July 28, 2020

Dear Commissioner Visnauskas:

We are writing to you to express our deep concern with regard to HCR’s rollout process of the “COVID-19 Rent Relief Program.”

As we stated when the bill was being considered, $100 million will not keep New Yorkers in their homes long-term. Our current projections estimate over 1.5 million New Yorkers have not been able to pay rent, and an estimated $2.3 billion is owed in rent. As of now, New Yorkers are faced with the likelihood of an unprecedented mass displacement. We are disappointed that HCR has not yet risen to the occasion to prevent the displacement of those who are most seriously impacted by Covid-19, and are most at risk—communities who are disproportionately Black, Brown, immigrants, essential workers, or those looking for jobs that do not exist and won’t for some time. By deliberately choosing to completely overlook public outreach and to not make the Rent Relief Program uniformly accessible to all affected renters, HCR is signaling that they do not take seriously the impending state wide devastation of home loss due to the pandemic.

We are writing as a state-wide coalition that collectively represents and works directly with thousands of New Yorkers. None of our organizations were given any prior notice of the Rent Relief Program page going live on HCR’s website, so we received the information and FAQs two days prior to the application going live via a press release put out by the Governor’s Office on the evening of June 14.

The agency failed to give the general public as well as Community Based Organizations, community organizers and housing advocates insufficient notice (if at all) about the application process remaining open for only two short weeks. In addition, HCR has not proactively or widely circulated clear information, a meaningful language access plan, or provide adequate support to tenants applying to the program.

Without prior notice, two weeks are not enough time for families to prepare documents and submit an application. The online application is not accessible to those with the most limited resources, and was initially only offered in English and recently Spanish, limiting access to non-native English renters. Although HCR translated the written application into six languages, the agency still requires it to be submitted in English. The written application also requires access to a printer, inaccessible to many. At this time, public facilities with access to internet and
printing services, and social service institutions that provide technical support and help community members navigate benefits systems like these, can not safely operate or open at a capacity that meets the needs across the state. Given the life-threatening concerns of the pandemic, tenants should not be forced to put themselves at further risk to apply for the program.

The Rent Relief Program further fails tenants who are undocumented by flat out excluding them, and also fails tenants receiving unemployment benefits at this time by not taking into account the artificially high incomes tenants will be reporting due to expanded Federal CARES Act that expire August 1, when the application period closes. The program is not considering the realities faced by program applicants, allowing many to fall through the cracks. HCR has shown us time and time again that the agency does not prioritize New Yorkers with limited English language skills, poor New Yorkers, undocumented New Yorkers, those who receive benefits assistance, and who lack access to internet, technology, and internet devices.

Our member organizations represent diverse multilingual communities all over New York, and have received a high volume of complaints from tenants who are monolingual speakers of languages other than English, who reported that the application can only be submitted in English and that they were unable to get help from the helpline provided by HCR on the website. The vast majority of tenants we have personally spoken to have had technical issues, beyond language access, with the online application, whether it was difficulty accessing pop the application at all—we are aware that the site was briefly down on July 17— or the website not accepting their application without a clear explanation or instructions.

Given that our coalition and many members have been in dialogue with HCR about issues, including reforming HCR to be more accessible, addressing language justice, and creating a system easier to navigate for the past few years, we expected more transparency and communication about the rollout of the Rent Relief Program. Prior notice would have allowed us to better prepare and inform tenants to understand their eligibility and the steps of the application process so that they could respond within the two-week application deadline. It would have further allowed us to alert the agency to potential issues surrounding language and technology access, as well as other accessibility concerns.

In the interest of protecting New Yorkers and making rent assistance accessible to all, we urge the following:

- **HCR provides a detailed outline** of how it will make the Rent Relief Program application accessible to non-native English speakers, and how the online and written application will be made accessible to tenants without technical resources. These plans should include proactive measures to reach out to the public, as well as measures to be more responsive to requests for information and support from individuals. These plans should be implemented within days.
- **HCR extends the deadline for 4 additional weeks** (until at least August 28) to continue to receive Rent Relief Program Applications.
- **HCR honors and immediately schedules the coalition’s original meeting request** submitted in March 2020 in regard to the implementation of HSTPA 2019 and overall agency practices.

HCR must be transparent now if it wants credibility for implementing all future critical rent regulations. As always we look forward to hearing your response to our concerns, and to working with you towards a better future for renters in New York.

Regards,

Members of Housing Justice for All

List of organizations (in formation) and in alphabetical order:

Asian Americans For Equality (AAFE)
Association for Neighborhood & Housing Development (ANHD)
Bushwick Bed-Stuy Tenants Coalition (BBSTC)
CASA - New Settlement Apartments
Central Park Gardens Tenants’ Association
Chinese-American Planning Council (CPC)
Citizen Action of New York
Communities Resist
Cooper Square Committee
Community Service Society
Crown Heights Tenant Union
Flatbush Tenant Coalition
Full Time Tenant Union
Good Old Lower East Side
Housing Organizers for People Empowerment (HOPE)
Housing Rights Initiative
Make the Road NY
Met Council on Housing
MHACTION
MinKwon Center for Community Action
Mobile/Manufactured Homeowners Association of Suffolk, Inc.
Neighbors Together
New York Communities For Change (NYCC)
Northern Manhattan Improvement Corporation
Northwest Bronx Community and Clergy Coalition (NWBCCC)
The Northwest Bronx Community and Clergy Coalition
People United for Sustainable Housing (PUSH) Buffalo
Riverside Edgecombe Neighborhood Association (RENA)
Stuyvesant Town–Peter Cooper Village Tenants Association
Syracuse Tenants Union
Tenants PAC
UHAB
Urban Justice Center - Safety Net Project
VOCAL NY
Woodside on the Move
Zara Tenants’ Coalition

CC: Governor Andrew Cuomo, Majority Leader of the NY Senate Andrea Stewart-Cousins,
Speaker of the NY Assembly Carl Heastie.