



**Commission On
Human Rights**

New York City Commission on Human Rights

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**Joint Testimony of CCHR and HPD
Before the Committee on Housing and Buildings
December 2, 2025**

Good morning Chair Sanchez and members of the Committee on Housing and Buildings. I am JoAnn Kamuf Ward, Deputy Commissioner of Policy and External Affairs at the New York City Commission on Human Rights (Commission or CCHR), and I will be delivering joint agency testimony. With me today from CCHR is Hillary Scrivani, Director of Policy and Adjudications. I am also joined by Lucy Joffe, the Deputy Commissioner for Policy & Strategy and Neil Reilly, Assistant Commissioner for Housing Equity at the New York City Department of Housing Preservation and Development (HPD).

The City is committed to ensuring that every New Yorker has an opportunity address discrimination they experience. In 2020, and again in 2025, the City released *Where We Live NYC* (WWL). Where We Live 2025 (WWL2025) is a five-year fair housing plan that sets out goals, strategies, and commitments to combat housing discrimination and expand housing opportunity across New York City. Goal 1 in WWL2025 is to “Fight discrimination and ensure equal access to housing.” This includes commitments for multiple agencies to work together in order to:

- Expand capacity to address allegations of housing discrimination, with particular attention to source-of-income discrimination, and reasonable accommodation requests, including through community partnerships;
- Create and implement a strategic education campaign to inform housing providers and housing seekers about the New York City Fair Chance Housing Law;
- Educate New Yorkers about their right to be free from discrimination in housing sales, educate housing providers about their obligations under fair housing laws, and specifically recognizes the issue of coop discrimination.

Although CCHR and HPD have limited roles in private market transactions such as co-op purchases, our agencies welcome the opportunity to speak with you today about the City’s housing market and ongoing work to prevent and address housing discrimination.

As HPD has discussed with this Committee, the City’s rental market has long been in a state of housing emergency and across all housing types is experiencing extremely low vacancy rates. WWL2025 notes that limited vacancy can intensify discriminatory practices.

Cooperatives or “co-ops” are one of multiple types of homeownership in New York City. Owners buy shares in the co-op, which functions much like a corporation, and become shareholders in the corporation. The New York State Attorney General regulates the formation and many of the processes involved in operating co-ops.

Co-op members generally elect a board of directors who are charged with ensuring the co-op remains financially stable, resolving conflicts, and overseeing operations. The process of buying into a co-op is unique from other types of housing and increasing transparency in decision-making has long been a policy focus to address a range of concerns, including but not limited to, rooting out discrimination.

When a prospective co-op purchaser believes they have experienced discrimination in the buying process, they have multiple potential avenues for pursuing a remedy. New York City and state laws prohibit discrimination in rental and sales. And individuals who believe they have experienced discrimination can seek redress for discrimination through anti-discrimination agencies, such as the Commission on Human Rights and the NY State Division of Human Rights, as well as in courts.

The Commission has actively worked to raise awareness about the wide range of protections in housing, including the newly enacted Fair Chance Housing Act, as well as disability protections through innovative collaborations and partnerships to reach New Yorkers outside of traditional media channels.

Turning to the bills, I will focus on Intro 407-A.

Intro 407-A amends Title 8 of the Administrative Code, which houses civil rights protections. This bill would add a new chapter, which regulates how and when housing cooperatives communicate with prospective purchasers when they are denying a sale. This includes mandating a statement of all of the reasons that an applicant's offer is not accepted. The bill also creates a private right of action for failing to comply with these requirements and authorizes the Commission to address claims related to timelines, disclosures, and other procedural requirements related to sales, and to evaluate all of the potential reasons a sale may have been denied.

Intro 438 and 1120-A amend Title 26. The former would require cooperative housing corporations to provide approved purchasers with financial information within 14 days of the request. The latter establishes standardized procedures for cooperative apartment boards, requiring co-op boards to provide a complete application package upon request to applicants, and setting timeframes to acknowledge receipt of submitted materials, identify deficiencies, and issue a final decision.

The City supports Council's goals of tackling discrimination, and strengthening transparency and predictability in the co-op application process.

While neither agency plays a direct role in regulating these transactions, we look forward to sharing our collective expertise in discrimination enforcement and the housing market to help inform how these pieces of legislation can best achieve our collective policy goals.

Our agencies look forward to hearing stakeholder input in order to ensure that the pieces of legislation balance stakeholder interests and achieve Council's objectives of eliminating discrimination.

The City welcomes the opportunity to work with Council on these important matters.