



NYC'S
A NEW LENS FOR **HOUSING**
PLAN HOUSING PLAN FOR A
CITY OF IMMIGRANTS

 **CHPC**
NEW YORK CITY

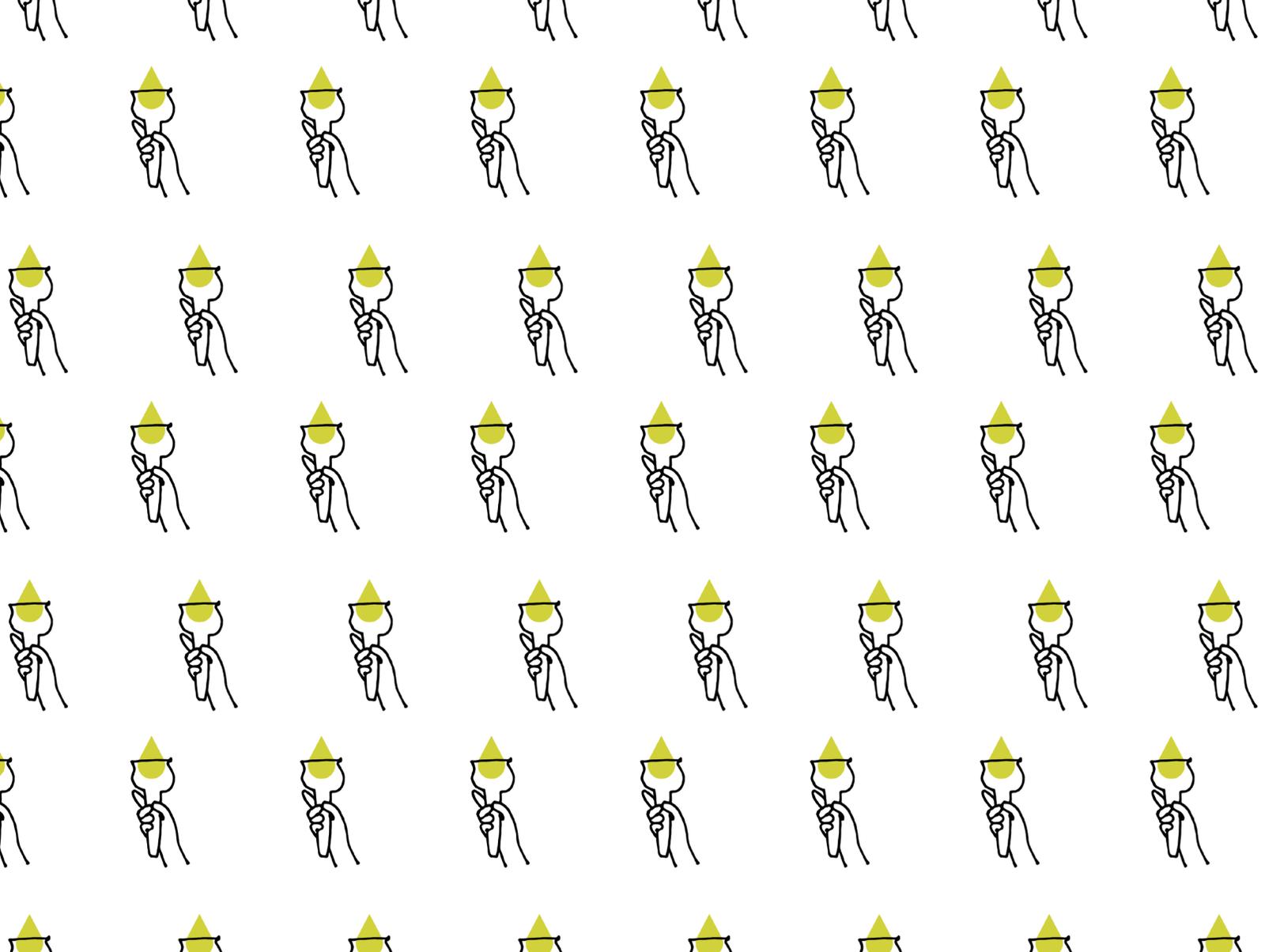


TABLE OF CONTENTS

Citizens Housing & Planning Council	5
Acknowledgements	6
CHPC Board Of Directors	8
A New Lens for NYC’s Housing Plan	10
A Note on COVID-19	16
New Lens on a City of Immigrants	22
A City of Immigrants is Born	23
Our City of Immigrants Today	30
A Sanctuary City for the Future	36
Housing Plan for a City of Immigrants	40
Goals.....	41
1. Promote equitable access to housing, unrestricted by nationality or legal status.	42
2. Provide flexible & diverse housing options to better meet the needs of immigrant New Yorkers.....	56
3. Leverage housing policy to create economic opportunities so that immigrant communities can thrive.	73
Citations	86

ABOUT CHPC

Citizens Housing & Planning Council (CHPC) is a non-profit research and education organization focused on housing policy and planning in New York City. Since our founding in 1937, CHPC’s mission has been to develop and advance practical public policies to support the housing stock of the city by better understanding New York’s most pressing housing and neighborhood needs.

For more than 80 years, CHPC’s research and education work has helped shape public policy to improve the city’s housing stock and quality of life in New York City’s neighborhoods. A team of expert research staff is led by a diverse board of practitioners in the fields of urban planning, architecture, zoning and land use law, housing finance and development, and community development.

Our work brings clarity to New York City’s housing issues by presenting research in relatable and engaging ways. Our agenda is practical and always begins with questions, not answers. It is the data, our analysis, and its relevance to the real world that drive our conclusions.

CITIZENS HOUSING & PLANNING COUNCIL

ACKNOWLEDGEMENTS

HOUSING PLAN FOR A CITY OF IMMIGRANTS

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A NEW LENS FOR NYC'S HOUSING PLAN

New York has an extraordinary housing production goal, unparalleled among U.S. cities. Working in partnership with the housing industry, the City has committed to creating and preserving 300,000 affordable apartments by 2026. New York has become a highly efficient factory for generating affordable housing, with each successive housing plan promising an ever-increasing number of units.

Yet housing policy can have a far greater reach beyond developing a certain number of affordable housing units. Housing policy is about social justice, health, economic development, financial opportunity, stability and mobility, neighborhood revitalization, and many other key aspects of social, economic, and urban policy. An exclusive preoccupation with counting the number of affordable housing units can make us lose sight of the core values underpinning our policies, making it difficult to articulate to communities why the government is building housing in their neighborhoods. Advocates and low-income communities find themselves asking: What is the purpose of this plan? Who is benefiting and how?

When unit-counting is first and foremost, resource allocation and policy priorities are shaped to meet a quantitative goal, rather than to align policy with our values as a city and meet the greatest community needs. Despite the dire conditions of New York City's public housing stock, NYCHA residents have largely been excluded from recent housing plans due to the "unit-counting" lens. Although basement apartment conversions are currently an inefficient and costly way to create new units, streamlining a pathway to conversions would advance financial stability for low-income homeowners and expand affordable housing options for underserved renters.

New York City's current housing plan both benefits and suffers from its preoccupation with counting units. Unit-counting is an effective metric for driving the

gears of government towards a single, clear, quantifiable goal, but loses the broader purpose of housing policy. The range of voices involved in crafting the housing plan has been restricted, and its limited focus has led to growing frustration and sentiment among communities that their needs are not being met.

The next housing plan provides an opportunity for communities and policymakers to widen the discussion, articulate new metrics, and develop a shared vision of housing policy for New York City.

A New Lens for NYC’s Housing Plan is an initiative by Citizens Housing and Planning Council (CHPC) to explore this opportunity. CHPC is leading a strategic visioning process to reframe New York City’s next housing plan to look beyond a unit goal. Through research, interviews with housing policymakers and practitioners, stakeholder convenings, public events, and publications, CHPC is bringing new voices into the discussion around New York City’s housing policy and building excitement around new lenses that housing policy could use. CHPC’s multi-pronged engagement series will equip the next generation of policymakers in New York City with a menu of new ideas, approaches, policies, and metrics to build from.

CHPC’s A New Lens for NYC’s Housing Plan report series aims to demonstrate how New York City’s next housing plan could leverage the power of housing policy to advance a wide range of public policy goals, with each publication adopting a different “new lens.” First, data and analysis are used to articulate the needs that housing policy through the new lens could serve and the problems that it could help us solve, establishing clearly defined policy goals. The reports then lay out strategies and objectives for policy reform to advance those goals, illuminating what a housing plan through each new lens could look like.

CHPC hopes that by demonstrating the process of identifying needs, establishing goals, and developing strategies to advance them, the New Lens report series will help catalyze discussion around how the next housing plan could help us develop and advance a shared vision for the future. ■

A New Lens for NYC's Housing Plan



A FEMINIST HOUSING PLAN

Housing policy is rarely discussed as a way to address gender inequality or provide an economic safety net for women. How would we measure our success if the next housing plan was explicitly feminist?



RX FOR HOUSING: HOUSING IS HEALTHCARE

Our health and our housing are connected, especially for households living in poverty. What if the goal of the next housing plan was to improve the health of New Yorkers?



HOUSING PLAN FOR RACIAL EQUITY

Though the legacy of discriminatory housing policies has persisted for decades, NYC has yet to see a housing policy agenda directly aimed to combat racial inequality.



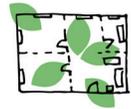
HOUSING PLAN FOR A CITY OF IMMIGRANTS

The next housing plan could advance opportunity for millions of New Yorkers and align the city's housing policy with its past, present, and future as a city of immigrants.



LGBTQ+ HOUSING POLICY

NYC's housing policies must support the LGBTQ+ New Yorkers that have found community in our city for decades.



A GREEN HOUSING PLAN

A NYC housing plan defined by a bold commitment to green principles would help turn the tide of climate change.

VISIT WWW.CHPCNY.ORG TO LEARN MORE.



COVID-19 RESPONSE AND RECOVERY

Since the onset of COVID-19, CHPC has been grappling with the housing policy issues that the pandemic has laid bare and the role of housing policy in advancing New York City's recovery towards a safer, healthier, and more equitable future.

CHPC released the following essay in May 2020, at the height of the pandemic, to demonstrate how a Housing Plan for a City of Immigrants could advance COVID-19 response & recovery.

Immigrants have always been a key force driving New York City's success. Newcomers from around the world established New York as a major hub in a burgeoning young America, drove the city's massive population growth throughout the 19th century, and fueled its industrial workforce and booming economy during industrialization. In the 1970s, when New York was starting to struggle with population loss and economic decline, a resurgence in immigration shifted the city's pathway forward, and has since led its transformation into one of the most prosperous cities in the world.

Nearly 4 in 10 New Yorkers were born outside the United States.¹

Today, foreign-born residents account for 37% of New York City's population and 44% of its workforce.² However, many immigrant New Yorkers are still deprived of equal access to opportunity and quality of life. Foreign-born residents are lower income and experience higher rates of poverty, housing cost burden, and overcrowded living conditions than their U.S.-born neighbors.³ These disparities have never been clearer than in this moment, as the city fights its way through a devastating pandemic, in a time when the livelihood of foreign-born Americans was already threatened by anti-immigrant federal policy reform. A disproportionate share of immigrant New Yorkers are vulnerable to losing their housing due to the economic impacts of COVID-19. Half of the city's small businesses, many of which are suffering crippling financial loss from forced closures, are owned by immigrants.⁴

30% of immigrant-headed households in NYC are severely rent-burdened.⁵

As the city shelters in place, more foreign-born New Yorkers are staying home in overcrowded conditions that are potentially unsafe and make working from home and attending school online especially difficult.⁶

68% of overcrowded households in NYC are headed by immigrants.⁷

Immigrants are also disproportionately represented among the city's essential workers, who do not have the option of staying home and bear greater risk of exposure to COVID-19 as a result. For nearly 1 out of 5 frontline workers born outside the U.S., including 27% of grocery store and bodega workers, lack of citizenship status creates an additional layer of vulnerability.⁸ Meanwhile, thousands of undocumented residents living in informal housing arrangements are confined to substandard living conditions that can cause and exacerbate illness.

53% of frontline workers are foreign-born, including 70% of workers in building cleaning services.⁹

The COVID-19 pandemic has laid bare these inequalities and underscored the importance of eliminating them. As the transformative impacts of this pandemic set in, both foreign-born New Yorkers and continued immigration will be instrumental to the city's recovery.

To continue reaping the benefits that immigrants have provided for centuries, New York needs to ensure that these communities have access to opportunity and quality of life. Fifty years ago, immigration to New York counteracted urban flight, preventing the city from seeing massive population loss that would have had detrimental impacts.¹⁰ Beyond adding a critical mass of population that bolstered the city's tax base, immigrants also played a key role in revitalizing New York and fueling its prosperity by buying real estate in disinvested neighborhoods, establishing businesses and growing the local economy, and creating ethnic enclaves that have shaped New York's rich and unique identity.¹¹

As the city moves through the COVID-19 pandemic and strives to recover, it is essential to align policy with New York's past, present, and future as a city of immigrants. In the short term, this means ensuring that immigrant communities disproportionately impacted by this pandemic are supported accordingly. For example, many foreign-born New Yorkers and mixed-status households will not have access to federally provided relief or assistance, and local programs are needed to ensure that these residents can weather the economic impacts of the crisis. ■

MOVING FORWARD, NEW YORK NEEDS TO LEVERAGE ITS HOUSING POLICY TO MEET THE UNIQUE NEEDS OF ITS INCREDIBLY DIVERSE FOREIGN-BORN POPULATION, AND TO EMPLOY EVERY MEANS POSSIBLE OF PROTECTING OUR IMMIGRANT COMMUNITIES.

1. U.S. Census Bureau. American Community Survey (ACS) 1-year Estimates, 2018 for Public Use Microdata Areas (PUMA).
2. New York City Mayor's Office of Immigrant Affairs (MOIA). *State of Our Immigrant City: MOIA Annual Report for Calendar Year 2018*. MOIA, 2019. https://www1.nyc.gov/assets/immigrants/downloads/pdf/moia_annual_report%202019_final.pdf.
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5. American Community Survey, 2018 1-year estimates.
6. For more on the impacts of overcrowding on families sheltering in place: Touré, Medina. "Remote learning exacerbates longstanding hurdles for low-income families." *Politico*, April 16, 2020. <https://www.politico.com/states/new-york/albany/story/2020/04/16/remote-learning-exacerbates-longstanding-hurdles-for-low-income-families-1276811>.
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10. Salvo, Joseph. J. & Lobo, Arun P. "Immigration and the Remaking of New York." *Journal of Immigrant and Refugee Services* 1, no. 1 (2002): 5-20. https://doi.org/10.1300/J191v01n01_02.
11. Office of the State Comptroller. *The Role of Immigrants in the New York City Economy*. Report 17-2010, 2010. <https://www.osc.state.ny.us/osdc/rpt17-2010.pdf>.



NEW LENS ON A CITY OF IMMIGRANTS

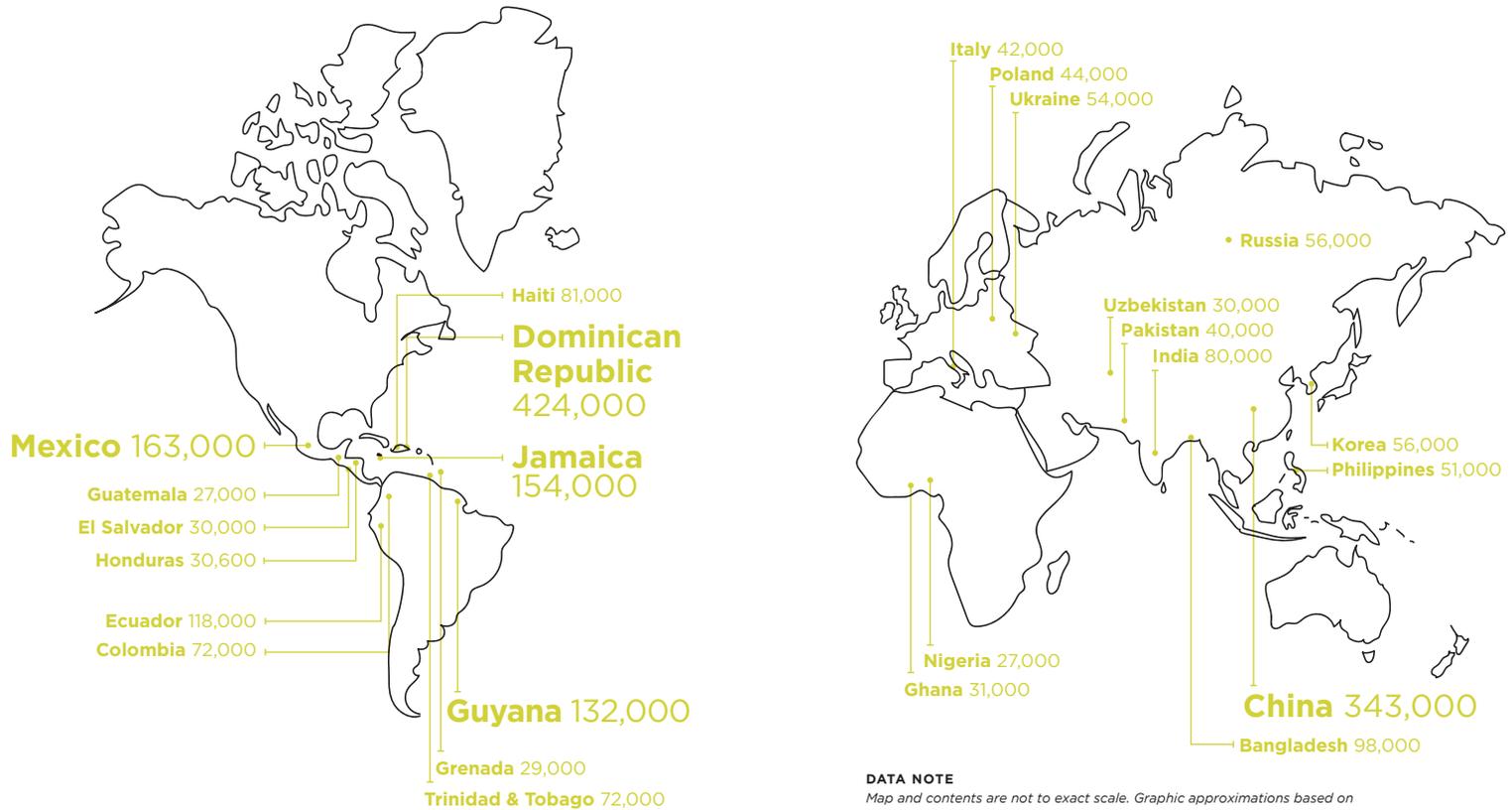
Immigration has always been a key force driving New York City's success. Millions of newcomers from across the globe have led the city's growth and prosperity and shaped the unique cultural fabric of our neighborhoods.

Today, immigrant New Yorkers account for a greater share of the population and play a more integral role in the city than ever before, yet many of their needs are insufficiently met. Meanwhile, immigrant communities nationwide have come under attack by the federal government. New York has a moral obligation to ensure the stability and success of its foreign-born residents, whose livelihood also bears important consequences for the future of the city and its entire population.

A CITY OF IMMIGRANTS IS BORN

Born as a Dutch settlement that grew into the colony of New Amsterdam, New York City was quickly established as one of the largest, most important cities in a growing young America due to an insurgence of European immigrants that lasted for centuries. New York was home to the nation's first immigration arrivals station, Castle Garden, and to the first federal immigration port that later replaced it at Ellis Island.¹ Throughout the late 18th and early 19th centuries, as many as 10,000 new arrivals to Ellis Island per day fueled the city's booming workforce and industrial economy, solidifying its regional and national significance.²

Where Immigrant New Yorkers are from: Top 25 Countries of Birth



DATA NOTE

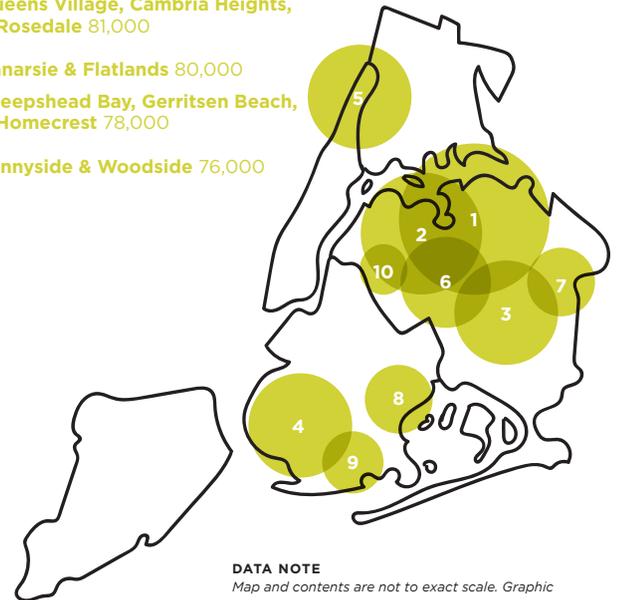
Map and contents are not to exact scale. Graphic approximations based on CHPC analysis of 2018 American Community Survey 1-Year Estimates for Public Use Microdata Areas (PUMAs) by the U.S. Census Bureau.

Federal immigration reform in the 1920s and the aftermath of World War II brought the city's foreign-born population to an all-time low over the next few decades.³ By the early 1970s, New York was one of many industrial cities in the Northeast beginning to struggle with population loss and economic decline, largely stemming from the nationwide explosion of suburban living and the waning significance of industry and manufacturing. These trends continued for years in most of the region's urban areas, producing detrimental impacts still visible today in cities like Philadelphia and Detroit.⁴ Yet New York had a different future in store, in large part thanks to a critical resurgence in immigration made possible by the Federal Immigration Act of 1965. Since this wave of new migrant arrivals began, foreign-born New Yorkers have gained a larger and larger presence and led the city's remarkable transformation into the booming metropolis we know today.⁵

As the immigrant population has boomed in the last fifty years, New York has reaped immense positive impacts. Foreign-born New Yorkers revitalized neighborhoods that were previously in decline, bolstering property values in some neighborhoods and stabilizing the housing market in others.⁶ Newcomers built social and cultural networks that have helped facilitate more immigration, adding further to the citywide population and municipal tax base and in turn aiding the provision of essential public services and infrastructure. Immigrant communities have strengthened the economy by investing in their homes and neighborhoods, growing small businesses, and creating new jobs.⁷ Some research even shows that immigrant New Yorkers have made the city safer by contributing to decreased crime rates.⁸ New York would not be the city it is today without the millions of people from across the world that have chosen to call it home.

Where Immigrant New Yorkers Live: Top 10 Neighborhoods

1. **Flushing, Murray Hill, & Whitestone** 135,000
2. **Jackson Heights & North Corona** 108,000
3. **Jamaica, Hollis, & St Albans** 102,000
4. **Bensonhurst & Bath Beach** 102,000
5. **Washington Heights, Inwood, & Marble Hill** 99,000
6. **Elmhurst & South Corona** 93,000
7. **Queens Village, Cambria Heights, & Rosedale** 81,000
8. **Canarsie & Flatlands** 80,000
9. **Sheepshead Bay, Gerritsen Beach, & Homecrest** 78,000
10. **Sunnyside & Woodside** 76,000



DATA NOTE

Map and contents are not to exact scale. Graphic approximations based on CHPC analysis of 2018 American Community Survey 1-Year Estimates for Public Use Microdata Areas (PUMAs) by the U.S. Census Bureau.

OUR CITY OF IMMIGRANTS TODAY

The foreign-born population reached a peak of 3.2 million in 2017 and plays a more integral role in the city than ever before. Immigrant residents comprise 45% of the citywide workforce and the majority of workers in industries critical to the city's growth and operations, including transportation, utilities, construction, and manufacturing.⁹ Foreign-born New Yorkers own half of the city's small businesses and account for 43% of its retail workers, supplying essential community services and needs, such as grocery stores, laundromats, restaurants, and hardware stores.¹⁰

Immigrant New Yorkers are crucial not only to the city's workforce and economy, but to the daily lives and well-being of thousands of U.S.-born residents. Half of the city's households include at least one member born outside the U.S., and 61% of children under 18 years of age live with at least one foreign-born parent. Of those children, 85% were born in the U.S and 91% are U.S. citizens.¹¹

The future of our immigrant communities bears consequences for each and every New Yorker, regardless of where they were born.

In spite of their fundamental role in shaping New York City's past, present and future, public policy has not always considered the needs of immigrant New Yorkers and how they may differ from the needs of U.S.-born residents. As a result, immigrant New Yorkers face disadvantages affecting income, employment, housing, and many other

A HOUSING PLAN FOR A CITY OF IMMIGRANTS WILL ADVANCE OPPORTUNITY FOR MILLIONS OF NEW YORKERS AND SECURE THE CITY'S FUTURE AS A DIVERSE, THRIVING METROPOLIS.

governing aspects of quality of life. Foreign-born New Yorkers are more likely than their U.S.-born neighbors to be rent-burdened, severely rent-burdened, living in overcrowded housing, or experiencing poverty. Despite their equal rate of participation in the labor force, immigrant workers have a median earnings of \$13,000 less than U.S.-born workers.¹²

Finally, while the needs of immigrant New Yorkers are overall different than those of U.S.-born residents, they also vary significantly across different communities. The city's foreign-born population is the most diverse in the country, collectively speaking over 200 languages and representing a vast range of nationalities, religious affiliations, and cultural and socioeconomic backgrounds.¹³ These factors, along with legal status, length of tenure in the U.S., and many more impact the way that some groups experience issues such as language barriers, economic constraints, and substandard housing conditions.

Looking at the 10 largest immigrant groups in New York today (see Table 1), median household incomes range from \$35,000 to over 2.5x that (\$96,000). New Yorkers born in each China, Jamaica, Guyana, Haiti and India are all more likely to own their homes than U.S.-born residents, yet only 9% of Dominican-headed and 5% of Mexican-headed households are homeowners. Although the median income of households headed by each Chinese- and Mexican-born New Yorkers is almost the same, Mexican households tend to have more workers generating income. Language barriers are almost never an issue for Jamaican- or Guyanese-born New Yorkers, but over half of Chinese-headed households lack an adult member who can speak and read English very well.

A CLOSER LOOK: NYC'S THREE LARGEST IMMIGRANT COMMUNITIES

Dominican-, Chinese-, and Mexican-born New Yorkers comprise the 3 largest immigrant populations in NYC today. Each group faces different challenges and opportunities that could impact their future in the city.



Compared to Mexican households, 9x as many Chinese households and 2x as many Dominican households own their home.



Dominican households' median income is about 75% of the median income of each Mexican and Chinese households.



5 out of 10 Chinese households are Limited English Speaking, compared to 4 in 10 Dominican and Mexican households.



Compared to Dominican and Chinese households, more than 2x as many Mexican households are overcrowded.



Compared to Mexican households, 2x as many Dominican and Chinese households are multi-generational.



Mexican households, on average, are 33% larger and have 33% more workers than Chinese and Dominican households.

**Table 1:
Household Characteristics &
Citizenship Rate: NYC's 10 Largest
Foreign-Born Populations by
Place of Birth (2018)¹⁴**

Place of Birth	Median Household Income	% Over-crowded	Avg. Household Size	% U.S. Citizens	% Homeowner	% Multi-Generational	% Limited English Speaking	Avg. # of Workers/ Household
Dominican Republic	\$35,000	16%	2.9	53%	9%	10%	41%	1.4
China	\$46,000	16%	3.0	53%	46%	10%	56%	1.6
Mexico	\$45,000	39%	4.1	17%	5%	5%	39%	2
Jamaica	\$63,000	7%	2.7	71%	43%	10%	0%	1.5
Guyana	\$70,000	9%	3.1	78%	55%	13%	1%	1.7
Ecuador	\$54,000	24%	3.4	45%	22%	10%	41%	1.7
Bangladesh	\$51,000	33%	4.0	60%	29%	12%	35%	1.8
Haiti	\$58,000	10%	2.9	70%	34%	11%	23%	1.6
India	\$96,000	12%	2.9	59%	42%	8%	14%	1.6
Columbia	\$53,000	10%	2.7	53%	29%	6%	43%	1.6
All Immigrant NYers	\$56,000	14%	2.9	57%	32%	8%	29%	1.5

A SANCTUARY CITY FOR THE FUTURE

New York City has never advanced a citywide policy agenda that comprehensively addresses the diverse needs of its foreign-born residents. Policy has often failed to consider how the needs of immigrants differ from those of U.S.-born individuals, or how needs differ from one community to another. In spite of this, the city has reaped the benefits provided by continuous immigration for decades. That dynamic is now beginning to change, in the wake of federal policy reforms threatening immigration into the U.S. and the livelihood of foreign-born communities nationwide.

Since taking office in 2016, the Trump administration has perpetuated anti-immigrant rhetoric and advanced policies to attack immigrant Americans in myriad aspects of life. After significantly expanding the criteria for which immigrants could be prioritized for deportation, the White House ramped up Immigration and Customs Enforcement (ICE) raids in communities, leading to a significant increase in the arrests of New Yorkers.¹⁵ The growing presence of ICE in New York City neighborhoods and the aggressive tactics used by enforcement officers sent fear penetrating throughout the city's immigrant communities.

In 2019, the U.S. Department of Housing and Urban Development proposed a rule to prevent undocumented immigrants from occupying public housing, which would result in the mass eviction of thousands of mixed-status households.¹⁶ Shortly after, Trump implemented changes to the federal "public charge" rule, dramatically restricting immigrants' ability to access the public safety net.¹⁷ In addition to the legal consequences of reform, the federal government's multi-pronged attack on immigrants has created

massive fear and confusion around the repercussions of utilizing public benefits, deterring households from accessing even those benefits to which they remain entitled.

New York is one of many jurisdictions in the U.S. that has defined itself a "sanctuary city," enacting local laws to help more immigrants access public services and eliminate barriers associated with citizenship and legal status. The City of New York has measures in place to limit the cooperation of its police department with federal immigration enforcement agencies.¹⁸ Through the City's IDNYC program, undocumented New Yorkers can obtain a local identification card that can be used during interactions with law enforcement, to open a bank account, and to gain better access to libraries and cultural institutions.¹⁹ In 2019, New York State passed legislation allowing undocumented residents to obtain drivers' licenses.²⁰ Additional statewide measures recently expanded eligibility requirements for financial aid and scholarship opportunities to include more college students from immigrant families.²¹

We have taken critical steps to becoming a sanctuary city, but nationality and place of birth are still dividing factors in New Yorkers' access to opportunity and quality of life. In the current federal policy climate, American cities that wish to truly be sanctuaries, and to retain and grow their immigrant populations, need to leverage their local policy to address the needs of these residents and to ensure their ongoing stability and success. New York should lead the nation's sanctuary cities in not just accepting residents from all over the world, but providing them with an equal quality of life and equal opportunity to thrive.

**...WE MUST SECURE
OUR FUTURE AS A CITY OF
IMMIGRANTS TO PROTECT
THE LIVELIHOOD OF EACH
AND EVERY NEW YORKER,
TODAY AND FOR FUTURE
GENERATIONS.**

The stakes are high. If we do not seize this opportunity, the future of New York will look very different. If immigrant communities cannot succeed here and immigration to the city ceases as a result, New York as a whole will suffer tremendous loss. We will lose a critical mass of population; half our labor force; the majority of workers servicing public utilities, maintaining infrastructure, and building new buildings; billions of dollars in economic output; essential tax revenue and public services; countless neighborhood amenities; some of the most diverse neighborhoods in the world; the stability and well-being of millions of families; and future opportunity for hundreds of thousands of children.

We have a moral obligation to ensure that immigrant New Yorkers can benefit from the same quality of life and access to opportunity enjoyed by their U.S.-born neighbors, and to advance social and economic equity in doing so. We have an opportunity to lead the nation in redefining what it means to be a sanctuary city and to protect immigrant communities nationwide from an increasingly dangerous national climate. Finally, we must secure our future as a city of immigrants to protect the livelihood of each and every New Yorker, today and for future generations. ■



HOUSING PLAN FOR A CITY OF IMMIGRANTS

New York City's housing plan can help secure its future as a city of immigrants by leveraging the power of housing policy to advance three critical goals.

GOALS

Promote equitable access to housing, unrestricted by nationality or legal status.

1

Provide flexible and diverse housing options to better meet the needs of immigrant New Yorkers.

2

Leverage housing policy to create economic opportunities so that immigrant communities can thrive.

3

EXPAND AND STREAMLINE LANGUAGE TRANSLATION, INTERPRETATION, & NAVIGATION SERVICES AND RESOURCES.

1.1

Finding and securing a safe and affordable place to live can be a difficult and stressful process for any New Yorker, yet the challenges are especially great for those with Limited English Proficiency (LEP). Language barriers can make it more difficult to navigate the housing market, exercise one's rights in housing court, and access services to help. These challenges disproportionately impact immigrant New Yorkers, with 29% of immigrant-headed households lacking an adult member able to speak English "very well."²²

29% of immigrant-headed households lack an adult member able to speak English "very well."

To provide LEP New Yorkers with better access to housing, we need to expand and streamline services for translation, interpretation, and navigation, while targeting resources to address the unique needs of different immigrant communities. Not all immigrant New Yorkers experience language barriers in the same way. Those that emigrated from English-speaking countries are less likely to require translated materials, yet may benefit from navigation services. On the other hand, LEP New Yorkers whose native language is less commonly spoken in the city could benefit from expanded translation requirements. New Yorkers speak over

200 languages,²³ but services and materials administered by City agencies are only required to be translated into the top 10 languages spoken by LEP residents.²⁴

15% of LEP New Yorkers (an estimated 290,000 individuals) speak languages excluded from translation requirements for public services and materials.²⁵

Educational attainment and literacy rates, both in English and one's first language, are also key factors in shaping language access needs.²⁶ It is critical to shape translation and interpretation services and resources to ensure that they are sufficient for LEP New Yorkers with varying levels of proficiency in written and verbal communication, both in their first language and in English.

KEY OBJECTIVES:

- **Increase public translation requirements to include additional dialects of the top 10 languages spoken by LEP New Yorkers, as well as the languages of smaller, yet growing LEP populations.**
- **Strategically expand interpretation and navigation resources to prioritize populations with the greatest unmet needs.**
- **Streamline access to language services for LEP residents in the housing market and housing court.**
- **Leverage the strength of community partners that provide services for language access and English language learning.**

A CLOSER LOOK: HOUSING COURT & LEP NEW YORKERS

Ensuring that LEP and all immigrant New Yorkers can enforce their rights in the housing market is a key policy goal. Yet LEP residents face several disadvantages in housing court, discussed in a 2016 report by Legal Services NYC.³⁴ The court system's lack of interpreters can substantially delay proceedings, often requiring LEP litigants to return to the courthouse on different days. These delays are especially burdensome to low-income residents with less freedom and flexibility to miss work or arrange for supplemental child or elder care.

Due to the shortage of housing court interpreters, LEP litigants are often left unassisted in crucial interactions that take place outside of the courtroom itself. LEP litigants may be assigned lawyers that do not speak their primary language. Under these circumstances, LEP litigants are deprived of the ability to discuss settlements and legal strategy with their lawyers prior to going before a judge.

Often, LEP litigants rely on a bilingual friend, child, or other family member to navigate such interactions, creating the risk for misunderstanding and confusion around legal issues that involve technical jargon and require precision. These situations also exacerbate undue burden on second-generation youth who have to fill the role of informal interpreter for their LEP parents in housing court, sometimes missing school to do so.

There is a wealth of second-generation youth in New York City who are apt candidates to serve as interpreters, yet the insufficient number of interpreter positions limits employment opportunities. Meanwhile, advocates report that the mandated prerequisites to become an interpreter are onerous and often misguided, requiring candidates to excel in skills rarely used on the job.³⁵

The way that our system has foisted inordinate responsibility onto second-generation youth is unconscionable, yet there may be opportunity to help these individuals leverage the skills they have built out of necessity towards their own professional development. A program to streamline skills training, certification, and employment as LEP interpreters in municipal housing court could advance opportunity for second-generation New Yorkers, reduce undue burden on future generations, and expand services for LEP litigants.

STRENGTHEN MEASURES TO COMBAT HOUSING DISCRIMINATION, COMMUNITY OUTREACH & EDUCATION. **1.2**

Immigrant New Yorkers are particularly vulnerable to discrimination. In addition to citizenship, immigration status, and nationality, many foreign-born New Yorkers are also subject to discrimination based on factors such as race, ethnicity, and religion. English language skills, culturally traditional dress, and other indicators of “foreignness” can also increase the likelihood of experiencing harassment or discrimination.²⁷ Meanwhile, issues like language barriers, unfamiliarity with U.S. fair housing law, and confusion and fear around federal immigration policy can deter foreign-born New Yorkers from reporting discrimination and enforcing their rights.

Indicators of “foreignness” such as language skills and traditional dress can increase the risk for harassment and discrimination.

As the federal government has advanced anti-immigrant rhetoric and policy reform over the last four years, discrimination against immigrant New Yorkers has increased drastically. In 2016, the first year of the Trump administration’s tenure in office, the NYC Commission on Human Rights reported over twice as many inquiries and claims related to discrimination based on citizenship, immigration status, and national origin as in 2015

Table 2:
Annual Number of Inquiries Received & Claims Filed by the NYC Commission on Human Rights Related to Discrimination Based on Citizenship, National Origin, and Immigration Status (2014-2019)²⁸

Year	# of Inquiries	# of Claims
2014	26	14
2015	79	22
2016	120	60
2017	150	62
2018	150	65
2019	119	48

(see Table 2). Compared to years prior, reports of this nature have continued to occur more frequently, although these numbers nowhere near capture the full scope of the problem. The federal attack on immigrant communities has brought fear around interacting with government or the justice system to a peak, further depriving communities of their rights.

The onset of COVID-19 exacerbated immigrant New Yorkers’ already heightened vulnerability, with discrimination and crimes against Asian New Yorkers surging as the virus spread beyond China and into the U.S.²⁹ Throughout the pandemic in New York City, immigrant workers have lost their jobs at disproportionate rates, while largely being

excluded from federal relief, increasing their risk for housing instability and homelessness.³⁰ At the same time, the federal government has continued to pursue reforms targeting immigrant households, including housing policy changes that could dissuade landlords from renting to them.³¹

Under these dire circumstances, foreign-born New Yorkers are even less equipped to exercise their rights in the housing market. Some households are facing eviction threats, while others have already been illegally evicted after they or one of their household members fell ill from COVID-19. In the informal market, the only source of housing options for many undocumented New Yorkers, renters of single beds and rooms without access to tenant rights have been evicted over fears of virus transmission.³²

At least half of the city's immigrant workers, including an estimated 192,000 undocumented New Yorkers, have lost their jobs due to COVID-19.³³

New York City is in severe need of immediate solutions for increased discrimination in the wake of COVID-19, as well as systemic changes to more effectively combat discrimination in the long term. These may include reporting incentives for victims of discrimination or stronger penalties for offenders. In addition, the City should increase outreach and education to ensure that communities are aware of resources such as the Mayor's Office of Tenant Protections tenant portal and helpline, which can connect users who need it with legal counseling and representation.

KEY OBJECTIVES:

- **Fast-track increased funding and support to frontline non-profits that are helping immigrant communities recover from the economic impacts of COVID-19.**
- **Allocate additional funding and support to immigration legal services.**
- **Prioritize outreach and education in immigrant communities around tenant and renter rights.**
- **Create reporting incentives for victims of housing discrimination.**
- **Evaluate and strengthen penalties for acts of discrimination.**

PROVIDE UNIVERSALLY ACCESSIBLE RENTAL ASSISTANCE.

1.3

New York City operates several programs to supplement the housing costs of low-income households, and to prevent those experiencing financial instability from losing their housing. However, eligibility restrictions on federal funding prevent many immigrant households from accessing these benefits, despite their greater overall need for assistance. Foreign-born workers overall earn lower wages than U.S.-born residents and their households are lower income as a result, despite having more wage earners on average.³⁶ Undocumented workers earn even less, making households that rely on their income even more vulnerable to housing cost burden. With lower incomes and less access to public assistance, immigrant households are at greater risk.

The median earnings of undocumented New Yorkers are \$29,000, compared to \$49,000 for U.S.-born workers.³⁷

With a few exceptions, immigrants in the U.S. who are not naturalized citizens, refugees/asylees, or Lawfully Permanent Residents (“green card” holders) are not eligible to receive federally funded housing cost assistance.³⁸ These restrictions exclude thousands of New Yorkers, including an estimated 504,000 undocumented residents,³⁹ from some of the City’s most critical affordable housing resources, including public housing, Section 8 rental subsidy, and low-income units constructed using federal funding.⁴⁰ Residents who are not qualified to access these resources, yet whose children are U.S. citizens, can in some cases obtain partial benefits for their households.⁴¹ However, partial assistance may not be enough to keep families afloat. Meanwhile, recent federal policy reforms have diminished options for partial assistance and created fear and confusion that can prevent non-citizens from claiming the help to which they are entitled.

Over 1 in 8 New Yorkers live in mixed-status households.

Exclusion from housing assistance creates an additional layer of vulnerability for thousands of low-income, immigrant New Yorkers. Many households end up living in overcrowded apartments shared by multiple families, or in informal housing arrangements, which create the potential for unsafe living conditions and deprive occupants of tenant

rights. For single, very low-income immigrant New Yorkers, these arrangements can also entail sharing small rooms with strangers and sharing beds by sleeping in shifts.⁴²

Of the 260,000 children living in NYC’s mixed-status households, 80% are U.S.-born citizens and 65% live in rent-burdened households.

Meanwhile, the children of New Yorkers ineligible for assistance also suffer the negative impacts of housing cost burden, housing instability, and increased risk of homelessness, despite the fact that many of them are U.S. citizens. Nearly one million, or more than 1 in 8 New Yorkers, live in mixed-status households containing at least one undocumented member. This includes over 260,000 children, 80% of whom are U.S.-born citizens and 65% of whom live in rent-burdened households.⁴³

KEY OBJECTIVES:

- **Provide non-federally funded rental assistance that is accessible to all New Yorkers, regardless of immigration status.**
- **Strengthen and clarify rules around City agencies’ cooperation with federal immigration authorities.**

ELIMINATE DISPARITIES IN ACCESS TO THE CITY'S HOUSING LOTTERIES & AFFORDABLE HOUSING STOCK.

1.4

The development of subsidized, below-market rental housing is a core pillar of New York City's housing policy, yet fails to benefit many immigrant households. Units are rented out through a lottery system that randomly selects from a pool of pre-eligible applicants. The odds of winning the affordable housing lottery are incredibly slim, with over 25 million applications received for only 40,000 units since 2013.⁴⁴ Meanwhile, winning does not guarantee housing. If selected, applicants must successfully complete several other steps in a process involving the submission of tax documents, proof of employment, and other materials to verify income eligibility, as well as in-person interviews with a marketing agent.

Many immigrant New Yorkers are unable to participate in the housing lottery, and those who can enter are at a disadvantage within this highly competitive process. Immigrant households are often ineligible for lottery housing because their incomes are too low.⁴⁵ Households including one or more undocumented members are unable to compete for any housing units that are federally subsidized.⁴⁶ LEP residents and those unfamiliar with New York City government may be unaware of the housing lottery altogether or unable to navigate the application process on their own. New Yorkers who have not filed taxes in the U.S., rely on informal sources of income, and/or work in cash-based economies, may lack the required forms of proof to verify their income. Others may be unwilling to submit the required documentation if it includes information related to their immigration status.

New York City recently eliminated credit checks and Social Security Numbers from the application requirements for its affordable housing lotteries, allowing undocumented New Yorkers to compete for housing for the first time.⁴⁷ This is a crucial step towards providing equitable access to the affordable housing stock, yet in practice, many immigrant households remain excluded.

KEY OBJECTIVES:

- **Use housing lottery data to better understand housing preferences and needs, and strategically allocate resources for affordable housing development.**
- **Streamline the process of verifying household income and eligibility for affordable units, and expand options to allow households to use alternative forms of proof.**
- **Create housing lottery preferences to prioritize affordable housing for underserved communities and essential workers.**

INCENTIVIZE AFFORDABLE HOUSING DEVELOPMENT IN IMMIGRANT COMMUNITIES WITH ACCESS TO JOBS, TRANSIT, & INFRASTRUCTURE CAPACITY.

1.5

Zoning and land use policy are crucial tools in shaping the growth and development of New York City to advance policy goals. Zoning can be leveraged to encourage or limit different types of development in different neighborhoods, depending on market conditions and community needs.

By upzoning neighborhoods that are suitable to accommodate more housing and removing outdated or exclusionary zoning, we can provide more housing opportunities for underserved communities and increase housing mobility. As discussed in the draft plan from *Where We Live*, the City's initiative to affirmatively further fair housing goals, eliminating unnecessary barriers to affordable housing creation in zoning is a key strategy for equitable development.⁴⁸ In neighborhoods where market forces are threatening the livelihood of communities, zoning can be applied to mitigate risk and protect vulnerable households.

To increase access to housing for immigrant New Yorkers, we should leverage zoning to encourage more affordable housing development in neighborhoods with large and/or growing immigrant populations, good access to jobs and transit, and the infrastructure capacity to serve additional residents. More housing stock can alleviate household overcrowding and reduce reliance on informal housing arrangements. Meanwhile, newly arrived immigrants can benefit from more housing options in neighborhoods where other residents have similar linguistic and cultural backgrounds. Many new migrants rely on living in such a community to find housing, gain employment, access services, and secure their livelihood.⁴⁹

KEY OBJECTIVES:

- **Encourage affordable housing development in areas with growing immigrant populations, access to jobs and transit.**
- **Prioritize neighborhoods most affected by household overcrowding and informal housing arrangements.**
- **Plan for capital improvements in areas with limited**

- **infrastructure capacity to accommodate future growth.**
- **Remove onerous barriers in zoning that limit the development potential of underserved neighborhoods.**

FORM PARTNERSHIPS TO EVALUATE THE HOUSING NEEDS OF IMMIGRANT COMMUNITIES.

2.1

The needs of immigrant New Yorkers are not always well captured within the demographic data sources used to inform policy. These sources provide limited information about undocumented New Yorkers and occupants of informal housing, among other vulnerable groups. Meanwhile, data cannot always explain the relationship between community needs and their housing conditions. Immigrant-headed households are disproportionately impacted by overcrowding, yet some may experience overcrowding due to financial constraints, while for others, the housing stock's lack of options for multi-generational households could be the cause.

The City should leverage the knowledge and expertise of its community partners to better understand and address the housing needs of immigrant New Yorkers. Community-based organizations and non-profit service providers are a core pillar of New York City's civic infrastructure. They often possess a greater degree of cultural competency and understanding of the unique needs and experiences of

the communities they serve. Given the vast cultural, ethnic, and linguistic diversity of the foreign-born population, these organizations are particularly important to the health and well-being of immigrant New Yorkers.

Entities that work directly with immigrant New Yorkers on a daily basis have valuable, on-the-ground insight into the housing needs of the communities they serve. Community organizations can also help improve data by acting as a buffer between households and City agencies, ensuring anonymity and a level of trust that may allow residents to feel more comfortable providing information. Formalizing partnerships and structures to deepen our understanding of the needs of immigrant New Yorkers is especially important at this time. Recent federal actions have made some immigrant New Yorkers more reluctant to provide personal and household information to government entities. This dynamic threatens the accuracy of key sources of demographic data, such as the Census and the Housing & Vacancy Survey, and could diminish the long-term ability of policymakers to understand and address the needs of immigrant communities.

KEY OBJECTIVES:

- **Develop partnerships and establish systems to periodically evaluate the housing conditions and needs of immigrant communities.**
- **Establish ongoing strategies with community partners to cultivate insight into the needs of marginalized groups, such as undocumented New Yorkers.**
- **Integrate findings from MOIA’s “State of Our Immigrant City” annual report into the work of all City agencies.**

PLAN TO MEET THE HOUSING NEEDS OF A CHANGING POPULATION.

With better data and understanding around the needs of immigrant communities, we can more effectively plan for a changing population. New York’s foreign-born population is constantly in flux, with migration trends both reacting to and influencing community needs. In the past ten years alone, many prominent immigrant groups have changed significantly in terms of size and growth rate (see Table 3). The Haitian- and Jamaican-born populations have been shrinking. Meanwhile, the Bangladeshi-born community has nearly doubled in size, with the addition of 46,000 residents since 2008. Although Indian- and Columbian-born New Yorkers were decreasing in number ten years ago, each of these groups has seen resurgent growth in the last five years.

A deeper understanding of immigration trends can help us prepare to meet the burgeoning needs of communities that are growing, and prevent the loss of those that are threatened.

KEY OBJECTIVES:

- **Partner with DCP & MOIA to establish a system for monitoring immigration trends, periodically reporting on key findings, and disseminating findings to other City agencies.**

**Table 3:
Migration Trends of 10 Largest
Foreign-Born Populations in NYC
by Place of Birth, 2008-2018⁵⁰**

Place of Birth	% of All Foreign-Born	Average Year of Entry	# Change 2008-2018	% Change 2008-2013	% Change 2013-2018	Total % Change 2008-2018
Dominican Republic	13.7%	1997	78,600	24%	-1%	22%
China	12.7%	1998	74,169	15%	11%	28%
Mexico	5.3%	2000	-10,600	6%	-12%	-6%
Jamaica	5%	1993	-23,900	-3%	-11%	-13%
Guyana	4.3%	1995	-15,000	-10%	-1%	-10%
Ecuador	3.8%	1996	-22,000	-4%	-12%	-16%
Bangladesh	3.2%	2004	44,300	44%	27%	83%
Haiti	2.6%	1992	-11,400	-8%	-5%	-12%
India	2.6%	1995	7,900	-4%	16%	11%
Colombia	2.3%	1996	1,400	-7%	10%	2%
All Immigrant NYers	N/A	1996	48,315	2%	-1%	2%

ENABLE AND INCENTIVIZE BASEMENT APARTMENT CONVERSIONS. **2.3**

Basement apartments are a critical supplement to the city's housing stock, creating affordable rental housing supply without the cost of acquiring land and providing homeowners with a source of revenue to help pay their mortgage or property maintenance costs. Basement apartments provide housing options and financial stability to underserved groups such as new immigrants, elderly residents aging in place, and multi-generational households. Yet basement apartment conversions involve a complex web of financial and regulatory hurdles that make them difficult and often impossible for homeowners. Most of the city's basement apartments exist within the informal housing market as a result, creating the potential for unsafe living conditions and depriving both occupants and homeowners of leasehold rights.

Most of the city's basement apartments exist within the informal housing market, creating the potential for unsafe living conditions and depriving occupants and homeowners of leasehold rights.

We urgently need to provide a streamlined pathway allowing homeowners to feasibly convert their basements into safe, legal apartments. Many immigrant homeowners would benefit from having an additional unit that they could rent out to earn extra income, or use as additional

living space for friends and family members. For immigrant seniors aging in place, an extra unit could allow for a live-in caretaker. Plenty of homeowners already make use of their basements in these ways, but without legally converting them into apartments beforehand. As long as these housing arrangements are kept under the radar, the health, safety, and security of basement tenants and homeowners are in jeopardy.

Regulatory reform could allow for the conversion of tens of thousands of basements and cellars across New York City into safe, legal apartments.

Enabling more basement conversions would provide safety and stability to basement occupants and homeowners, expand housing options for new immigrants and other underserved groups, and unlock a critical source of affordable housing supply. An estimated 10,000 to 38,000 basement units could be brought into safe and legal use without any zoning changes.⁵¹ With zoning and cellar conversions also in play, tens of thousands more apartments could be created.

KEY OBJECTIVES:

- **Enact regulatory reform to reduce the administrative and financial barriers to basement apartment conversions.**
- **Incentivize homeowners to undertake conversions to expand affordable housing options and promote homeownership in immigrant communities.**

IMPLEMENT NEW STRATEGIES AND SYSTEMS FOR EQUITABLE CODE ENFORCEMENT. **2.4**

Enforcement of the housing and building codes is our primary tool for keeping the housing stock and built environment safe and healthy for everyone. Code enforcement is an essential City function and has the power to protect renters from substandard housing conditions, educate homeowners, improve health outcomes, and revitalize neighborhoods. Yet code compliance is not a policy goal in itself, and the goal of enforcing the code should be to keep communities safe and healthy, rather than to achieve compliance for its own sake.

Too often, code enforcement ends up working against our other housing policy goals by thwarting the creation or preservation of affordable housing, destabilizing neighborhoods, and/or disproportionately penalizing and displacing vulnerable populations. The city's codes and regulations address a vast range of issues that vary widely in scale and severity of risk. Our current system relies too much on the blanket application of aggressive enforcement strategies focused on punitive action.⁵² Without tools to weigh the risk posed by a violation against its context and our other goals, code enforcement can penalize low-income New Yorkers, immigrant communities, and communities of color for living in neighborhoods where the housing stock has suffered from the legacy impacts of disinvestment.⁵³

The current system is moreover driven by responding to complaints, which favors residents who are comfortable filing complaints and marginalizes those who are not, such as LEP New Yorkers and residents who are uncomfortable interacting with government and law enforcement. This dynamic has allowed for complaint calls and violation reporting to be weaponized against vulnerable communities in gentrifying neighborhoods. Several recent analyses of 311 call data have confirmed that complaints occur more frequently in the “contested boundaries” between two or more ethnically homogenous neighborhoods, and in low-income neighborhoods of color experiencing an influx of White residents.⁵⁴ One study found that 32% of posts in an online forum with the keyword “neighbor” and “noise” explicitly mentioned the accused offender’s race or ethnicity.⁵⁵

Several analyses of 311 call data have found that complaints about neighbors are more frequent in gentrifying neighborhoods.

The weaponization of 311 causes code enforcement to further marginalize communities. Receiving a violation can deliver destabilizing consequences, even if the respondent was previously unaware of the issue or if it does not pose an immediate risk. Fines and penalties to low-income homeowners make it even more difficult for them to afford the necessary repairs. Reports of informal housing units or non-compliant sharing can leave undocumented and other vulnerable New Yorkers without housing.

We need to shift code enforcement from a punitive, reactive framework to one that is proactive, goal-oriented, and centered around equity. We must implement new strategies, tools, and metrics for keeping the built environment healthy and safe without disproportionately penalizing vulnerable communities or working against our other policy goals. With a new, more equitable system in place, New York can harness the power of code enforcement to advance myriad policy goals and maximize benefits for underserved neighborhoods.

KEY OBJECTIVES:

- **Develop a framework to strategically and equitably deploy enforcement resources.**
- **Create alternative tools to resolve code violations that are suited to the respondent and commensurate to the risk.**
- **Implement new strategies for homeowner education and neighborhood revitalization.**
- **Reduce reliance on reactive enforcement methods and develop practices for goal-oriented, proactive enforcement.**

ALLEVIATE OVERCROWDING BY PROVIDING DEEPLY AFFORDABLE HOUSING FOR NEW, UNDOCUMENTED, & OLDER IMMIGRANTS.

Like in most of the U.S., the majority of the housing stock in New York City is designed to accommodate nuclear family households consisting of a married couple with children. Yet this model is very different from how most New Yorkers actually live. In 2018, only 1 in 4 households were comprised of parents and their children, and a third of those were single-parent households.⁵⁶

New York City faces a severe shortage of affordable housing options for single-person households, which account for 32% of the city's households.⁵⁷ Another 8% are comprised of unrelated adults sharing a home,⁵⁸ an arrangement that results for many out of financial necessity due to the lack of affordable studio and one-bedroom apartments. While immigrant New Yorkers are less likely to live alone than U.S.-born residents, those sharing an apartment with roommates or extended family are far more likely to live in overcrowded conditions, indicating the higher barriers to affording a studio or one-bedroom apartment, rather than a lower level of demand for those types of housing.

1 in 3 foreign-born, single adults sharing an apartment with roommates lives in an overcrowded unit.⁵⁹

To reduce overcrowding in immigrant households, we need to make studios and one-bedroom apartments more affordable and accessible to immigrant New Yorkers by better meeting demand. Relaxing parking requirements and density restrictions in zoning can advance this goal by enabling and incentivizing the development of more studio and one-bedroom apartments.

Meanwhile, alternative housing typologies should be explored as a source of supplemental housing supply, especially for groups that are vulnerable to overcrowded living conditions. In recent years, interest has grown around single-room occupancy (SRO) housing typologies as a potential solution. SROs, in which private bedrooms are rented out at a lesser cost in exchange for shared bathroom and kitchen facilities, have been effectively banned for decades. However, the concept is once again being raised in policy discussions, as the shortage of affordable options for single-person households has become increasingly intense.⁶⁰

When designed and managed well, SROs and other shared housing typologies can provide many benefits, including increased housing options for underserved communities such as undocumented New Yorkers, new immigrants, and seniors living alone. New immigrants and undocumented residents often lack the savings, financial documentation, and credit history necessary to sign a lease. Undocumented New Yorkers are subject to experiencing particularly high financial barriers, due to their very low earnings and acute vulnerability to workplace violations such as non-payment of wages and illegal deductions.⁶¹ Compared to traditional studios and one-bedrooms, SROs can offer more affordable rents and extra flexibility for short-term

arrangements, increasing accessibility for people unable to qualify for a standard lease, while maintaining a low level of risk for landlords.

Immigrant seniors are the fastest-growing population in NYC, far outpacing older, U.S.-born residents.

SROs and shared housing can also help meet the growing need for deeply affordable housing for seniors living alone. Immigrant seniors are the fastest-growing population in the city, far outpacing older residents born in the U.S., and will soon account for the majority of New Yorkers aged 65 and older.⁶² As a result of this shift, more public resources and support will be needed to care for the aging population. Older, foreign-born New Yorkers are 1.5x as likely as those born in the U.S. to be poor, receive far fewer public benefits from programs like Social Security and Medicare, and have significantly less in retirement savings.⁶³ In 2018, older, foreign-born New Yorkers living alone had a median income of just \$14,700, or 42% less than their U.S.-born counterparts.⁶⁴

In 2018, older, immigrant New Yorkers living alone had a median income of just \$14,700 – 42% less than those born in the U.S.

A CLOSER LOOK:

THE WEAPONIZATION OF 311

While a data-driven enforcement system seems fair at first glance, 311 cannot control for biases driving neighborly complaints, allowing it to become weaponized against vulnerable communities.

Three recent examples demonstrate how this occurs:

- A shelter in Queens serving predominantly elderly residents has been the subject of numerous 311 complaints. One complaint accused the shelter of illegally hiring “undocumented” workers on the property, although it is unclear how the caller would have information about workers’ immigration status.
- Following the outbreak of COVID-19, Bay Ridge residents began seeing racist flyers warning that Chinese New Yorkers are “ruining” the neighborhood with illegal home conversions that are pushing out “middle-class” (implied, non-Chinese) homeowners. Reporting an illegal conversion can be a tactic for penalizing a neighbor with extra government scrutiny. While illegal conversions can create the potential for unsafe living conditions, enforcement should not embolden the discriminatory impulses of neighbors.
- In the online forum at City-Data.com, posts about noise complaints frequently use racist language to describe the accused offenders. Some posts describe strategies for ensuring that offenders will be penalized, such as repeatedly calling 311 and the police, and exaggerating one’s account of the accused offender’s behavior.

“...CONSTRUCTION AT THIS LOCATION WHICH IS BEING DONE WITHOUT PERMITS AND BY **UNDOCUMENTED WORKERS...**”

Neighborly complaint
call to 311

“...CHINESE ARE DESTROYING BAY RIDGE: **ILLEGAL HOME CONVERSIONS - RUINING HOUSING STOCK... JUNK STORES... DIRTY CHINESE RESTAURANTS...**”

Flyers posted anonymously
on lamp posts in Bay Ridge,
Brooklyn

“...SUBJECTED TO **LOUD RAP**
FOR HOURS TODAY... CALLED THE POLICE,
311 & PRECINCT NUMEROUS TIMES...”

Post in the NYC forum at
City-Data.com

KEY OBJECTIVES:

- **Implement regulatory reform to enable and encourage the development of SROs and shared housing typologies, while ensuring good design and management.**
- **Strengthen measures to prevent the displacement of occupants of existing, illegal SROs, and incentivize landlords to bring those properties up to code.**
- **Reform density and parking restrictions that prevent the creation of studio and one-bedroom apartments.**

ENCOURAGE INNOVATIVE HOUSING DESIGN & DEVELOPMENT TO SERVE MULTI-GENERATIONAL HOUSEHOLDS.

Rising housing costs, a growing senior population, and social support benefits have contributed to a growth in multi-generational households nationwide.⁶⁵ In New York City, immigrant communities are disproportionately impacted by the limitations of a housing stock designed for nuclear families. Of households headed by U.S.-born residents, only 3% are multi-generational, and 1 in 8 include adult relatives living together. By comparison, 8% of immigrant-headed households are multi-generational, and 1 in 4 include adult relatives sharing a home.⁶⁶

65% of NYC's multi-generational households are headed by immigrant New Yorkers.

Typical and preferred living arrangements vary drastically across the globe, and the ethnic and cultural backgrounds of foreign-born New Yorkers impact how they live in the city. Immigrant households are also more likely to face economic constraints that can make multi-generational living more financially feasible. Meanwhile, multi-generational households may arise when newcomers to the U.S. join family members already established in the city. Compared to the 1990s, immigrant New Yorkers who entered the country between 2000 and 2013 were more likely to use visas for the immediate relatives of U.S. citizens (as opposed to other types of visas), with 21% more visas issued to the children of citizens and 44% more to their parents.⁶⁷

Immigrant New Yorkers arriving from 2000-2013 were far more likely to use visas for the immediate family of U.S. citizens than in the 1990's.

Until the city's housing stock reflects the diverse household arrangements of its population, the housing needs of immigrant communities will remain insufficiently met. Moreover, foreign-born New Yorkers will continue to be disproportionately vulnerable during times of crisis. The harmful consequences of the mismatch between our housing stock and New Yorkers' housing needs are underscored by COVID-19, as overcrowded living conditions could increase the risk of exposure. 39% of multigenerational, immigrant-headed households are weathering the COVID-19 pandemic in overcrowded units.⁶⁸

39% of multi-generational households headed by immigrant New Yorkers are overcrowded.

Meanwhile, the rapidly growing number of immigrant seniors is likely to increase the need for multi-generational housing even more in the years ahead. Bringing public services up to speed to support an aging population of unprecedented diversity is a crucial priority.⁶⁹ Yet we also need to prepare for more and more senior residents to turn to their families for care and support, including by providing housing that helps, rather than hinders, multi-generational living arrangements. As extended family members can help with childcare and other household responsibilities, creating more housing for multi-generational households is also an important measure to support working parents and low-income families.

New York City is home to a robust affordable housing industry that has been a leader in countless innovations in housing design and development. With the resources and expertise of the housing industry, alongside the extensive knowledge of community needs brought to the table by community-based organizations and service providers, New York can lead the way in creating new housing typologies to meet the needs of multi-generational households.

KEY OBJECTIVES:

- **Develop and issue an RFEI for the design and development of innovative housing typologies to serve multi-generational households.**
- **Partner with CBOs and housing providers to gather and incorporate feedback and input from New Yorkers who live in intergenerational homes.**

EXPAND DOWN PAYMENT ASSISTANCE.

3.1

Homeownership has been a crucial tool for immigrant New Yorkers to secure their livelihood in the U.S, providing a pathway to wealth creation that can in turn bolster the success of future generations. New York City has also reaped ample benefits from immigrant homeownership, which held rebuild the municipal tax base, reoccupy vacant housing stock, and revitalize neighborhoods in decline after the 1970s fiscal crisis.⁷⁰ Between 1990 and 2002, immigrant New Yorkers accounted for the recent occupancy of at least 70% of the housing stock in many parts of Queens, laying the groundwork for the bustling ethnic enclaves the borough is known for today.⁷¹

Today, immigrant-headed households are only marginally less likely overall to own their homes than U.S.-born New Yorkers, and in some areas of the city have higher rates of homeownership.⁷² However, younger and newer immigrants have less access to this opportunity than prior generations. In the decade following the 2008 Financial Crisis, the supply of modestly priced homes for sale in New York City shrunk, rising housing costs outpaced stagnating wages, and credit standards tightened.⁷³ In recent years, home seekers relying on traditional mortgage financing have also faced growing competition from investors equipped to clinch quick purchases made entirely in cash.⁷⁴

With lower incomes than their U.S.-born neighbors, immigrant New Yorkers are at an even greater disadvantage. Restoring access to homeownership among immigrant communities that have historically leveraged its benefits is crucial. Although

the 2008 market crash had devastating impacts on many low- and moderate-income households, numerous studies have confirmed the favorable wealth outcomes of those that maintained homeownership throughout the crisis.⁷⁵

Promoting homeownership for low- and moderate-income households can also direct its benefits into more immigrant communities. While homeownership is more prevalent in some foreign-born groups than it is among U.S.-born New Yorkers, other groups have extremely low homeownership rates. Cultural preferences and backgrounds play an important role in this variation, as some immigrant communities place a higher priority on homeownership, while others tend to prioritize educational or business investments.⁷⁶ Yet some groups face financial barriers that restrict access to any such options. Out of the 10 largest immigrant communities in New York City, the two with the lowest median household incomes, Dominican- and Mexican-born New Yorkers, also have the lowest rates of homeownership (see Table 4).

Over two-thirds of American renters view affording the down payment as a barrier to purchasing a home.⁷⁷

Expanding down payment assistance is a crucial first step towards helping more low- and moderate-income New Yorkers become homeowners. Down payment assistance programs are widely viewed as highly effective and low-risk, as studies have found no effect on recipients' loan performance.⁷⁸ Down payments are perceived as a leading barrier to homeownership, with the great majority

of American renters finding them difficult to save for.⁷⁹ Assistance programs can empower households to achieve homeownership that would otherwise not be able to.⁸⁰

A 20% down payment on the median home price in NYC would require \$136,000 in cash,⁸¹ or nearly 4 years' worth the median earnings of immigrant New Yorkers.

In New York City, where saving for a 20% down payment on the median home price takes around 10 years longer than elsewhere in the U.S.⁸², down payment assistance must be a core pillar of support to promote low- and moderate-income homeownership. The recent expansion of the City's Home First program to offer eligible buyers up to \$40,000 in down payment assistance was a crucial step. Yet the high cost of housing requires that we find new ways of providing assistance in greater amounts, and allocate additional resources to support more households. As advocates have pointed out, we can draw lessons from other U.S. cities like San Francisco, which offers up to \$200,000 in the form of repayable, zero-interest loans.⁸³

For expanded down payment assistance to benefit the success and stability of immigrant New Yorkers, resources must be accompanied by outreach and education initiatives to help lower-income immigrant communities gain access to them.

Table 4:
Median Household Income & Homeownership Rates
of 5 Largest Foreign-Born Groups in NYC (2018)⁸⁴

Place of Birth (HH Head)	# of Households in NYC	Median Household Income	% Homeowners
Dominican Republic	191,757	\$35,000	9%
China	137,155	\$46,000	46%
Mexico	62,232	\$45,000	5%
Jamaica	75,169	\$63,000	41%
Guyana	56,044	\$70,000	55%
All Immigrant NYers	1,390,245	\$64,000	33%

KEY OBJECTIVES:

- **Explore new sources of funding and allocate additional resources towards down payment assistance.**
- **Implement innovative program models that can offer down payment assistance in greater amounts to a wider range of households.**
- **Launch new initiatives and partnerships focused on equipping low-income, immigrant households with information about homeownership and down payment assistance, and helping them work towards program eligibility.**

IMPROVE ACCESS TO HOME MORTGAGES FOR IMMIGRANT NEW YORKERS.

In addition to the financial constraints experienced by most low- and moderate-income households, foreign-born home seekers often face barriers to mortgage eligibility related to financial integration and credit. Lack of credit is one of the leading obstacles to homeownership for immigrant New Yorkers, preventing many households that would otherwise do so from qualifying for a mortgage.⁸⁵

Credit is a difficult issue for individuals born outside the U.S. for many reasons. Entering the country with little to no credit history, immigrant Americans are often categorized by mainstream financial institutions as risky borrowers, depriving them of access to prime rate loans and credit cards that would otherwise serve as key starting points for building a credit profile.⁸⁶

Meanwhile, barriers to financial integration can make it difficult to reach a position in which credit is attainable. Language barriers, unfamiliarity with or distrust of the U.S. banking system, high fees associated with maintaining bank accounts, and employment in cash-based economies are among the myriad factors that can deter foreign-born New Yorkers from becoming banked in the U.S. and entering the financial mainstream.⁸⁷ Immigrant New Yorkers may chose to instead save and accumulate capital through family and noninstitutional networks, preventing their financial activity from contributing to a formal credit history.⁸⁸

Addressing these converging issues requires a two-pronged approach. First, New York should expand and increase access to loan products with flexible underwriting criteria. For example, Fannie Mae's HomeReady Mortgage allows for family member contributions towards the down payment, and utilizes underwriting criteria specifically designed to accommodate first-time homebuyers that are demonstrably credit-worthy, yet have thin credit profiles. New York State's Conventional Plus program combines the flexibility of the HomeReady product with a down payment assistance loan to make homeownership attainable for a wider range of low-income households.⁸⁹

Second, we need to ramp up efforts to help foreign-born residents become banked and begin building credit. Outreach and education on the how and why of financial integration can help more individuals lay the groundwork for homeownership in the future. Collaboration with local financial institutions can highlight gaps in the banking system where foreign-born New Yorkers need additional support and flexibility, and inform solutions.

KEY OBJECTIVES:

- **Scale up outreach & education to immigrant households around safe, accessible loan products and programs like NYS' Conventional Plus.**
- **Explore opportunities to replicate successful program models at the local level.**
- **Partner with CBOs & service providers to promote education and awareness around financial integration.**
- **Engage with local banks & credit unions to study and overcome obstacles in the banking process for foreign-born consumers.**

LEVERAGE ZONING TO PROMOTE ENTREPRENEURSHIP & SMALL BUSINESS DEVELOPMENT.

3.3

Immigrant New Yorkers have a long history of leveraging entrepreneurship to achieve financial stability and success. As a result, immigrant-owned businesses play a vital role in the citywide economy, serving as neighborhood anchors that meet communities' essential retail and service needs. Over half of the city's small businesses are owned by foreign-born New Yorkers,⁹⁰ who also account for 43% of retail workers and 58% of food service employees.⁹¹

Immigrant New Yorkers own over half of the city's small businesses and account for 43% of retail workers and 58% of food service employees.

Despite the benefits that small businesses can provide, the risk and costs associated with launching and maintaining them can be prohibitively expensive, especially for low-income New Yorkers. Obtaining and preparing a retail space can require a significant amount of capital and resources up front, and keeping up with costly commercial rents poses an ongoing challenge to many small business owners. For immigrant New Yorkers, these obstacles are often compounded by issues such as language barriers, lack of access to City resources, landlord harassment, or fears around personal immigration status.⁹²

In a 2019 survey of immigrant-owned small business owners, 77% of respondents reported being overburdened by their commercial rent.⁹³

The New York City Zoning Resolution places clear restrictions on how and where space can be used for residential, versus commercial purposes. Yet with the growth of technology, the lines between where we live and where we work have been blurring for years, and those changes are now being expedited by COVID-19. Although current zoning rules offer few allowances for commercial activities to occur in residential units, the COVID-19 pandemic has required millions of New Yorkers to work from home for several months. Activities that are explicitly prohibited in zoning, such as operating real estate or public relations out of a bedroom, have become commonplace. Moreover, many global, office-based companies intend to allow their staff to continue working from home indefinitely, even after the pandemic has subsided.⁹⁴

New York will need to update its zoning to reflect these new circumstances. When we do, we must also include reforms to address the outsized hardships being shouldered by business owners and workers outside the office setting. Thousands of small businesses owners, many of them foreign-born, are suffering from months of lost revenue. Several major industries that have been hit the hardest by job loss from COVID-19 employ workers that are between 60% and 80% foreign-born. According to one estimate by the Center for NYC Affairs, undocumented workers have lost or will lose their jobs to this pandemic at twice the rate of private sector employees overall.⁹⁵

In the restaurant and hotel sector, which has lost over 251,000 jobs to COVID-19, 63% of workers are immigrants.⁹⁶

Updating onerous and outdated aspects of zoning, including the classification of commercial uses, could aid New York's economic recovery by making it easier to reinvest in vacant retail spaces and to provide the services that communities want and need.⁹⁷ Zoning can also be used to protect the livelihood and occupations of immigrant New Yorkers in the same way that it once helped artists afford housing in a burgeoning arts community. Since the 1980s, the Joint Live-Work Quarters for Artists (JLWQA) provision has allowed certified artists to live and work out of singular units in SoHo/NoHo, an area that is otherwise zoned for manufacturing uses.⁹⁸ In this time of undue financial hardship, we must extend the same innovative reach to support struggling small businesses, lower the barriers to small business ownership, and preserve culturally specific neighborhood retail and services.

KEY OBJECTIVES:

- **Ease restrictions around commercial activities in residential spaces to allow more immigrant entrepreneurs and small business owners to launch and operate commercial ventures from home.**
- **Provide affordable commercial spaces in the ground floors of mixed-use affordable housing developments and reserve spaces in designated quantities and/or neighborhoods for immigrant-owned and/or M/WBE small businesses.**
- **Build on Community District Needs Assessments and conduct community outreach to explore options for a Cultural Retail Special District designation.**

ENCOURAGE EMPLOYER-ASSISTED HOUSING PROGRAMS THAT BUILD OPPORTUNITY FOR IMMIGRANT WORKERS.

3.4

In cities across the globe, employers are undertaking new initiatives for employer-assisted housing (EAH). Starbucks is subsidizing the rental payments of 9,000 store employees in cities across China, while operating a program in the UK that provides interest-free loans for young workers to pay their rental deposits.⁹⁹ Audible is providing a rental subsidy to staff at its Newark offices who are willing to relocate there from New York City.¹⁰⁰ Meanwhile, software investment company Addepar is offering a monthly housing stipend for employees who live within close proximity of its New York City and Silicon Valley offices.¹⁰¹

Historically, EAH programs have been more commonly administered by local governments or anchor institutions and focused on down payment assistance paired with homeowner education.¹⁰² In New York City, EAH has more often consisted of homeownership opportunities for highly sought-after workers or rental housing developed by corporations for their workforce. Today, with more and more businesses providing rental assistance, new forms of EAH are taking off in the global corporate economy.

From a business perspective, EAH programs can help reduce long commute times that are shown to negatively impact worker productivity, reduce costly turnover rates, and improve staff recruitment and retention. They can also

advance policy and planning goals by revitalizing and stabilizing neighborhoods, while increasing housing mobility and homeownership opportunities for low- and moderate-income households. However, good design, management, and oversight are necessary to ensure that EAH programs are truly benefiting low-income households, and to prevent neighborhood stabilization from turning into gentrification.¹⁰³

With more and more companies independently pursuing new forms of EAH, policymakers need to ensure that these programs are benefiting communities that lack equitable access to housing and employment. In addition to being disproportionately housing cost-burdened, immigrant New Yorkers have lower levels of educational attainment than their U.S.-born neighbors and may face language barriers that limit access to jobs and education. Meanwhile, those with higher levels of education and work experience may face difficulties utilizing their credentials in the U.S.¹⁰⁴

Many immigrant New Yorkers have limited access to job opportunities due to lower levels of educational attainment and/or language barriers.

Providing occupational skills training, adult education, and entry into career-track jobs for immigrant New Yorkers, along with combating underemployment and “brain waste,” are key policy goals to support the future of the citywide economy and workforce.¹⁰⁵ New York should

explore partnerships and policy measures to advance these goals by shaping private-sector EAH, such as by requiring companies to pair programs with workforce development, enact preferences for qualified New Yorkers from underserved communities, or partner with community-based skills-training organizations to recruit entry-level employees and EAH program participants.

In recent years, New York has been struggling to navigate the equity implications of economic development opportunities such as the proposed Amazon headquarters in Long Island City. To ensure that the city can attract and retain the large-scale employers that it desperately needs, we must come up with new strategies to ensure that immigrant New Yorkers and other underserved communities share in the benefits that these opportunities have to offer. Requiring corporate entities and large-scale employers to offer housing assistance for low-wage employees, coupled with workforce development and career pathway opportunities, could be a key part of the solution to this puzzle.

Immigrant workers account for the majority of NYC’s janitors, building cleaners, nurse aides, & food prep workers,¹⁰⁶ among many other occupations that are essential to university and hospital operations, yet tend to earn far less than other positions at anchor institutions.

New York should also encourage its wealth of anchor institutions to provide or expand existing EAH initiatives, with program guidelines and oversight to ensure that assistance is reaching the employees who need it the most. Immigrant workers account for the majority of New York’s janitors, building cleaners, nurse aides, food preparation workers, and many other occupations that are essential to university and hospital operations, yet tend to earn far less than other positions at anchor institutions. EAH can be leveraged to help low-wage employees benefit from reduced commute times and the abundance of services and amenities that typically surround anchor institutions.

KEY OBJECTIVES:

- **Work with anchor institutions that provide EAH to ensure that low-wage employees also benefit from assistance programs and opportunities.**
- **Require corporate entities administering EAH to pair their initiatives with housing assistance, workforce development, and career pathway opportunities for underserved communities.**

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HOUSING PLAN FOR A CITY OF IMMIGRANTS



PROMOTE EQUITABLE ACCESS TO HOUSING, UNRESTRICTED BY NATIONALITY OR LEGAL STATUS.

1

- 1.1** Expand and streamline language translation, interpretation, & navigation services and resources.
- 1.2** Strengthen measures to combat housing discrimination, community outreach & education.
- 1.3** Provide universally accessible rental assistance.
- 1.4** Eliminate disparities in access to the City's housing lotteries & affordable housing stock.
- 1.5** Incentivize the creation of affordable housing in immigrant communities with access to jobs, transit, & infrastructure capacity.

PROVIDE FLEXIBLE AND DIVERSE HOUSING OPTIONS TO BETTER MEET THE NEEDS OF IMMIGRANT NEW YORKERS.

2

- 2.1** Form partnerships to evaluate the housing needs of immigrant communities.
- 2.2** Plan to meet the housing needs of a changing population.
- 2.3** Enable and incentivize basement apartment conversions.
- 2.4** Implement new strategies and systems for equitable code enforcement.
- 2.5** Alleviate overcrowding by providing deeply affordable housing for new, undocumented, & older immigrants.
- 2.6** Encourage innovative housing design & development to serve multi-generational households.

LEVERAGE HOUSING POLICY TO CREATE ECONOMIC OPPORTUNITIES SO THAT IMMIGRANT COMMUNITIES CAN THRIVE.

3

- 3.1** Expand City down payment assistance.
- 3.2** Improve access to home mortgages for immigrant New Yorkers.
- 3.3** Leverage zoning to promote entrepreneurship & small business development.
- 3.4** Encourage employer-assisted housing programs that build opportunity for immigrant workers.



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