; Employment and Economic Opportunity; and Transportation. The four sections of this document include summaries of stakeholders' (1) visions of success, (2) feedback on new data visualizations of residential living patterns, (3) input on how to define neighborhood opportunity, and (4) recommended solutions, organized by contributing factors and their respective issues.

Stakeholders' Visions of Success

When asked what stakeholders envisioned as "success" in terms of segregation and integration in New York City, **participants had mixed opinions** about the relevance of having more racially/ethnically integrated neighborhoods, questioning who benefits and burdens, particularly in the context of gentrification, discrimination, and loss of culture. Nevertheless, participants **shared common aspirations of what the "long-run success" of affirmatively furthering fair housing** initiatives could look like:

- **Choice, power, and self-determination for historically excluded groups**, on where and how they can live and what happens in their neighborhood.
- **Equitable neighborhood amenities and investments that address historic disinvestment and provide access to opportunity:** Where people have what they need to fully access resources to overcome poverty, build wealth, and enable better lives for their children. “...mobility out of poverty should not mean having to leave your neighborhood.”
- **A stable home and community for all to thrive:** Where everyone, especially people of color, immigrants, trans- and gender non-conforming individuals, domestic violence survivors, people with disabilities, those undocumented, and other historically marginalized groups, can have safe, permanent affordable housing and feel rooted in a community, without struggling to make ends meet or fear displacement; reduced isolation, especially for public housing residents.
- **Truly accessible, affordable, and independent living options for people with disabilities in integrated settings,** beyond institutions; all future apartments, buildings, infrastructure, and services, to be accessible to different types of disabilities; opportunities for people to age in place. “Living in institutions is something I want to move away from. Everyone deserves to be integrated.”
- **Reduced racial disparities** in education, wealth, health, justice-involvement, and overall life outcomes that are driven by where people live; reduced disparities for people with disabilities and other protected classes.
- **Diverse and inclusive neighborhoods, free of discrimination:** An end to systemic, institutional, and interpersonal systemic racism, including NIMBYism; communities coming together to solve problems. “...power to be distributed more equitably... an increase in power in decision-making for those traditionally excluded.”

Analyzing Segregated and Integrated Living Patterns

This section summarizes discussion at the Roundtable on Segregation and Integration on stakeholders' response to new data visualizations of residential living patterns which illustrate segregated and integrated living patterns over time relative to the concentration of the White population in New York City, as well as racial composition in relation to high and low percentages of poverty. These maps can be found online at nyc.gov/wherewelive.

Overall, stakeholders felt that the new maps better illustrated the segregated and integrated living patterns across the city, but suggested the following to create a clearer narrative:

- **Label maps with neighborhoods** to make it easier to read and interpret.
- **Replace the label 'Majority non-white areas' with 'Majority people of color,' and be more specific of each district's racial/ethnic make-up,** rather than labeling "homogeneous" or "heterogeneous."
 - Stakeholders felt it was particularly important to evaluate the absence of Black residents. Some neighborhoods seem 'integrated,' but only for White, Asian, and Hispanic residents.
- **Explore more nuanced cut off points** that could show the differences between segregated neighborhoods.
- **Note the direction of change and highlight the neighborhoods that have most or least changed.** Clarify who may have moved in and out (e.g., percent increase in white and non-white population, versus populations that decreased), and potential reasons related to local history.
 - Stakeholders wanted to see a clearer narrative of why changes happened in different areas.
 - Stakeholders also cautioned relying on census data, which has a delay in capturing the patterns of gentrification and displacement.
- **Consider a different definition of poverty.** Some stakeholders noted that the federal poverty rate does not communicate the extent of how poverty is experienced in NYC because of higher costs of living.
- **Analyze segregation of other protected classes over time.** Stakeholders noted it was important to lead with race, but segregation of other groups, such as people with disabilities, are important to capture.
- **Caveat that the level of social integration is not pictured.** Stakeholders wanted to note that while different groups may be living in the same district, the buildings, schools, and spaces can remain very segregated.

Defining High Opportunity Areas

Below is a summary of stakeholders' response questions on how the City should define and measure a "high opportunity area," which was discussed at the Roundtable on Segregation and Integration and the Joint Roundtable on Access to Opportunity:

- Some stakeholders expressed **concern about labeling certain neighborhoods as "high opportunity,"** which connotes value and defaults others as "low opportunity," and could further influence discriminatory investment patterns. Nevertheless, other stakeholders highlighted the **need to identify, acknowledge, and correct historic inequities in investment** between neighborhoods.
- Broadly, stakeholders commonly defined high opportunity areas as places that **promote people's health and economic opportunity, rather than impede it,** and have the **amenities and resources to enable families to climb out of poverty.**
- Beyond the presence of quality amenities and services, stakeholders emphasized these **socio-political factors as important to opportunity:**
 - **Equity in the quality of resources and services.** Stakeholders felt that neighborhoods most in need often get the most inexperienced police, teachers, and outdated technology, even though they face the most challenges.
 - **Participation and self-determination.** Empowerment of communities to contribute to improving their neighborhoods; access to effective and active public officials that inclusively engage residents.

- **Inclusion, accessibility, and freedom from discrimination.** Stakeholders said there are many low-income and public housing residents that currently live in high opportunity areas but cannot afford the goods or don't feel welcomed; homeless individuals cannot access public parks; and residents of color face racism and oppression in policing and the criminal justice system.
 - **Diversity.** While difficult to link to causality, stakeholders said that diverse, non-homogenous communities fare better. Stakeholders noted reservations about including diversity as an indicator of opportunity, but wanted to note the importance of acknowledging its role in outcomes.
 - **Social cohesion.** How people are able to converse, feel safe in their communities, and trust their neighbors can determine how one can live and move through one's neighborhood.
 - **Culturally appropriate and competent services:** Many immigrants, for example, rely on certain neighborhoods to access resources based on identity—in one's own language and with staff, instructors, and service providers who are culturally competent.
- **Specific to health and safety,** stakeholders affirmed defining opportunity as safety from sea level rise and climate change; low asthma risks; distance from waste facilities and environmental burdens such as combined sewer overflows; green space and quality recreational areas; social services access; arts and cultural institution access; healthy and affordable foods access; quality health care and facilities; healthy and safe affordable housing; low crime exposure; and social cohesion.
 - Stakeholders cautioned that self-reported measures of health can be misleading, as some cultures may say they are healthy qualitatively, but quantitatively they are below average.
 - **Specific to education,** stakeholders emphasized measuring opportunity more holistically and qualitatively: by the experience and cultural competency of teachers; afterschool programming availability; civics education; socio-emotional and socio-cultural skills taught; diverse environments; and availability of programs and practices that improve outcomes, especially for Black students.
 - Stakeholders said that current school performance metrics focus on a single test, which upholds white, middle class performance, rather than a quality education experience.
 - Stakeholders said that school quality is an important measure for families, but also noted that the number of New Yorkers who don't have children is also increasing.
 - **Specific to employment and economic opportunity,** stakeholders emphasized access to good paying, low barrier-to-entry jobs; quality job training opportunities; affordable childcare and transit options; affordable goods and services; banking accessible to low-income communities of color; broadband connectivity; quality of early education; affordable homeownership opportunities for a range of incomes; and integration in terms of wealth and education levels in the community, which is important to exposure and social capital.
 - Stakeholders wanted to see a measure of affordable goods and services as a form of opportunity, analyzed by geography, average cost, and income. Stakeholders noted that if you are experiencing poverty, you are cost burdened by everything—not just rent.
 - **Specific to transportation,** stakeholders emphasized opportunity as all neighborhoods having access to fast, efficient, predictable, accessible, connective, and a quality experience in transit. Particularly important for people with disabilities are accessible and reliable transportation infrastructure, including sidewalks. Stakeholders wanted to see measurements of the trips people take beyond work, and trips people don't take because they are too difficult.
 - Stakeholders cautioned over use of tracking transportation usage via technology, considering how different populations can be excluded due to different levels of access.
 - Stakeholders also said that robust transit access is not always necessary if all services that people need are within the neighborhood.

Summary of Recommended Goals and Strategies

This section provides a synthesis of stakeholders' feedback on the top contributing factors that stakeholders identified during the Learn Phase and their recommendations for solutions. This section is organized by the top contributing factors, which include the following* (the list below is a series of hyperlinks that will jump you to respective sections of this document):

*note that the numbers serve as identifiers and do not reflect any order of ranking

1. [The siting and type of affordable and accessible housing in NYC and the region](#)
2. [Disparities in public and private investments, services, and amenities across neighborhoods in NYC and the region](#)
3. [Community opposition to housing and infrastructure investments to accommodate growth in NYC and the region](#)
4. [Challenges to using housing vouchers in NYC and the region, particularly in high-cost areas](#)
5. [Loss of and displacement from housing that is affordable to low- and moderate-income New Yorkers](#)
6. [Discrimination and the enforcement of fair housing laws](#)
7. [Admissions and occupancy restrictions in publicly-supported housing](#)
8. [The availability, type, accessibility, and reliability of public transportation](#)
9. [Location of proficient schools and school assignment policies](#)

Each section begins with stakeholders' feedback on the draft description of the issues under each contributing factors, followed by their recommendations for solutions.

++ indicates that the idea was raised in multiple settings

Contributing Factor #1: The siting and type of affordable and accessible housing in NYC and the region

Issue 1a: Challenges with financing and developing low-income housing in high-cost areas

Stakeholders noted that creating regulated affordable housing units, especially those that are deeply affordable, is particularly challenging in higher-cost neighborhoods. Purchasing land for affordable housing in these areas is prohibitively expensive and high market rents make subsidy programs seem less valuable.

Stakeholders' suggested edits:

- Note the limited amount of publicly-owned land left in these areas.
- Add that with an aging population, siting affordable, accessible housing in high cost areas is especially challenging, and retrofits can be very expensive.
- Include that challenges in siting in these neighborhoods forces the concentration of affordable housing in low-income communities (connected to issue 1c).
- Emphasize that siting of supportive housing is particularly challenging due to costs, worsened by opposition, and is an equity issue that impacts predominately people of color and people with disabilities.
- Note that tax incentives with limited affordability requirements (like 421a) can make deeper affordability programs less competitive. The affordable rents produced in gentrifying areas are often above or at the area's average rents, but still rewards tax breaks to developers.
- Add that mixed market-rate and affordable buildings often have separate buildings, amenities, and different treatment of low-income tenants that limit opportunities for meaningful social integration.

Stakeholders' recommended solutions:

- **Require all newly constructed units, affordable and market rate, to be universally accessible and create guidelines for age-and disability-friendly design++.**
 - Design spaces to enable people to age in place, with designs that serve multiple disabilities and have no expirations.
- **Establish policy and competitive subsidies to prioritize deep affordability in high cost areas++.**
 - Promote deeper affordability levels in these neighborhoods rather than relying on the strong market to subsidize; reform the Qualified Action Plan (QAP) to change incentives for the development of tax credit housing in higher income areas where there is currently little development; tweak term sheets to allow higher developer fees and more subsidy in high opportunity areas; create a fund that developers can tap into to acquire and build affordable and supportive housing in high cost areas; revisit relative value of other tax incentives like 421a.
- **Identify public sites in high cost areas and prioritize deep and permanent affordability++.**
 - Work with non-housing agencies more creatively to find underused, viable land to prioritize deeply affordable and supportive housing.
- **Reform Inclusionary Housing policies to be able to generate deeply affordable and accessible housing, including those that can be accessed by people with extremely low and fixed incomes++.**
- **Eliminate or reform 421a to require greater return on affordable housing and ensure it does not undermine competitiveness of deeper affordable housing programs++.**

- Require a greater percentage of units to be affordable, as well as affordability levels that are deeper, and at minimum percentage below the area’s average rents. Abolish tax breaks for affordable units that are at or above the area’s market rate.
- While some stakeholders recommended eliminating 421a, some stakeholders said that 421a is still necessary to build any affordable housing in the highest cost areas, as City subsidies will never be as competitive in those markets. Alternatives would be needed to continue incentivizing affordability in strong market areas.
- **Create a mandatory affordable housing provision, which requires all residential construction in NYC to include a share of affordable housing, regardless of changes in zoning++.**
 - Incentives are expensive. Hold private developers accountable to promoting integrated living patterns, with stronger limits on what is done on private land beyond MIH, particularly beyond affordability. Some noted that there may be issues of legal authority to implement.
- **Eliminate rules in mixed market-rate and affordable developments that allow separate amenities and require developers to create a cohesive, integrated sense of place for tenants.**
 - Encourage developers to create spaces and programming that incentivize higher income households to be involved in the community and connect with low-income neighbors.
- **Offer a fast-track zoning and permitting approval option for projects, including as-of-right developments, that are achieving goals of promoting fair share in affordable housing in high opportunity areas++**
- **Expand the Department for the Aging (DFTA)’s support for Naturally Occurring Retirement Community (NORC) to bring resources to where older adults already live to age in place.**
 - DFTA’s funding for NORCs could be expanded to reach more developments and neighborhoods with many older adults.
- **Ensure sufficient funding and development of affordable and supportive housing so that there is not the dire need for shelter**

Issue 1b: Barriers to the development of new multi-family housing in high-amenity areas

Stakeholders said that lower-density zoning, historic landmark districts, and opposition to changes that might trigger density and demographic changes in neighborhoods with high-performing schools and healthy environments—particularly at the edges of the outer boroughs and in the city’s adjacent suburbs—limits realistic options for the construction of multi-family housing, especially affordable housing.

Stakeholders’ suggested edits: Add “good transit access” to the list of characteristics of high amenity neighborhoods and note that there are also parts of Manhattan with these characteristics, not just the outer boroughs.

Stakeholders’ recommended solutions:

- **Implement a city-wide approach to MIH rezoning and target high income, high opportunity areas, especially areas that are transit oriented++.**
 - Mandate an upzoning of areas that are less than ¼ mile to rapid transit. Analyze for and prioritize areas with a history of exclusionary practices.

- **Eliminate single family zoning in NYC and allow Accessory Dwelling Units (ADU), subdivisions, and other small homes strategies to expand affordable stock in historically exclusionary areas++.**
 - Transform all R1 districts into R3-2.
- **Curtail historic landmarking or create more discretion in approving landmarking applications to allow building of multifamily and affordable housing in historic districts++.**
 - Historic landmarks can make maintenance and redevelopment costly and get in the way of enabling affordability. Some stakeholders felt it should be curtailed all together, while others felt there needed to be reforms to enable affordable housing.
- **Use legal action to designate certain community districts as exclusive or discriminatory and use that designation to push for more affordable housing in those areas++.**
- **Remove 12-FAR cap to enable growth and promote economic integration.**
- **End zonings that reduce development capacity.**

Issue 1c: Deep affordability in high-poverty areas

Stakeholders said that there is a need for deeper affordable housing in high-poverty areas to match local needs. But new deeply affordable housing in high-poverty areas may further concentrate low-income New Yorkers and special needs populations in these neighborhoods, which often already have overburdened schools, services, and infrastructure (e.g., schools and hospitals with high volume of constituents living in poverty).

Stakeholders' suggested edits:

- May need to re-frame this issue as 'Concentration of Poverty' to clarify.
- Some stakeholders did not think that concentration of deep affordability was necessarily problematic, but emphasized the problem of inequities in opportunities that low-income communities have to build wealth and climb out of a state of poverty.

Stakeholders' recommended solutions:

- **Develop affordable housing paired with jobs and programming for tenants to build wealth and potentially step into higher opportunity housing++.**
 - Build in requirements for affordable housing developers to include programing and partnerships to support low income tenants' upward mobility.
- **Reinvest deeply in public housing quality and programming for residents to climb out of poverty; and create solutions for the gap in federal funding++.**
- **Tie community infrastructure investments with incoming affordable housing to support residents' overall wealth and wellbeing++.**
 - Invest the Neighborhood Development Fund (NDF) to build community infrastructure, including transportation, for major affordable housing developments in historically disinvested areas, not just rezoning areas. Promote the creation of community development infrastructure in the ground floor spaces of affordable housing (e.g., cooperative work, day cares, banks, enterprises, etc.).

- **Strategically place affordable housing near accessible transit and/or add more accessible transit options nearby that connect people to employment and services++.**
 - Ensure access to accessible transportation when developing affordable housing, particularly for people with physical, sensory, or intellectual disabilities
- **In areas with already high concentration of publicly-supported housing, assess surrounding income bands to inform decisions on financing new units in the area and avoid concentrating certain bands.**

Issue 1d: Mixed-income affordability in high-poverty areas

Stakeholders expressed concern that new affordable housing projects that include moderate- or middle-income rental units in high-poverty neighborhoods may spur gentrification and displacement.

Stakeholders' recommended solutions:

- **Recalibrate Housing New York to increase units serving the lowest-income and/or homeless households, rather than moderate and middle incomes ++.**
 - People earning over 120% of AMI are still well served by the market in NYC. Set aside 10% of the 300,000 unit target to be for homeless New Yorkers, with minimum 24,000 in new construction. Pass Intro 1211 to mandate developers who receive City funding to set aside 15% of units for homeless New Yorkers. Increase number of units available for those earning 30% of AMI and below.
- **Adjust term sheets for different types of markets; ensure affordability bands are below market and not inaccessible (too high) for the neighborhoods in which they are located++.**
 - Some stakeholders suggested matching term sheets to neighborhood AMI's, while others noted the potential fair housing implications of this, but recognized the importance of ensuring affordable units are not out of reach and contributing to gentrification.
- **In high poverty areas, substitute middle / moderate rentals with affordable homeownership / limited equity co-op opportunities++.**
 - There is high demand and limited supply for affordable homeownership; this can enable residents to build wealth and avoid increasing average neighborhood rents; enable next family to purchase home affordably too.

Contributing Factor #2: Disparities in public and private investments, services, and amenities across neighborhoods in NYC and the region

Issue 2a: Equity-based investments

Stakeholders noted a historic and, in some cases, ongoing failure to invest in housing quality, schools, environments, and physical infrastructure in neighborhoods of color, which has led to disparities in access to opportunity and overburdened social infrastructure. Simultaneously, many residents fear certain investments could increase property value and lead to displacement.

Stakeholders' suggested edits:

- Include more explicit reference to historic racism in this description.
- Emphasize there is not enough transparency and self-determination for communities on investment decisions.
- Add that on top of already inequitable historic investments, marginalized communities are burdened by increasing sewage and storm water challenges of a growing city.
- Acknowledge that the focus on 'growth' and target production numbers to measure success limits the ability to measure the actual quality and impact of initiatives on the lives of people who need the investments most (e.g., about the # of jobs and income, but not about who gets the job).

Stakeholders' recommended solutions:

- **Create a commercial rent stabilization or discounted retail rent program to prevent gentrification, and enable small businesses and non-profits that provide affordable goods and key services to operate in high cost areas++.**
 - Target high cost neighborhoods or gentrifying neighborhoods, where low income residents have a hard time affording groceries and other goods, which impacts residents' ability to afford rent. This can also fill empty storefronts, and help community facilities to support overcapacity community resources that carry the burden or supporting residents in needs.
- **Conduct comprehensive neighborhood-level community planning with a racial equity lens to align capital investments with neighborhood needs and improve access to opportunity++.**
 - Conduct needs assessment of infrastructure and services across the city, particularly for low-income communities of color, which includes school capacity analysis, open space, demographic analysis, etc., similar to 197-A plans.
 - Track City investments by CD and make public maps that include layers of income and race. Use this to make more participatory and equitable decisions on investments, and distributing burdens and benefits of the growth of the city. Stakeholders noted that what neighborhoods got out of the rezonings should have happened without the rezoning.
 - Train City agencies to do comprehensive planning and deliver services with an equity and fair housing lens. Assess whether policies and investments might have racist impacts and whether they are furthering fair housing.
 - Create an advisory group to help shape projects to better achieve justice and equity goals, and review and monitor long-term impacts.
- **Establish a policy that development on city-owned land should only be used to prevent or reverse the impacts of historical disinvestments in communities.**

- **Require private developers to do a fair housing analysis with each project++.**
 - Require developers to assess and correct potential development impacts on segregation and reinforcement of disparities in access to opportunity.
- **Explore a resolution, impact fee, or other type of public value recovery mechanism to redistribute investments and return on land value via development ++.**
 - Whenever there is a public or private action that creates increase in land value, it is disproportionately accrued by the private market rather than for the greater public. Explore and create land value capture models for New York City that redistribute money into public housing, school, and environmental improvements.
- **Make the City Planning Commission independent and separate from the Department of City Planning.**
 - Ensure the Commission is represented by individuals that are independent and neutral of bodies that may be coming to present, including the Department of City Planning.
- **Shift away from austerity and numbers to measure success (e.g., # of jobs, # of units), and focus on the quality and impact of investments to help get people out of conditions of poverty++.**
 - For example, a jobs plan that leads to a big number of jobs that low-income communities of color do not qualify for is not an equitable economic development strategy.
- **Implement a “healthy housing for all” initiative to educate on, and standardize the incorporation of, holistic health strategies in the design of housing.**
- **Intentionally and equitably invest in schools in high poverty neighborhoods to improve the quality of instruction, facilities, and supplementary programming++.**
 - Set funding aside to rehabilitate schools in low-income communities of color that may have high needs yet lower supplementary PTA funds so they are in good condition and promote a positive learning environment. Reevaluate design and features (bars on the windows, metal detectors, ceilings, and façades) so young people can be excited to attend school. Build elevators and other accessibility features for students, teachers, and parents with disabilities.
- **Prioritize equitable broadband and tech access for low-income neighborhoods to address historic disinvestment by the private sector.**
- **Promote more equitable access to public space and arts that is culturally diverse and rich.**
 - Prioritize neighborhoods with disparate access to arts and public spaces.
- **Require more transparency, oversight, and participation of NYCHA residents in decision making to help inform new development on NYCHA land.**
 - Give NYCHA residents more say and invite people to forge a good solution.
- **Incorporate universal design into all public design initiatives.**
 - All units, buildings, and infrastructure funded by the City should incorporate universal design features.

Issue 2b: Limited financial services

Stakeholders said that neighborhoods of color are served by limited financial services, which impedes personal and community wealth-building. Additionally, stakeholders expressed concern that the Community Reinvestment Act is being used to gentrify neighborhoods historically populated by people of color, while not actually benefiting existing residents in need.

Stakeholders' suggested edits:

- Add that there are often gaps in financial literacy and credit history barriers that people face to obtain financial services.
- Add that communities have a high distrust of banks, and relationships need to be repaired.
- Add that prospective homebuyers of color are less likely to have wealth to save for a down payment.

Stakeholders' recommended solutions:

- **Expand down payment assistance and forgivable loan programs for low-income people of color to achieve homeownership ++.**
 - NYC has a program but it fluctuates based on funding. At some point it was up to 130% of AMI, but funding ran out. Resources for down payment assistance programs should be expanded, and eligibility should be increased above 80% of AMI to maximize down payment assistance. Cities such as Seattle and Boston go above 80% AMI and have higher grants that go above \$40K. These cities levy tax to support down payment assistance.
- **Expand partnership with OFE and other financial institutions to help tenants improve financial literacy and build wealth and credit++.**
 - Include wealth development management courses for New Yorkers, including Housing Connect applicants, to understand savings, credit, mortgages, loans, etc.
- **Establish a Rent as a Credit Building Tool system to enable rental history payment to be used to build credit scores++.**
 - Rent reporting pilot is helping NYCHA residents in the Rockaways and LIC build credit.
- **Teach life skills in K-12 public school classrooms and afterschool programs, like financial management, civics, health and wellness, and others that impact economic opportunity in adulthood++**
- **Modernize the Community Reinvestment Act and incentivize banks to invest in low-income communities, prioritizing funding for low-income people of color++.**
 - Collect comprehensive lending data and CRA tracking; track smaller banks not subject to CRA.
- **Partner with banks to create products that reduce barriers to banking in high need areas, including financial education and credit for communities to invest in their neighborhoods++.**
 - Banking programs need to be targeted to neighborhood needs, including language, hours, and other cultural barriers. Communities need a way to build trust with banks.
- **Create a NYC Public Bank and conduct public-private partnership to create funding for Community Development Financial Institutions (CDFIs).**

- The state will no longer fund CDFIs. City should partner with organizations that fight for CDFI funding and should have a public bank that can take investments; provide opportunities to underserved communities to invest in their neighborhoods; tap money from Wall Street.
- **Expand programs that help parents save money for college for their children.**

Issue 2c: Insufficient programs and pathways to sustainable careers

Stakeholders said that some job training programs, which target communities of color that currently experience high unemployment, do not focus on the right skills and do not lead residents to meaningful, career pathways (e.g. stakeholders worried about long-term prospects for low-wage retail and security jobs). Residents also face challenges to participate in job training programs due to childcare, transportation costs, and income needs.

Stakeholders' suggested edit: Emphasize that many people face challenges in participating in training and apprenticeship programs due to gaps in required math and reading skills, and the demand for bridge programs to develop these skills is greater than the supply.

Stakeholders' recommended solutions:

- **Establish an equity approach to NYC economic development and coordinate robust programs to enhance capacities of low-income New Yorkers to have economic mobility++.**
 - Incorporate equity into mission and decision making, including RFPs, and have a third party monitor. Create strategies to coordinate increased wages, expand career pathways, job training, and job readiness programs that focus on marketable skills for living wage jobs. Expand industry partnerships to systematize engaging employers in informing training programs. Focus on improving outcomes particularly for people of color and people with disabilities.
- **Require and support developers and employers to conduct not only local hiring, but also early targeted local workforce development++.**
 - Current residents want to be prepared and trained for the jobs created through development in their neighborhood. Challenge: legal constraints of requiring local hiring.
- **Enable community preferences for new jobs for historically low-income communities++.**
 - Need to specifically target traditionally low-income people and people of color who are most disadvantaged.
- **Expand bridge programs that develop remedial math and reading skills required for many training programs, with geographic recruitment strategies that target areas in most need.**
- **Invest in stronger math and reading education in 3K-high school.**
 - Short workforce program in adulthood can't make up for lack of investment in early education throughout primary and secondary school.
- **Expand tech training programs targeting high need populations, such as justice involved individuals, to gain the basic skills for employment.**
- **Preserve and promote industrial jobs, which proponents say offer living wages, stability, and professional growth, while having low barriers to entry.**

- Restrict M-zones from residential conversions..
- **Create and fund real long-term career pathway and guidance programs.**
 - Often, there are many people who aren't ready to start job training and have deeper needs to be addressed that require bigger investment in supports. Once they leave a program and get a good job, it is just the start of their career, and they need long-term support.
- **Develop quality distance learning programs that enable people to get the education and training they need to move and improve their careers, regardless of their work schedules.**

Issue 2d: Policing and criminal justice.

Stakeholders noted that disparities in policing and the criminal justice system disproportionately affect people of color and create long-term outcomes that affect their access to quality housing, employment, health and safety, and economic opportunity.

Stakeholders' suggested edits:

- Emphasize socioeconomic instability and poor wellbeing of residents as root causes of crime.
- More clearly articulate racial bias and disparities in policing and arrests, with racism as the root.
- Emphasize that over-surveillance of communities of color, particularly in public housing and gentrifying neighborhoods can lead to disparate arrests and prosecutions, and takes away one's ability to participate in civil society and often leaves one in a cycle of institutions.
- Add that there is currently limited transparency and information available to the public to hold the criminal justice system more accountable and create more informed policy.

Stakeholders' recommended solutions:

- **Implement a racial justice, restorative justice approach to engaging with residents around issues of crime and safety; create alternatives to policing, including promoting community accountability++.**
 - Reach the most victimized and perpetrated and invest in addressing the root cause of people's socioeconomic conditions. The key to safety is a cohesive community who trust one other and can be first responders in situations of crisis. Create opportunities to build social cohesion, bring communities together, and have honest conversations about shared values, trust, and accountability.
- **Redirect funding from police forces and into community-based organizations (CBOs) to do interventions to promote stability++; train police to work with community-based organizations.**
 - CBOs are often more competent in engaging with DV survivors, LGBTQ individuals, immigrants, and other groups, who have trusted relationships with these organizations. Neighborhoods are often not cohesive and there are specific needs of certain populations that need more nuanced solutions.
- **Reduce surveillance of communities of color and break the connection between 311 calls and the NYPD++.**
 - The increase in 311 calls in gentrifying neighborhoods can contribute to increased surveillance on residents of color, and may lead to disparate arrests and prosecutions.
- **Avoid the use of data-based algorithms to deploy officers.**
 - Biases can be baked within algorithms and perpetuate the over-surveillance of areas with more low income people of color.

- **Assign mental health liaisons for each neighborhood and create alternative response systems for residents to call to for crises involving someone with a mental disability, other than the police.**
- **Train landlords to conduct tenant mediation regarding noise complaints and other minor issues rather than resorting to calling the police or pursuing eviction.**
 - Complaints about noise to landlords in mixed market-rate and affordable buildings have led to housing court cases to evict those tenants.
- **Reduce the number of unnecessary arrests, especially custodial arrests, and legalize minor offenses like marijuana to address the inequitable history of criminal justice++.**
 - Officers have the discretion to make non-custodial arrests, such as getting a ticket for riding a bike on the sidewalk or for littering, which can have disproportionate impact against New Yorkers of color and collateral consequences for undocumented New Yorkers. Stakeholders cautioned as a potential unintended consequence that if responses are perceived as too soft by the greater public, the next administration or policy might respond with even harsher enforcement.
- **Conduct frequent implicit and explicit bias training for police, and create metrics to measure impact and accountability.**
 - First half of bias training is awareness, but police also need continued training to reinforce concepts, to learn the steps to manage bias, and apply concrete tools to use instead of gut instincts. Create more avenues for community accountability to what the trainings are doing; track the impact and share back with the public.
- **Assign culturally competent officers to work with low income communities, especially public housing residents, to improve relations with communities.**
- **Shift metrics for police success and promotion to community-mindedness and cultural competence, rather than number of arrests and conviction rates.**
 - Create measures to reward positive community relations, and discourage any cultures of violence, toxic masculinity, and white supremacy.
- **Require mandatory full legal representation in NYCHA Administrative Hearings and establish more easily accessible locations for hearings.**
 - Currently, not all NYCHA residents have full representation. Additionally, decentralizing hearing space by having more in outer boroughs would present greater access for residents.
- **Discourage the District Attorney's Office from bringing cases in criminal court to Housing Court and compelling landlords to bring a case.**
 - In many cases brought by NYPD and DA in Supreme Court (such as alleged drug activity), it has been easier and better to settle a case with flexible terms. However, the DA will sometimes bring the case to Housing Court by compelling the landlord to bring a case or else sue both, alleging collusion. Once in Housing Court, it is difficult to settle, and this threatens housing instability for the individual (even after the case has been settled).
- **Expand support available for families impacted by the criminal justice system.**

- Families whose ‘breadwinners’ have been incarcerated don’t have support. Expand Children of Promise (non-profit) programming citywide. Target neighborhoods and communities with high number of reentry individuals.
- **Create robust, anti-recidivism, reentry and discharge services that include stable housing and employment++.**
 - Funding these solutions would save money in re-arrests, shelters, rehabilitation/treatment, etc.
- **Enact legislation for expungement and require court systems to go through records to automatically expunge++.**
 - As part of the Raise the Age legislation, eligibility for expungement was expanded, but still falls behind other states. Currently, to be eligible, you must have waited 10 years free of other convictions, and be limited to 1 felony and 2 overall offenses (other states are 3-5 years and sometimes less especially for non-violent crimes). For people who have served their time or have been arrested, they should not be denied housing.
- **Increase public reporting and transparency from NYPD, including the joint remedial process++.**
 - Allow access to what officers are required to report, pursuant to the State Transparency Initiatives: information on low level infractions, demographic and geographic information, and the number of people who die in police custody. The City should report Level 1 and Level 2 encounters, which are encounters where people are legally free to leave. Use this data to inform policy solutions. These will allow more community oversight and could significantly improve disciplinary measures.
- **Reform laws to hold officers accountable for misconduct, including repealing the Civil Rights Statute 50A (“police secrecy” statute) and expanding and codifying Executive Order 147 (Special Prosecutor).**
 - The Civil Rights Statute 50A shields misconduct histories of officers from public view. Executive Order 147 requires the Special Prosecutor to include the investigation and, if warranted, prosecution of certain matters involving the death of an unarmed civilian, whether in custody or not, caused by a law enforcement officer.

Issue 2e: Environmental justice

Stakeholders said that many neighborhoods of color—particularly ones that are high-poverty—are over-concentrated with waste transfer stations, bus depots, truck routes, shelters, jails, and climate vulnerability, while high-income or predominantly white communities have few or none.

Stakeholders’ recommended solutions:

- **Implement an equity / fair share model to guide decision making to relieve burden from low-income communities of color in the siting of hazardous and/or unwanted facilities++.**
 - Ensure they are placed in high income neighborhoods also and not being oversaturated in low-income neighborhoods.
- **Take down highways and restructure interstates to improve air quality for communities of color and reduce fragmentation.**
- **Adopt practices that reduce air pollutants and waste/heat pollution by reducing truck traffic and improving air quality regulation for expressways and local factories that are near low-income communities++.**

- Conduct monitoring indoor and outdoor. Need iterative process with the public and implement what people have agreed upon.
- **Implement waste reduction initiatives, not just waste relocation, from low-income communities of color.**
- **Create opportunities for residents, including building managers and owners, to be involved in environmental monitoring and improvement, whether in their own units, building, or neighborhood overall.**
 - Establish Resiliency Education Training and Innovation (RETI) centers that can train people, especially public housing residents and young people, on toxins, life skills, trainings, EPA/HUD/DEP drainage, and climate resiliency in their community.
- **Establish financial vehicles, such as tax levies, that leverage new residential development to fund resilience improvements.**
 - Leverage new development to fund sewage system upgrades to prevent flooding in the future, fix insulation, façade and building envelope, HVAC updates, etc. Need to distribute money from upstream to downstream—where the impact happens.
- **Expand income-based resiliency and energy efficiency measures for low-income homeowners.**
- **Increase quality green space and tree canopy, especially for low-income communities of color++.**
 - Ensure accessibility and openness to the public, including access for homeless people. Ensure maintenance of spaces too.
- **Expand Be a Buddy Program and other initiatives to foster community cohesion and get neighbors to check in on each other++.**
 - Promotes community resiliency in the midst of climate vulnerability.

Issue 2f: Indoor health hazards

Stakeholders said that people of color, particularly those who live in public housing, are overexposed to indoor hazards such as pests, mold, and lead paint, which can directly impact children’s learning abilities and residents’ physical and mental health.

Stakeholders’ suggested edit:

- Add reactive system of code enforcement and the limited capacity of the City to get involved in housing quality court cases as a challenge.
- Add that current home repair programs do not provide enough financing to make significant and critical home repairs in a timely manner.

Stakeholders’ recommended solutions:

- **Find ways to invest more heavily in the preservation of public housing++.**
 - Find creative ways to raise money and spend effectively at NYCHA, e.g., using transferable air rights, etc.
 - Hold NYCHA more accountable to addressing housing quality issues (311, violations from HPD, judicial penalties, or other incentives that do not necessarily add financial burden but compels improvements to indoor housing hazards).

- **Increase HPD court proceedings to increase City’s role in intervening in housing quality cases.**
- **Establish rules for remediation to address underlying conditions, and create standardized best practices from cost and effectiveness, especially for mold removal++.**
 - Identifying and addressing causes of leaks, mold, mildew, and other indoor hazards can save landlords and the City more money in the long run, and improve tenants’ housing quality. Local law 55 and 61
- **Require quality management and maintenance in affordable housing; provide trainings for property managers on relationships with tenants and responding to health issues.**
 - Example of James Weldon Johnson Houses in East Harlem where the manager gives his cell phone to tenants and it is very well managed. Need to share best practices to help train managers to build relationships and be able to identify abuse or other health-hazardous behaviors. Research shows doormen can be eyes and ears of a facility.
- **Increase funding to support compliance with Local Law 55 (2018) among low-income homeowners.**
 - This law, sometimes informally referred to as the “Asthma Free Housing Act,” compels landlords to address pest and mold issues, but does not provide funding for owners who need help do it; need carrots and sticks.
- **Create a forgivable emergency repair program for good property managers that may be struggling to repair older buildings for their tenants.**
 - Waiting for a loan from the City can take too long, and emergency repair loans often cost too much. Prioritize tenant safety and health first.
- **Expand basement legalization pilot and legalize safe basement apartments.**
 - Illegal basement dwellings pose a risk to tenants and homeowners. Legalization of safe apartments provides health and safety benefits as well as much needed income for LMI homeowners.
- **Provide affordable financing for home repairs, efficiency retrofits, resiliency investments, and accessibility modifications to enable seniors to age in place.**
 - These programs should be well-funded and easy to access for low-income, senior, and physically disabled homeowners. Financing should also be made available for flood retrofitting to increase coastal resiliency and offset flood insurance hikes. HomeFix is a great first step towards meeting this need.

Contributing Factor #3: Community opposition to housing and infrastructure investments to accommodate growth in NYC and the region

Issue 3a: Power imbalance across communities that have a voice in approving or disapproving local investments
Stakeholders expressed concern that public and discretionary review processes can amplify the voices of wealthier, White residents, who have the time, opportunity, and political power to facilitate opposition to increases in density, homeless shelters, and undesirable infrastructure necessary for the City's growth. Stakeholders noted that opposition to projects in higher income areas, often rooted in discrimination against specific groups, can lead to successful blocking of projects in these areas and consequently, the concentration of these uses in high-poverty neighborhoods and communities of color

Stakeholders' suggested edits:

- Add that much of opposition is rooted in privilege and often a sense of entitlement rooted in race and class, which is the most difficult to combat.
- Add that in many communities, Community Boards are not representative and have halted much investment in their communities.
- Add that stakeholders feel that power imbalance is about political will.

Stakeholders' recommended solutions:

- **Create a PR campaign to publicize great examples of supportive and affordable housing that has been built, their tenants, and their impact to address stigma++.**
 - Need a PSA, such as the Everyone in LA campaign, on how people become homeless in the first place that humanizes tenants. Could create a social media campaign that is youth-led and owned to conduct interviews. Include a wide variety of stakeholders, including businesses, churches, community leaders, and non-governmental groups. Currently, supportive housing developers rely on Community Preference as a carrot used to get community buy-in and push back against opposition.
- **Create a "Leadership Institute" focus group that brings in leaders, organizations, and residents in white wealthy neighborhoods to discuss how to address opposition and challenges in bringing affordable housing++.**
 - Have honest and collaborative discussion on challenges, how to get buy-in in their own communities, and solutions. Currently happening in Connecticut; includes a public education process disseminating info to combat opposition via social media (where sentiments are often shared). Be careful to not backfire and put burden on people of color to educate White people on these issues.
- **Need more investment in educating communities about the historical context around segregation.**
- **Require better representation on Community Boards of historically marginalized populations that exist within Community Districts, including NYCHA residents++.**
 - Require comprehensive diversity plans for each board. Create a stipend for these populations to participate. Impose language access requirements.
- **Reevaluate Community Board system of input to address imbalance of power and create a different system for public participation to inform new development++.**
 - Stakeholders suggested a range of ideas, from changing power based on neighborhood income, eliminating Community Boards overall, to eliminating their recommendation vote. Require more

meaningful incorporation of voices of low-income residents. Create a civic technology tool to enable citizens to more easily comment on policies and give people the opportunity to weigh in.

- **Shift power of Council Member to be advisory rather than a final decision regarding affordable housing in neighborhoods that need it.**
 - Elected officials should only be able to advise, not kill an idea, especially if it gets in the way of developing affordable housing for the neediest people.
- **Amend the charter to allow passage of a citywide zoning amendment to only require the Borough Board instead of all 59 Community Boards.**
 - This makes process to pass city-wide equity initiatives like MIH less prone to opposition and easier to create city-wide zoning codes.
- **Create ULURP bypass and/or fast track approvals for projects that promote equity and city-wide needs (e.g., transit accessibility, 100% affordable housing, supportive housing, sanitation garages, school seats, etc.) ++.**
 - Stakeholders noted a need for centralized decision-making to address stigma and opposition. Make clear to NIMBY communities that these are priority investments by the City. There should also be a greater level of education among City agencies on how length of time to obtain permitting and approvals can significantly slow down the process of building affordable housing.
- **Create a state-wide Housing Appeals Board (HAB) to override local zoning decisions that are limiting affordable housing proposals and fast track proposals that have delays due to opposition.**
- **Create a fund that can be used by developers and the community to fight opposition against affordable housing in high opportunity areas++.**
 - Allow non-profit developers to use funds to connect with community relations consultants to help to organize and bring different people together to advocate on community needs. Stakeholders also questioned the lawful use of public funds and potential perceptions of conflict of interest.
- **Mandate affordable housing to include usable, quality green space, quality design, and attractive amenities++.**
 - If affordable housing were appealing and brought additional environmental benefits, it may be more appealing to communities and overcome opposition justified on aesthetics.

Issue 3b: Fear of investments in high-poverty neighborhoods, leading to local opposition of individual projects

Stakeholders said that high-poverty communities perceive development and revitalization, including affordable housing and improvements to neighborhood amenities, as potential triggers of gentrification and eventual displacement. As a result, current residents may oppose a development project as serving new residents, but not existing residents.

Stakeholders' suggested edit:

- Add that the root cause of this opposition is that the benefits of new development are often not accessible and historically has contributed to displacement.
- Add that residents place a lot of pressure on single development negotiations because people feel current systems in the neighborhood are not working, making it an outlet for people to try to solve all other neighborhood problems.

Stakeholders' recommended solutions:

- **End upzonings in low-income communities of color; instead target high income neighborhoods for MIH, while working with mission-driven groups in low income areas++.**
- **Enable means for communities and their elected representatives to conduct community-based planning to bring major capital resources to their neighborhoods++.**
 - Stakeholders noted that CMs operate in a context of historic disinvestments in some areas and have no choice but to approve rezonings and the investments they promise to come with. Many elected officials want to do the right thing, and with very few tools the City provides to re-invest in neighborhoods, some must rely on rezonings to bring investments. If there were a fair share and equity approach to investments, communities that have historically been disinvested would get the investments they have long needed.
- **Conduct transparent and accountable community-based planning from the beginning stages that engage those that might be most impacted.**
 - Lack of transparency and clarity makes it difficult to allow people to advocate for their own neighborhoods. City outreach has been limited and the burden is often placed on CBO's to make sure folks come to meetings, without resources from the City.
- **Require new development in low-income communities of color to incorporate expansive community benefits and build a sense of ownership for surrounding residents ++.**
 - Ensure that public spaces and retail are accessible and free of discrimination. Ensure that new development contributes to promoting health, affordability, and job opportunities of surrounding residents. Establish a framework and standard process so groups can more meaningfully contribute to shaping CBAs before final decisions are made. Require community-based, non-profit partnerships. Expand Community Benefits Agreements and establish a framework and standard process so groups can more meaningfully contribute before final decisions are made.
- **Make information about projects in public process more clear, transparent, and accessible for lay people to understand++.**
 - Zoning text can be very technical and takes years of experience to understand. Opposition on projects often occurs because people have the wrong information. Hire culturally competent City staff who can better communicate with residents.
- **Conduct city-wide displacement analysis and address before incentivizing new development++.**
 - There are a lot of issues leading to displacement, and communities would feel more trust if these were articulated and studied (rather than denied that they are happening).
- **Reform CEQR, including analysis of displacement, school seats capacity, fair housing impact, and requirements and enforcement of mitigations to address current and future needs++.**
 - Capture benefits from new development as a form of reparations for historically impacted communities. Reform the impact analysis on school seats to look at actual zones and charter schools. Require and enforce CEQR mitigation. Projects should only be allowed to proceed if existing needs and risks are measured and met and displacement risks are absent.
 - Challenges to address: oversight; enforcement of mitigation to the scale of the problem; not discouraging private investments in areas with lots of need.

- **Create a right to return provision for people who have been displaced to be able to return to their communities in new affordable housing, including funding to support relocation.**

Issue 3c: Perceived piecemeal development leading to local opposition of individual projects

Stakeholders said that perceived piecemeal development allows organized communities to argue that specific projects are out of context, without considering the city's overall needs. Stakeholders also noted that there are some existing city-wide plans, but communities lack information or have misinformation about them.

Stakeholders' recommended solutions

- **Conduct comprehensive, localized fair housing analysis and mandate fair share growth targets in deeply affordable and supportive housing for each community and district++.**
 - Conduct either by CB or general areas (e.g., North Brooklyn, Central Queens) to more deeply analyze changes in living patterns; displacement risks; levels of community opposition. Give some discretion on how to achieve those goals to allow community voice. Prioritize production in areas with lower than fair share amount. Make it impossible for communities to reject an affordable project if a community does not have its fair share of deeply affordable housing. Emphasize bringing opportunity for protected classes where they are not currently concentrated. Have a neutral third party conduct the assessment.
- **Combine the City's housing and homelessness policies.**
 - It is unfair that in NIMBYism shelters are considered "unwanted uses" in the same category as waste facilities, which can reinforce the stigmatism around homeless families. The separation from shelters to affordable housing can continue to reinforce a stigma against homeless families.

Contributing Factor #4: Challenges to using housing vouchers in NYC and the region, particularly in high-cost areas

Issue 4a: Rental allowance limits

Stakeholders said that housing vouchers do not provide sufficient rental assistance to provide tenants with realistic options to live in integrated, high-amenity neighborhoods.

Stakeholders' suggested edits:

- In addition to Section 8 vouchers, City vouchers (CITYFHEPS) and state voucher FHEPs are not competitive in the New York City market, leaving recipients in competition for units in an extremely limited pool of housing in a few far neighborhoods, reinforcing economic and often racial segregation.
- Note the fact that increases in voucher amounts are tied to Rent Guidelines Board votes, which can pit the interest of rent stabilized tenants facing steep increases against the interests of homeless families with vouchers looking for housing.

Stakeholders' recommended solutions:

- **Increase allowance limits to meet fair market rents in NYC, particularly in high cost areas++.**
 - Raise limits to meet actual FMRs. Potentially establish Small Areas FMR with current FMR as the floor, to prevent reduced payments in lower-rent areas that could force tenants to pay more; landlords should receive no less than FMR but should get more in higher rent neighborhoods to increase access to those areas. Increases in voucher amounts should not be tied to Rent Guidelines Board vote, but rather to the FMR.
- **Give lottery preference, especially higher income units that may still be vacant, to residents with a voucher++.**
 - Need data on how many voucher holders are getting housing lottery units.
- **Allow voucher holders to merge voucher benefits together and live in shared spaces (rooming).**
 - Shared spaces are better than shelter as an option for some individuals and families
- **Relocate willing families or individuals outside of the five boroughs in the region, where housing is more affordable and homeownership more possible; create jobs and incentives in those areas.**
 - Still need to address NIMBY issues and SOI discrimination in the region.
- **Increase rental allowance limits on NYCHA RAD Conversations.**
 - Concerns that not all tenants living in portfolios that will undergo RAD will be in the threshold of the current allowance. More transparency needed, so tenants can start planning ahead.
- **Create a City-funded Section 8 program at scale.**

Issue 4b: Barriers to landlords accepting vouchers

Despite New York City's ban on source of income discrimination, stakeholders said that landlords frequently reject tenants with housing vouchers for reasons including burdensome administrative requirements, communication barriers, and outright discrimination.

Stakeholders' suggested edits:

- Add payment structure and delayed payment challenges, as well as limited support for landlords to get units to pass inspection requirements.
- Add that landlords have been maintaining apartments to such low standards that the voucher program stops paying and the landlord can successfully 'evict' the tenant through non-payment.

Stakeholders recommended:

- **Simplify landlord compliance and make voucher payments on time; consider up-front payments to create an incentive to take vouchers, or a fund that helps ensure payments++.**
 - A stakeholder suggested creating a fund that helps ensure payment to landlords if there are problems with a voucher holder. Another stakeholder argued that this might give into the false narrative that voucher holder tenants as problematic compared to 'normal tenants.'
- **Streamline and standardize the different types of vouchers and create a clear contact list to troubleshoot voucher issues for landlords++.**
 - Los Angeles, for example, has an overall flexible housing subsidy pool. A non-profit broker exists and there is a risk mitigation fund.
- **Work with non-profits to act as brokers to help find housing.**
 - However, another stakeholder cautioned that this may concentrate voucher holders in specific places with specific landlords, and staff need to be trained well.
- **Create incentives and communicate benefits for landlords to accept vouchers++.**
 - Stakeholders suggested loan forgiveness programs or a Next Available Unit credit that landlords can opt into. As a unit becomes vacant, if a landlord gives it to a voucher holder, they can get some type of credit.
- **Run a targeted city-wide education campaign to educate tenants and landlords on source of income discrimination and rights and responsibilities++.**
- **Create a program for small mixed-use buildings (e.g., commercial in ground floor with vacant upper floors) to renovate and rent their unit to Section 8 or other City voucher holders.**
- **Change inspection, enforcement, and court protocols to hold landlords accountable for evicting voucher holders++.**
 - Landlords evict voucher holders by failing a Section 8 inspection, which triggers the end of a Section 8 payment and enables the landlord to take them to Housing Court. Have HPD and NYCHA make the repairs directly and bill to the landlord. Further educate judges on these issues so voucher holders are not kicked out through the court system. If landlord has multiple buildings, they should be required to house a tenant in another unit (even if temporary for when repairs are made).
- **Evaluate housing rehabilitation programs and create other support to help landlords with funding repairs if they cannot hold their buildings up to standards for tenants.**
- **Expand section 8 voucher access for everyone, from homeless to middle income++.**
 - Bigger constituency could mean it is more widely accepted by landlords if they were more common.

Issue 4c: Support and counseling on neighborhood choice

Stakeholders said that some staff at relevant agencies exclusively direct voucher holders to the same neighborhoods—which are predominantly communities of color—where they know landlords are more likely to accept vouchers. Stakeholders also said that families with children do not receive adequate counseling around decision-making on how to use vouchers to direct their children to high-performing schools, both across New York City and in suburban areas. Stakeholders also noted social challenges faced by households that move into predominantly White, high-cost areas, in addition to differences in policing, isolation from supportive networks and service providers, and an inability to afford groceries and other goods.

Stakeholders' suggested edits: Add that stakeholders reported various agencies giving conflicting and/or misinformation to clients.

Stakeholders' recommended solutions:

- **Streamline information and properly train and support staff that serve as information points on vouchers to ensure clear and accurate information sharing++.**
 - Include more support in choosing high opportunity neighborhoods and finding apartments. Train Family Welcome Centers and shelter staff to provide proper info to families about choice when it comes to schools.
- **Partner with CBOs, faith communities, and schools to provide counseling services for families looking for housing with a voucher.**

Issue 4d: Language access barriers

Stakeholders identified barriers to receiving and using vouchers for certain racial and ethnic groups, including limited outreach, education, and support available for tenants and landlords with limited English proficiency.

Stakeholders suggested:

- Add citizenship status barriers—there is a lack of clarity on eligibility related to citizenship, and community-based organizations serving these populations often don't know how to respond.
- Add that better sign-language interpretation is also needed.

Stakeholders' recommended solutions:

- **Clarify the voucher eligibility and application process for immigrants and mixed- status families, and train and support community-based organizations that serve immigrants on these processes++.**
- **Improve multilingual outreach for owners who speak English as a second language to accept vouchers.**

Contributing Factor #5: Loss of and displacement from housing that is affordable to low- and moderate-income New Yorkers

Issue 5a: Tenant Protections

Stakeholders said that historical changes to the rent stabilization laws have led to an increase in harassment, evictions, and deregulation, which contribute to the loss of neighborhood diversity. Stakeholders noted that families who have been forced to move have fewer housing choices and often end up living in lower quality housing, overcrowded units, and/or more segregated neighborhoods.

Stakeholders' suggested edits:

- Add the issue of homeowner displacement, particularly homeowners of color, through foreclosure and scams that lead to loss of affordable housing for both the owner and their tenants.
- Make more explicit issues with housing court, including the duration of cases that might lead to losing an apartment and the lack of appropriate sign language interpreters.
- Add persistent unfair buy-outs for both tenants and homeowners, which lead to rapid turnover and loss of affordable housing.

Stakeholders recommended solutions:

- **Reform rent stabilization laws and improve state resources for oversight and enforcement++.**
 - Eliminate landlords' ability to use Individual Apartment Improvements (IAI), Major Capital Improvements (MCIs), preferential rents, and other tactics that harass tenants, raise rent, and destabilize units.
 - Increase HCR's resources to be able to review construction allowed under MCIs and investigate landlord claims. Have MCI increases be time limited, as landlords recoup costs in 3-4 years but rent increase lasts forever. Extend comment period available for tenants during MCIs.
 - Allow addition of people on a lease for rent stabilized units, particularly important for people with disabilities with caretakers.
 - Create a strong fee for the destabilization of an apartment.
 - Establish fair rent increases, tying them to an entity that oversees rents
- **Create a system for rent checks to be deposited and automatically show that payment was made, to prevent landlords from claiming false non-payment.**
- **Create a rent stabilization program for 1-5-unit buildings, which make up a lot of housing in certain boroughs with low-income tenants that are currently not protected++.**
- **Give HPD, DOB, HCR, and other enforcement agencies what they need in order to conduct more robust, proactive, targeted enforcement of existing codes, laws, and regulatory agreements++.**
 - Conduct proactive audits, spot checks, follow through, investigations, etc. Transfer monitoring and enforcement powers of rent stabilized building from HCR to NYC.
- **Strengthen punishment for landlord harassment, including increasing penalties for harassment against vouchers holders, and increasing repercussions with multiple violations++.**
- **Expand funding for tenant outreach and organizing, and ensure accessible and multilingual documents with plain language and quality translation++.**

- **Create a centralized source of information and hotline for housing rights and resources, and improve training of agency staff and 311 operators++.**
 - Rewrite Housing ABC's. Train 311 to have better competency to redirect tenants to specialist hotlines. Reform DOB responses to complaints on harassment.
- **Enact Fair Exchange legislation for buy-outs and create a tenant education program around their rights and negotiation++.**
- **Expand Universal Access to Counsel to enable affirmative litigation and address issues prior to eviction++.**
 - Some stakeholders felt that Universal Access to Counsel is steering funding towards responding to court cases, and away from preventative and affirmative work. Create partnerships with paralegals and advocates to support other tenant legal services outside of eviction prevention.
- **Establish a holistic model of tenant legal services and integrate with other offices addressing holistic needs like social services, children's services, criminal defense, schools, etc.**
- **Reform Housing Court process to better support tenants, including mandating apartments be put on hold and rents frozen until disputes are resolved++.**
 - It has been used more by landlords to evict tenants rather than help tenants. Need more follow up and accessible avenues for tenants to report and get support from retaliation from landlords. Expand provision of housing court attorneys to be city-wide rather than limited to certain zip-codes. Improve Housing Court cultural competency and language support services, including sign language.
- **Expand Certification of No Harassment (CONH) to be a city-wide permanent program++.**
- **Create an emergency anti-displacement plan to keep people in their neighborhoods right at the point of potential displacement ++.**
 - The City should find emergency housing in the community so that people can stay housed in their neighborhood. Someone displaced from Bushwick should not have to go to the Bronx for shelter. Once someone is displaced from their neighborhood, it is challenging to return.
- **Expand existing preservation programs and support for non-profits to maintain buildings.**
- **Create a new income-based tax to raise funds to support housing emergencies, reasonable accommodations, and rental subsidies for those with chronic illnesses, etc.**

Homeowner Protections

- **Implement a City-wide Cease and Desist Zone and create a campaign educating owners on buy-outs and their rights++.**
 - Secretary of State has made it really difficult to pursue this, but we can do this in NYC to prevent the impact of buy-out harassment for both tenants and homeowners. There could be a software app or tool that people could use to properly calculate a reasonable buyout and build in other factors.
- **Continue to support free foreclosure prevention programs and legal services for homeowners++.**
 - State funded services are about to be lost for foreclosure prevention.

- **Enable income-based payment plans for homeowners with water, sewer, and property tax arrears.**
 - Provide income-based payment plans and ensure that the property tax system is designed to discourage displacement.
- **Promote education and resources for seniors and their families to do estate planning.**
 - Improve information and support for families to properly manage homes after owners pass away.
- **Create legislation that would enable people to get their property back in cases of deed fraud, deed theft, zombie homes, and properties in probate, in neighborhoods with high rates of foreclosure.**
- **Reform Tax Lien Sale Class 1 to maintain affordability and connect with Community Land Trusts or non-profits to purchase.**

Issue 5b: Affordability Duration

Stakeholders expressed concern that time-limited regulatory agreements between the City and developers can lead regulated affordable housing to become unaffordable at the end of a contractual period. They also noted that buildings will likely lose affordability in the neighborhoods that are gentrifying or have strong markets, where affordability is needed to prevent displacement, and new affordable housing is much less economically viable.

Stakeholders' recommended solutions:

- **Expand more grass roots, community-driven and community-owned models of development and investments for permanent affordability++.**
 - Support CBO's to acquire funding for community spaces. Expand Community Land Trusts. This would maximize public dollars in the long run and establish displacement protections.
- **Eliminate time-limited affordability agreements and change term sheets to require permanent affordability.**
- **Implement a Right of First Refusal in all affordable developments before resale.**
 - LIHTC has a provision that allows for the right of first refusal. In some parts of the country, the right of first refusal is for tenants, enabling a rent to own format.
- **Require developers to create a tenant plan for when regulatory agreements expire without extension.**
- **Expand preservation tax credits to encourage building owners in high markets to keep units affordable when they are about to expire.**

Issue 5c: High-demand housing market

Stakeholders said that a strong local and regional economy, which attracts more residents, tourists, and investments to NYC, has increased the demand for housing and has driven up the cost of living for renters.

Stakeholders' suggested edits:

- **Emphasize that market changes don't happen in a vacuum, and that the City of New York plays a role in shaping the market through zoning changes, incentives for businesses, and other incentives that can creating displacement effects for low-income communities of color.**

Stakeholders recommended:

- **Create a requirement for 1:1 replacement in loss of rent stabilized and other naturally occurring affordable housing++.**
 - At minimum, there should be enforcement of mitigation of loss units identified via CEQR.
- **Improve coordination between City and region to incentivize people who are interested to move upstate for jobs, etc.**
 - Parts of NYS face challenges with housing vacancy because there is not enough demand and have affordable housing, including homeownership opportunities, for low income families.
- **Reform regulations of AirBnB and other home share programs.**
 - Some stakeholders felt a ban on AirBnB is necessary because we have a housing crisis. But others noted that a ban doesn't work because enforcement is limited. Others noted AirBnB is helpful for families who have a spare bedroom and may need help paying their rent or mortgage. Others wanted to see a licensing system, as other cities have done, which would allow the City to better collect information and enforce owners. Create exceptions for home share rules that enable tenants who rely on home shares like AirBnB to rent extra rooms to help pay their rent. Some landlords are monitoring home share websites and using it to kick tenants out.
- **Implement housing vacancy tax to disincentivize harboring of vacant units in the market++.**
- **Implement a good neighbor tax credit or tax abatement for unregulated housing to preserve affordability for low-income tenants++.**
 - Landlords would receive tax abatements or exemptions if they keep rent at a certain level and/or if they rent to low-income tenants, esp. seniors, with a cap on rent increase (rent stabilization light).
- **Implement a pied-a-terre tax and use revenue to support new construction of affordable homeownership++.**
- **Support anti-speculation / flip tax++.**
 - Speculation creates rapid appreciation of properties and increases the prices of homes in neighborhoods that were previously affordable. A New York City flip tax that would deter property speculation and flipping by creating an additional 15 percent tax on properties sold and resold within one year, and a 10 percent tax on properties sold and resold between one and two years.
- **Support property tax reforms to be more aligned with fair market housing value rather than income-generation.**
 - Class 1 properties need a cap. When income-generating buildings are taxed at a high rate, it translates to the tenant.

Contributing Factor #6: Discrimination and the enforcement of fair housing laws

Issue 6a: Persistent discrimination

Stakeholders said that private discrimination in the housing industry in New York City can reinforce segregation, but it is challenging to capture. There are persistent forms of discrimination by brokers, realtors, lenders, co-op boards, and landlords rooted in stigmas against different groups or unwillingness to make accessibility accommodations. For example, protected class members are led to non-existent phone numbers or waiting lists, shown housing options of different quality or location, or provided higher loan rates. Stakeholders also noted that many victims are unlikely to file a report due to distrust of government and skepticism about the efficacy of a complaint.

Stakeholders' suggested edits:

- Add that victims most often do not know they are being discriminated against.
- Add that staff helping homeless New Yorkers looking for housing often lack basic understanding of housing discrimination, especially source of income, and knowledge of how to report it.

Stakeholders' recommended solutions:

- **Increase resources and promote coordination between CCHR and HRA's Source of Income (SOI) units to conduct more proactive tests and process claims faster++.**
 - Currently, both units are under capacity with hundreds of daily complaints, and claims can sometimes take a year, while an apartment can be off the market in a week. Increase publicity of HRA's new SOI unit and share contact information. Create an internal and automatic referral process so units can better coordinate with each other when capacity may be limited.
- **Create mandatory source of income discrimination training and reporting tool for DSS-contracted housing specialists and case managers.**
 - Reporting should go directly to CCHR and HRA's SOI units. This can help reduce burden of New Yorkers in instability to report discrimination and improve efficiencies in identifying cases and collecting preliminary evidence.
- **Expand CCHR's outreach and training of local organizations to provide awareness about fair housing rights and services; establish neighborhood-based fair housing centers++.**
 - Help tenants understand what actions might be discrimination, who to call to complain, the process to file a complaint, documents needed, etc.
- **Reform the co-op board approval process to require disclosures and fair housing training; create a standardized application with clear criteria++.**
 - Alternatively, require the registration of decision-making criteria for co-ops, who currently do not need to justify why they have chosen or rejected someone. Vancouver BC is implementing similar laws to track who buys condos.
- **Create and centralize educational materials on housing rights, processes, and responsibilities for people with disabilities, including a hotline for support and questions++.**
 - Currently, there is not a web page on housing resources for people with disabilities. Provide greater clarity on what is a violation of the law, what accommodations are appropriate, what are proper and legal ways to respond to tenants with disabilities, and how to make exceptions and accommodations for people with disabilities.

- **Implement mandatory trainings for developers and architects on making their buildings accessible; conduct vigorous inspection and review to ensure compliance.**
 - Developers disregard accessibility requirements, especially in assisted living facilities, where there is a policy of not accepting wheelchair users.
- **Establish trainings for landlords and leasing agents on fair housing responsibilities, including mediation tactics, and grade landlords based on fair housing competency++.**
 - Many small landlords are exempt from Federal-level discrimination regulations that impact tenants. Homeowner-landlords would benefit from learning about fair housing laws, their responsibilities as landlords, ways to mediate issues with tenants, trainings that cover maintaining tenants, collecting rents, budgeting for repairs, and building code compliance.
 - Create a consumer label such as a restaurant grade to grade landlords' fair housing competency. Data collection is a part of this.
- **Require landlords to support relocation of tenants with disabilities if they do not have options for modification or other units within their properties.**
 - Conduct trainings and create support for landlords to help PWD.
- **Task the NYS Division of Licensing Services to conduct license investigations without having the State Human Rights Commission involved, and hold real estate brokers accountable to fair housing compliance.**
 - Currently, the Division of Licensing Services cannot investigate discrimination by brokers unless 1) you have a court order or 2) the case has been investigated by the State Human Rights Commission. This policy should be changed so that if the Division of Licensing Services or a testing and enforcement agency receives a discrimination complaint against a licensee, they should have to investigate it.
- **Require landlords to publish minimum eligibility requirements and standard rents, and also give written reason to why tenants were denied to view or rent an apartment.**
 - Additionally, require all real estate brokers to include in tenants' documents their rights and examples of discrimination.
- **Increase fines for discrimination cases and track landlords with discrimination histories, particularly against voucher holders++.**
 - Make it very expensive for landlords to discriminate. Create a stronger fine system so it is not something the tenant has to go to court over (like EBC violations), as tenants do not have the time or resources for this, especially if they are currently seeking housing. Track landlords who are discriminating against tenants with vouchers and penalize discrimination.
- **Increase CCHR's capacity to conduct testing and enforcement of fair housing, including testing lending discrimination with banks, room shares and other online listings, and more ++.**
 - Establish a more inter-agency coordinated effort on the City level to carry out fair housing programming and enforcement.
- **Provide funding for non-profits conducting testing and outreach on fair housing and fair lending ++.**
 - Currently, there is no funding allocated by the City and State for fair housing work.

- Increase transparency of the affordable housing lotteries and publish demographic and geographic origin data on recipients, who is denied, and why++.
- Conduct testing and collect more data on LGBTQ population and their experiences with housing discrimination.
- Advocate for New York State to enact an AFFH Rule for municipalities that mirrors HUD’s requirements.
- Create better system of oversight over the leasing of privately owned units to better protect tenants from discrimination.
 - Stakeholder suggested creating a centralized office or system for private rental market selection process for tenants and landlords.

Issue 6b: Gaps in fair housing protections

Stakeholders noted the lack of fair housing protections from discrimination based on justice-involved history, low or lack of credit history, source of income (at the state level), and other characteristics that produce disparate racial outcomes and perpetuate disproportionate housing needs for people of color.

Stakeholders’ suggested edit:

- Note that landlords target prospective tenants whose names sound African American or Latino for background checks.
- Add that credit history can be especially challenging for immigrants, DV survivors, people with disabilities, and other groups.
- Add that history of Housing Court, regardless of if it were tenant-initiated, is being used to discriminate against tenants. Tenants’ awareness of this list also disincentivizes them from reporting harassment, discrimination, and taking legal action against a bad landlord.

Stakeholders’ recommended solutions:

- **Recognize justice-involvement as a protected class in the City and State Human Rights Laws and U.S. Fair Housing Act, and enact NYC legislation to limit landlord use of background checks++.**
 - Eliminate background checks as part of rental applicant screening for private landlords and create a public education campaign about the fact that there is no research to support a correlation between arrests, conviction, and being a good tenant. Arrest may not have even led to conviction, but still impact people’s ability to get housing. Conduct proactive outreach and education to landlords that there is no correlation between types of crimes and bad tenancy
- **Address the “tenant blacklist” and outlaw its use in the background check and lease up process++.**
- **Advocate for a stronger source of income law on the City and State Level; eliminate exemptions++.**
 - Landlords of 1-5 unit buildings can deny a tenant with a voucher. Additionally, there are no source of income protections at the State level.
- **Create protections for people with low credit score or no credit history in private housing++.**
 - Require an appeal process for getting rejected for a unit in the private market, like HPD.
- **Reform the Sex Offender Registration Act (SORA) restrictions to reconsider level of offense, clarify interpretation of restrictions, and make exceptions for New York City.**

- The sex offender registry system is not-evidence based and does not help people but rather isolates people and increases the chances of recidivism by blocking people from accessing their support networks. Parole districts interpret the law differently (e.g. what the 1,000 feet restriction from certain places mean).
- **Reform Human Rights Law to mandate landlords to offer renewal to tenants with disabilities in non-regulated apartments.**
- **Reform NYS disability rights laws to be at least as strong as NYC and invest in enforcement**
 - Sometimes when CCHR does not have capacity, providers will send constituents to the state, but they can only protect so far as the state law.
- **Advocate for CCHR to become substantially equivalent to federal law, which could enable more funding and efficiencies in enforcement.**
 - CCHR has been more effective than the State agency. The State Law limits remedy because they do not hold bad actors accountable. NYC and NYS Human Rights Law could be more expansive and vigorous in terms of its enforcement abilities. HUD can work with any State or local community to help them be substantially equivalent.

Contributing Factor #7: Admissions and occupancy restrictions in publicly-supported housing

Issue 7a: Availability of affordable, integrated living options for populations with special needs

Stakeholders reported that there is a lack of affordable, integrated, and fully accessible housing in a range of unit sizes for people with disabilities and/or those who need supportive services. Stakeholders also discussed limited set-asides for people with disabilities and that modified units often end up being filled by tenants who do not need the modifications. They also described that modified units are sometimes not truly accessible (e.g., challenges with wheelchair turning radius). Finally, stakeholders said that units for people with disabilities and seniors are usually studios or 1-BRs, which, combined with rules around relations between tenants, can prevent living with family or caretakers.

Stakeholders' suggested edits:

- Add the challenge that the universe of accessible units is not known, and some units may not be inhabited by someone who most needs the features. Some marketing agents choose the applicant 'least' disabled (e.g., preference for cane versus wheelchair).
- Emphasize the challenges for people with disabilities to transition out of institutional, segregated settings.
- Note that disability set-asides in affordable housing are often not met because the income threshold is too high. At the same time, set asides are not enough for the number of people with disabilities in need of housing in integrated settings.
- Include challenges around modifying existing housing to be accessible to accommodate an aging population, and the discretionary interpretation of reasonable accommodation laws.
- Add language about challenges of transgender folks, and other identities without supportive housing needs.

Stakeholders' recommended solutions:

- **Assess accessible unit demand and supply and create more robust centralized tracking of available units city-wide++.**
 - Need to understand the universe of accessible units (quantity, types, etc.) across different housing types (private and public). Begin to track what's in the pipeline, how many people need these units, how many are inappropriately housed currently, and where they are. Change the 7% mandate and HNY targets to meet the demand found by the analysis.
- **Monitor housing set-asides to ensure they are being rented to people with disabilities as intended++.**
 - Need audit and enforcement to ensure people who need the units are getting them, even at re-rental, and ensure developers are complying with 5% and 2% requirements.
- **Increase set-aside or create new term sheet with higher set-aside for people with disabilities (without homeless or NYNY status), giving preference to those transitioning out of nursing homes++.**
 - Nursing homes are more expensive than shelter or housing and would be a big cost savings.
- **Create flexibility in income thresholds for the housing lottery for people with disabilities.**
 - Supply of accessible apartments is so limited, but people get denied because they are \$100 over the limit—can they pay extra or add it to their rent, rather than renting it to someone without the accessibility needs (via an MOPD waiver).

- **Create subsidies or set-asides for individuals with mental health disorders that do not need supportive housing.**
 - There is a spectrum of mental health disorders, and some individuals turn down supportive housing options because it is too restrictive. Some people are living with chronic issues with only acute episodes (e.g., bipolarity), but do not need to be monitored for medication and are stable and employable, but still need help financially to live on their own.
- **Develop supportive housing and set-asides for people with cognitive disabilities, who are also aging and in need of housing.**
- **Change admissions criteria for supportive housing to help residents aging in place have a live-in caregiver.**
- **Increase number of NED (non-elderly disabled) Section 8 vouchers and expand rental assistance options for the disability community to live independently++.**
 - Currently only 100 at HPD and 1000 at NYCHA. Need more to increase the housing options for young people with disabilities. DRIE is limited to only if you live in a rent stabilized building. Perhaps partial funding through Medicaid since the City pays into it.
- **Expand set-asides and supportive housing for transgender individuals, youth aging out of foster care, grandparents raising grandchildren, veterans, and other special populations++.**
- **Allow DV shelters the same access to homeless set-asides and vouchers as DHS shelters.**
- **Create a new Domestic Voucher program to replace LINC III.**
- **Address housing accommodations for caregivers in public housing++.**
 - NYCHA requires care-givers to be on the lease, but lose succession rights if they are there for fewer than 12 months. This unfairly discriminates against people who may have given up their housing to care for an ailing family member. Additionally, create overcrowding exemptions for live-in caretakers, as there are few opportunities for people to move into a larger space.
- **Enable responsiveness to changing family sizes in NYCHA and other types of affordable housing that may need conversions.**
- **Change admissions requirements for senior housing to enable care-givers or partners to move in, even if they are not 62 years of age.**
- **Expand HomeFix program to include financing accessibility modifications ++.**
 - It is challenging to find financing for more than \$10,000 to modify units, making it hard to age in place.
- **Conduct a comprehensive city-wide study of people who are aging in place.**
- **Require that shelters be ADA compliant, including refrigerators for medications.**

Issue 7b: Eligibility criteria that can limit economic mobility

Stakeholders noted that eligibility criteria of housing programs can limit economic mobility for populations that rely on public support for housing – including but not limited to people with disabilities, voucher holders, and NYCHA residents. Stakeholders said that these populations often have to make difficult tradeoffs between keeping their housing support and accessing economic opportunity (e.g., a new job or higher income). Stakeholders also noted that sometimes this is driven by misinformation about what happens to rents/payments after a change in income.

Stakeholders' suggested edits:

- Include how all City vouchers have a cliff because they are tied to public assistance, which forces you to suddenly lose all your support once you become over income.
- Add that Social Security Disability (SSDI)'s income eligibility is low and has no gradual deductions, unlike Supplemental Security Income (SSI), which becomes a disincentive to work or gain any additional income or else lose all your benefits.
- Add that the confusing method of recording income levels often ends up mismarking applicants' eligibility and status.
- Add that how affordable housing is defined (one third of income) can leave lowest income families with very little disposable income to pay for basic goods and services that have high costs in NYC, which can create barriers to overcoming poverty and continued concentration of poverty. It is particularly challenging for people with disabilities because of additional costs related to medical and transportation expenses.

Stakeholders' recommended solutions:

- **Advocate with the federal government to change the definition of affordable housing (30% of income rent calculation) to be a progressive model that helps lowest income New Yorkers climb out of poverty ++.**
 - Have low income earners pay less than one third of income, or calculate by net income after additional expenses such as medical, childcare, and transportation expenses, to enable more disposable income.
- **Advocate for federal government to reform Section 8 and SSDI income thresholds and payment calculations to have gradual deductions and use net income++.**
 - Use net income after housing costs to calculate payment. If this were applied for voucher calculations, people with disabilities could go to work and earn enough to get into the SSI range or the \$25k range and be eligible for Housing Connect units.
- **Reform City voucher and rental assistance programs to be more incentive-based to support people advancing economically++.**
 - Could be temporary to cover while someone is in school and getting a job, with a gradual step-down. DRIE income limit (\$50K) should not be the same as SCRIE, as people are often younger and can/want to work.
- **Expand NYCHA Earn Income Disallowance (EID) and revisit NYCHA's rent increase policies to support working residents to be able to build wealth++.**
 - Also need to consider income to expense ratio.
- **Revisit NYCHA rent increase policies to enable even more gradual incentives, and conduct clear education and communication on how rent increases happen++.**

- NYCHA's current rent increases with income are gradual, but this is not widely known by residents. Some felt that there could be even more gradual incentives and wealth-building opportunities.
- **Enforce and expand NYCHA's deduction of medical expenses for people with disabilities.**
 - Currently, NYCHA has a \$400 stipend for people with disabilities annually, but this is not enough. NYCHA is also supposed to deduct medical expenses for people with disabilities (up to \$2,000) before calculating rent.
- **Revisit NYCHA tenant screening and orientation to ensure that new tenants who may have special needs are connected to supportive services.**
 - Some residents felt that the burden of caring for new tenants with disabilities is placed on other residents in the building, who already face compounding challenges.

Issue 7c: Administrative barriers

Stakeholders said that burdensome administrative requirements create barriers for members of protected classes to accessing affordable housing. For example, requirements for notarized copies or other actions that require multiple trips and appointments can be challenging for people with disabilities, the elderly, or people with inflexible work schedules. Legal forms of ID can be challenging for institutionalized populations.

Stakeholders' suggested edits:

- Add a lack of language accessibility and clarity on eligibility for immigrants for public assistance programs.
- Include the incongruence between City/State/Federal laws and even between City programs and agencies, which create confusion for both applicants and caseworkers meant to help people navigate the systems. Paperwork for multiple benefits can also be complicated. If a building, for example, has multiple subsidy sources, tenants have to recertify for each one.
- Note that the outdated technology of the City is an issue.
- Add the fact that limited coordination across health groups (that provide care and housing subsidies), housing groups (who build the units), and the non-profits (that support people with disabilities) can create inefficiencies and more challenges for people with disabilities to get housing.
- Note that ID is also challenging for immigrants, people with disabilities transitioning out of institutions, as well as Trans populations if their gender does not match. It can take 4 months to get an ID and not enough time for the interview. Currently, IDNYC is inconsistently accepted.

Stakeholders' recommended solutions:

- **Expand Individualized Case Management to help people move out of institutions.**
 - Current program exists for people with developmental disabilities: Housing Navigators (run by NY Alliance for Inclusion and Innovation) with A-to-Z services, beginning with planning and into the transition to more independent housing options, considering whether they should work and what supports they need.
- **Convene a task force between HPD, DOH, MOPD, HRA, Office of Crime Victims, and service providers about health and housing for PWD transitioning out of nursing homes.**
 - The Medicaid Redesign team is a good example – they created an offshoot program to create more realistic and targeted housing options for people with disabilities.

- **Eliminate or Reform NHTD (Nursing Home Transition and Diversion) vouchers and create a comprehensive approach to moving people out of institutional settings++.**
 - Need a new high profile, well-funded program. Many stakeholders felt that the current NHTD does not work, has limited subsidies, and cherry pick the most able individuals. Stakeholders also flagged administrative barriers, like length of time to get funding (can be a year) and the need to show a lease before getting approved for funding (you cannot get a lease without the funding).
- **Advocate for using Medicaid to pay for housing support for people with disabilities to live independently**
 - HHS secretary noted that this may be soon expanded into Medicaid-covered service, and NYC should use Medicaid to pay for housing.
- **Create a streamlined, centralized web system where you can put in your income, statuses, and other important info to be able to search and filter affordable housing and/or benefits that you might qualify for++.**
 - Upgrading the City's technological infrastructure could reduce burden on Housing Ambassadors, so people can do it on their own. Connect people to housing options they might qualify for because of intersecting identities and be able to prioritize tenants based on greatest intersecting needs.
 - Currently, each category has its own program, application system, agency, and is very bureaucratic.
- **Streamline benefits and create a single platform for building management, so that tenants can update their information to simplify and streamline recertification.**
 - When multiple subsidies and programs are in place for a building or apartment, tenants have to recertify and re-do processes multiple times.
- **Change City voucher eligibility criteria to more proactive house those living in the streets, undergoing eviction, or staying with family members++.**
 - Some populations are afraid to enter the shelter system (due to language barriers, accessibility barriers, or safety concerns), and couch surf with relatives, but then are not counted as homeless.
- **Expand City government service office hours to evening and weekends to accommodate people who work full time jobs to access the benefits and support they might need.**
- **Train agencies and service providers to make ADA reasonable accommodations and language access more standardized; intentionally get input from disability communities++.**
 - Improve accessibility of forms and competency of staff. Basics like size-18 font, no italics or underlining, flushed left; plain language 4th or 5th grade reading level, agendas in advance; sign language interpreter; noting accessible entrances, etc.
- **Revamp marketing guidelines to expand legal forms of ID, simplify the referral and application process to make less burdensome for people in crisis, and have more agency oversight++.**
- **Test, reform, and establish a more refined due process for people with disabilities in the housing lottery process; improve oversight of marketing and lease up.**
 - Require notice and reasoning for waitlist and option to appeal; create special rules and exceptions in documents required for PWD (e.g., a notarized letter from the nursing home and other verification to replace ID if necessary).

- **More support and funding for Housing Ambassadors, and more proactive outreach across a wide geography and for specific populations++.**
 - Enable expansion of roles to include assisting applicants with their applications who have been denied to appeal rejections and provide more individualized follow up and planning for housing stability. Ambassadors are needed to support unique populations, such as veterans, DV survivors, LGBTQ, and more.
- **Establish and enforce rule that says landlords cannot deny an applicant with a disability because they couldn't come to see the site and sign – enable letters to be a proxy for ID and in-person interview.**
- **Expand housing options for people with a range of developmental disabilities; advocate for expansion and formalization of the Office of People with Developmental Disabilities (OPWDD)'s definition of “developmental disability.”**
- **Create training and guidelines for marketing agents and health care providers on mental health competencies to support applicants and their rights/responsibilities.**
 - Sometimes health care providers can get in the way of a person with disabilities to obtain housing (e.g., a hospital refusing medication or agency having a different opinion of the extent of someone's disability because they don't fit the image of who they had in mind as someone who is bipolar or other invisible disability).

Issue 7d: Barriers for justice-involved populations

Stakeholders expressed concern that there are significant barriers to living in publicly-supported housing for people who have been involved in the criminal justice system.

Stakeholders' suggested edits:

- Add that even well-intended organizations discourage applicants from applying.
- Add that NYCHA permanent exclusion policy can leave people stuck in homeless shelters if their support networks are all in public housing. It also does not give an opportunity for family members to be care givers to the elderly.

Stakeholders' recommended solutions:

- **Eliminate or reform NYCHA Permanent Exclusion Policy++.**
 - Make exceptions for care-givers of elderly family members in NYCHA; decrease the severity of conducts that triggers a potential termination of tenancy of an individual; end pre-conviction decisions, as arrests can rely on unsubstantiated allegations; require investigators to properly identify themselves and inspect with dignity for residents; expand outreach and education to NYCHA families about the application to lift permanent exclusion. Some stakeholders wanted to eliminate the policy, while others sought reforms.
- **Expand reentry pilot to increase access to NYCHA for justice-involved people and their family members++.**
 - Work with applicants to expunge history while they are on the NYCHA waitlist. Need more restorative approaches. Have a more interactive process to review the case that may involve the community.

- **Create incentives for landlords to rent to tenants with a conviction history, whether tax incentive, or up-front payment of voucher, etc.**

- **Reform HPD Marketing Guidelines to include clearer guidelines and less discretion from the provider on the use of background checks for eligibility++. Spot check and enforce.**
 - Currently, the guide gives discretion to providers, resulting in varying policies that ultimately discriminate against those with records of arrest, despite non-conviction, completed time, or successful rehabilitation.

Contributing Factor #8: The availability, type, accessibility, and reliability of public transportation

Issue 8a: Inequitable rapid transit access

Despite NYC and the region's extensive rapid transit network, stakeholders said that there remain large inequities in neighborhoods' access to reliable rapid transit to important job centers and services. Residents who live far from rapid transit face challenges with multi-modal transit and connectivity, as well as challenges in late-night and early-morning transit options with regard to safety and frequency. Lack of reliable transit in suburbs that have quality schools and environments can also force people to live in the city if you cannot afford a car. Stakeholders also said that the growing use of for-hire vehicles leads to congestion, which impacts the speed and reliability of buses, which predominantly serve people of color.

Stakeholders' suggested edits:

- Add that work on Fast Forward happens on nights and weekends, which affects low-income people working late hours.
- Add concerns about the city-wide limits being placed on Uber/Lyft, which stakeholders fear could negatively impact outer borough low-income communities who rely on these services because of the limited service of yellow and green cabs in those areas.
- Emphasize inter-borough travel challenges. The subway is designed to get people in and out of Manhattan, but there are growing job centers in outer-boroughs.
- Add "where there may be affordable housing" after the word 'suburbs' in the second to last sentence.

Stakeholders' recommended strategies:

- **Conduct comprehensive planning around housing, economic development, and transit; upzone transit corridors to enable housing growth and job connectivity++.**
 - Promote more interagency coordination to conduct Transit-Oriented Development (TOD). Promote economic development and jobs in outer boroughs with good transit access. Prioritize transit investment in historically disinvested neighborhoods.
- **Extend transit into rapid-transit-desert areas, paired with affordable housing development and protections++.**
 - Sometimes these areas without rapid transit are poor neighborhoods that are not served, but sometimes they are higher income areas that are not served, which makes it hard for low-income people to consider moving there. Limited public transit may also limit job growth in those areas.
- **Implement the Tri-boro Proposal to expand rapid transit on underused freight lines between Brooklyn, Queens, Bronx, and potentially SI.**
 - It is cost effective since the infrastructure already exists. It would service neighborhoods that are majority low-income communities of color and some low-density areas that do not have access to rapid transit. It connects multiple job centers where low-income people work, and has environmental justice benefits.
- **Apply an equity framework and establish improved services and connections in areas not easily served by subways for low-income individuals++.**
 - Prioritize capital funding to services for low-income communities to decrease disparities. Late night service on buses, for example, is expensive but serves low income workers. Reinstate buses or

shuttles in low ridership areas. Explore costs of subsidizing low-income workers with late night trips home via for-hire vehicles rather than running empty buses. Promote more equitable distribution of transportation alternatives such as bike lanes.

- **Expand and improve bus service for reliability++.**
 - Improve management and enforcement of street space. Add more bus lanes with dividers. Avoid eliminating routes because of low ridership—those routes often had people with disabilities who relied on those buses. Ridership may have been low because of speed issues, not a lack of demand/need. Prioritize cross-borough connections in areas far from subway service.
- **Implement Congestion Pricing and other initiatives to reduce traffic, which can affect bus efficiencies++.**
 - People who drive overwhelmingly have higher incomes.
- **Make the ferry service more accessible and easier to use, with connectivity to subway**
- **Improve bike safety strategies and implement universal and free bike share**
 - Biking can be key to connecting to other transit. Make options available for people with disabilities.
- **Reduce restrictions on E-bikes and expand bike share to serve low-income workers who use e-bikes for their work to use for commutes.**

Issue 8b: Limited universal accessibility features

Stakeholders expressed concern that the limited accessibility of subway stations, including its elevators, platforms, and car designs, present difficulties for those with wheelchairs or strollers. These difficulties are particularly acute in outer borough areas where the concentration of people with disabilities is highest and travel distances to job centers and governmental offices are longest. Stakeholders also said that wayfinding in public transit is not friendly for those with visual, auditory, multi-lingual, and multi-sensory communication needs. Additionally, there are still many bus stops that are accessed by challenging sidewalks and that have poor shade, lighting, and no seating options.

Stakeholders' suggested edit: emphasize the aging population and future needs.

Stakeholders' recommended solutions:

- **Redesign streets and sidewalks for universal access and less conflict amongst users; create a plan for integrated mobility strategies for neighborhoods++.**
 - Need better curb cuts and other sidewalk accessibility features. May need to take space from cars and parking.
- **Engage people with disabilities in the development of new transit options and incorporate smart designs++**
 - Newly renovated subways with tile flooring can be slippery, and new design of buses can be hard to get in/out of. Bright lights can be really challenging for some people with visual difficulties. Some of the new buses have very bright lights for safety reasons, but this can be challenging.
- **Ensure buses and subways are accessible for people with auditory, visual, and ambulatory disabilities, particularly upcoming stops, emergency announcements, and re-routes++.**

- Need clear auditory announcements with visual communication, back up methods to get information in case one method fails, and considerations for people with overlapping and multiple disabilities. Need better edge markings, reduced gaps between the platform and car, improved elevator repairs, and multilingual accessibility accommodations.
- **Aim to make all stations accessible.**
- **Leverage private philanthropic dollars to implement accessibility for all initiatives.**

Issue 8c: Limited affordable and reliable accessible transit options

Stakeholders mentioned that there are limited affordable, reliable, accessible transportation options for the elderly and people with disabilities. Access-a-Ride can be unreliable, have long waiting times, and require booking far in advance. Additionally, for-hire vehicles, dollar vans, and car- and bike-share services are often not compliant with ADA-accessibility rules.

Stakeholders' recommended solutions:

- **Expand Access-A-Ride E-Hail Pilot to create a more efficient experience.**
- **Require minimum number of accessible cars for ridesharing and cabs, and create reduced fares for seniors and people with disabilities.**
 - Create an accessibility feature to fill the gap between market costs and what people can afford.

Contributing Factor #9: Location of proficient schools and school assignment policies

Issue 9a: School admissions and enrollment policies

Stakeholders said that New York City's complicated mix of elementary school residency preferences (i.e. school zones) and school-choice policies reinforce residential segregation. Families with more financial resources—who are disproportionately white—can pay for housing in school zones with higher-performing schools. Families who live in school zones with lower performing schools face complicated decisions, and certain families—including immigrants and parents with limited English proficiency—may struggle to navigate the system. Additionally, as students age, middle- and high-school assignment policies that use test scores, grades, and attendance records also reinforce segregation within schools and disparities in access to opportunity. Stakeholders noted that there is a lack of willingness by some parents to have conversations about the racial impact of these policies.

Stakeholders' suggested edits:

- Note importance of differentiating between elementary, middle, and high school and the different challenges faced at each level.
- Add that since the No Child Left Behind policies, test scores have become how families understand school quality, which has influenced today's segregated living patterns and inequitable schools. There are many quality schools by other measures that parents do not send their kids to because they believe high test scores indicate quality schools.
- Note that while there are three districts with current School Diversity and Integration Plans, there are additional districts interested in creating their own plans, but face challenges with overcoming White and wealthy parents that take on segregationist positions. Some districts have no integration advocates and will not voluntarily change without a mandate.
- Add that when integration happens, people of color face interpersonal racism from White families.

Stakeholders' recommended solutions:

- **Establish HPD policy on how new affordable housing connects with school assignments++.**
 - Develop limited equity co-ops and affordable housing for families in areas with high quality school zones. Give lottery preference to families with school-age children for housing in high quality school zones as units become available. Create opportunities for homeownership or affordable housing near schools. Create incentives to house teachers, as it is beneficial to have teachers who are members of their community.
- **Eliminate off-site inclusionary housing provisions, which can make a difference in school district access.**
- **Change narrative of what makes a “good school” (especially elementary and middle) and ensure there are high quality schools in each school district++.**
 - A new narrative and measurement on quality needs to be established, one based on socio-emotional and socio-cultural skills; civics. Create partnership with the real estate industry, local residents, and community-based organizations to understand this.
- **Require all middle schools city-wide to get rid of screening and promote diversity in admissions through a combined top-down, bottom-up approach++.**
 - Give each district the opportunity to create their own alternative to screening and a diversity plan. Top-down/bottom-up approach helps to make it more of a collaborative process and limit opposition

- Conduct a campaign to educate students, parents, and Community Education Councils (CEC)'s to conduct racial justice, anti-oppression trainings to enable conversations about segregation.
- **Study the racial impact of exams on specialized high schools**
- **Remove elementary, middle, and high school residential-based school zones++**
- **Identify districts with high rates of segregation and mandate intentional plans with community engagement to promote integration++**
- **In gentrifying neighborhoods where school enrollment has decreased, consider consolidating schools and repurposing school buildings into (mixed-use) affordable housing.**
 - In Bed Stuy and Downtown Brooklyn, for example, as affordability shifts and families without kids move-in, it changes what the schools look like—leading to under-enrollment. Create stakeholder groups that look at the impacts of under-enrolled schools or school districts. Conduct school planning in partnership with the community so people can problem solve together.

Issue 9b: Accessibility of school facilities and availability of programs

Stakeholders reported that schools that are fully accessible for children with physical disabilities are limited, as are those that offer special needs services to children with other disabilities. This in turn forces children with disabilities to attend schools that may not be near their homes. Limited building accessibility not only impacts students, but also parents and teachers with disabilities.

Stakeholders' recommended solutions:

- **Prioritize funding to create physical accessibility modifications for schools to accommodate students, teachers, and parents with disabilities.**
- **Expand investments in afterschool programming for youth with disabilities.**
- **Expand Community Schools and strategies that address the whole child.**