



**TESTIMONY SUBMITTED TO THE NEW YORK STATE ASSEMBLY
COMMITTEES ON HOUSING, SOCIAL SERVICES, & WAYS AND MEANS
CITIZENS HOUSING AND PLANNING COUNCIL
KATHERINE LEITCH, SENIOR POLICY ANALYST
AUGUST 10, 2021**

Chairpersons Cymbrowitz, Rosenthal, and Weinstein, and esteemed Assembly members:

Thank you for the opportunity to submit comments on the implementation of the Emergency Rental Assistance Program (ERAP). I am Katherine Leitch, a Senior Policy Analyst with the Citizens Housing and Planning Council (CHPC). CHPC is a non-profit, civic research organization dedicated to addressing New York City's housing and planning needs.

Often, testimony is an opportunity to illuminate a problem that is not widely recognized. The problem before the committees assembled today is well-known and can be described simply. By the end of July, less than 1% of the \$2.7 billion allocated to ERAP was paid out on behalf of New York's low-income renters. Tenants and property owners are falling deeper into debt while they compile evidence of the financial damage that COVID-19 has wrought. Every billing cycle that ticks by makes housing circumstances more tenuous. The administrative hurdles to access relief cause additional pain. When a New Yorker is suffering from a heart attack, we don't ask them to verify their insurance before performing CPR. The administrative burden does not have to be borne by those who are suffering, and it does not have to occur before we render help.

Some of the early administrative barriers to ERAP are being addressed, for example, the need to complete the lengthy online application in one session. Other barriers remain. As of July 29th, the application still required identity and income documentation for every household member. If ERAP covers rent and utilities for one *household*, why must we require documentation from each household *member*? Isn't it sufficient to know that at least one member has suffered COVID-related financial hardship and lives in a unit with documented rent or utility arrears? If the head of household lost her job during the pandemic, why should child support documentation play a role in whether she receives relief? If another household member has been fortunate enough to remain employed, should we expect him to compensate for the lost income? Trying to offset one financial loss by creating another, exacerbates and obscures the suffering. Requiring detailed accounting does not demonstrate whether a household is deserving of help, nor does it change the underlying need.

We don't ask the same of everyone trying to take advantage of the COVID safety net. For airlines and their contractors to access \$32 billion in payroll support available through the 2020 CARES Act, they must fill out a brief 5-page form that includes a short table for reporting monthly salary and benefits totals. The table, which demands less information than ERAP's utility arrears table, is considered a "sworn financial statement" and does not require the applicant to provide any supporting documentation. In contrast, ERAP requires that an applicant fill out at least 10 pages of

forms and upload a minimum of 5 supporting documents—reporting requirements that increase with household size and the number of sources that provide income.

New Yorkers are suffering, not looking for a windfall. When taxes are filed for the following year, income can be verified as well as any gross over-payments coming from the ERAP program. Balance sheets can be settled once the crisis has passed. Let's not ask New Yorkers for exhaustive accounting until we are off life support.

We should remember this crisis when we systematically inflict administrative burden on vulnerable New Yorkers trying to access the safety net. CHPC fully supports the careful assessment and redistribution of the administrative burden imposed on ERAP applicants.

Thank you.