



**Testimony of Assistant Commissioner Samara Karasyk
Outreach and Enrollment Efforts for the Rent Freeze Program
& Introduction 798**

**New York City Council
Committees on Finance and Aging
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Good afternoon Chairs Ferreras-Copeland and Chin and members of the Committees on Finance and Aging. I am Samara Karasyk, Assistant Commissioner for External Affairs at the New York City Department of Finance (DOF). I am joined by Pierre Dejean, Assistant Commissioner for Property Exemptions, Bibi Parmar, Director of the Senior Citizen Rent Increase Exemption (SCRIE) and Disability Rent Increase Exemption (DRIE) programs — collectively known as the Rent Freeze Program — and Caryn Resnick, Deputy Commissioner for External Affairs at the New York City Department for the Aging (DFTA). Thank you for the opportunity to testify today on the many changes we have made to the Rent Freeze Program this past year and to discuss our enhanced public outreach program to increase enrollment.

In December 2014, for the first time, we came out with a report about who is eligible for SCRIE and DRIE. We used extensive data analysis to determine how many people qualify and where they reside by neighborhood. At that time, 61,219 households were enrolled in SCRIE and DRIE. We found that approximately 94,000 additional households might be eligible for the program.

We used the data in the report to determine where to focus our outreach as we amped up our efforts to enroll every eligible tenant into the program. We began an intensive, proactive outreach program to engage tenants who may be eligible for SCRIE and began to try new outreach methods to see how to best engage this population. We began these efforts by rebranding the program to make it easier for potential participants to understand what it is about. We renamed it the “NYC Rent Freeze Program.” Then we launched a targeted marketing campaign with a pilot in Brighton Beach, Brooklyn, last summer. Through close collaboration with DFTA, the Mayor’s Community Affairs Unit (CAU), elected officials, community groups,

and senior centers, we embarked on a campaign to enroll every eligible household in the Rent Freeze Program in this neighborhood.

For example, our report showed that one of the top 10 neighborhoods with under-enrollment is Coney Island, Brooklyn. To start the campaign, CAU took our analysis from the report one step further by mapping out where the most eligible households were located in detail within Coney Island. This enabled us to focus our efforts even more. CAU's mapping showed us that the majority of the under-enrolled units are located in the Brighton Beach section of the area, and where these units are clustered. So instead of casting a wide net over all of Coney Island, we used our resources more efficiently by reaching out to senior centers, religious organizations and community groups near the targeted units. The Brighton Beach Business Improvement District, Brighton Beach Neighborhood Association, Shorefront YMCA, the Brooklyn Public Library, and others advised us on the best times and places to reach seniors. The neighborhood association, Shorefront Y, Shorefront Jewish Community Center, and JASA - Senior Center at Luna Park, all served as our main referral locations so that we had a place to send people when they needed in-person, local assistance. At least twice a week over a three-month period, we handed out packets with information about the program and applications in English and Russian. We distributed these materials at the Brighton Beach boardwalk and elsewhere throughout the neighborhood, including transit hubs and local businesses near our targeted households. The information we handed out directed people to enrollment events with our community partners or to community centers where a knowledgeable person could help them enroll in the program. We also put up posters throughout the neighborhood, and enlisted the support of dozens of area businesses, who allowed us to post information about the Rent Freeze Program in their windows.

Over the summer, we handed out approximately 1,500 information packets and applications and held 40 events with 4,088 attendees in Brighton Beach.

Another aspect of our new outreach approach was to bar-code applications that we gave out at informational and enrollment events so that we could capture the success of various types of events. We have found that it takes at least a few months for people to get these applications to us, so we do not have much data yet on the effectiveness of specific events. However, we have analyzed the zip codes of the applications we have received since June, and 687 of the 13,300 applications we have received in the last 12 months were from the zip codes in the Brighton Beach, Coney Island, Gravesend, and Sheepshead Bay neighborhoods. That accounts for about 5% of all applications received. Compared to a 0.5% average increase in applications citywide, we believe this shows that our pilot outreach campaign has had real impact. We are hoping to see this trend continue as we receive more bar-coded applications from these neighborhoods.

In addition, we tried out various marketing approaches to advertise the program and events in Brighton Beach. We did two targeted mailings to drive people to events and publicize the program. We also made robocalls. We worked with local and ethnic media to advertise the program and our events. We placed ads in the Bensonhurst Bean and Sheepshead Bites. In addition, Commissioner Jiha was interviewed by Gregory Davidzon, whose popular Davidzon Russian radio program is followed by many Russian-speaking households in the Brighton Beach area. We had Rent Freeze ads in bus stations throughout the city for the month of July. We worked with NYC Media to target locations in the top 10 under-enrolled neighborhoods with these ads.

We are using our experiences in Brighton Beach to inform how we are approaching outreach in the other nine neighborhoods of the top 10 under-enrolled areas for the Rent Freeze Program. These neighborhoods are: Stuyvesant Town/Turtle Bay, Kingsbridge Heights/Mosholu, Riverdale, Kingsbridge, Throgs Neck/Co-op City, Upper West Side, Kew Gardens/Woodhaven, Upper East Side, Flushing/Whitestone, and Highbridge/S. Concourse. We just completed a Day of Action in the Highbridge/Grand Concourse section of the Bronx. On November 17th, about 50 volunteers, staff from CAU and DOF staff handed out approximately 5,000 information packets about the Rent Freeze Program at targeted bus stops and in buildings with under-enrolled units. The information distributed publicized an enrollment event on November 23rd, co-sponsored with Bronxworks at one of their community centers in the neighborhood. The packets, in English and Spanish, were made up of general program information and applications. Earlier in November, we met with a number of community groups and Council Member Vanessa Gibson to discuss how to best approach outreach in the area. Casa New Settlement, Bronxworks, Senators Serrano and Rivera, as well as Council Member Gibson, have been very helpful and supportive of our efforts.

Next, we will focus on the other eight districts on our top 10 neighborhoods where we believe there is under-enrollment in SCRIE. It is important to note that we are continuing to promote the Rent Freeze Program elsewhere throughout the City at the same time we are focusing our efforts on particular neighborhoods in the hope of educating and informing children or caretakers of potential SCRIE recipients. Last summer, Con Edison included an ad for the Rent Freeze program in their June/July newsletter, which goes to all households that receive their services. We are also partnering with the Community Service Society (CSS) and AARP. AARP sent 10,000 postcards to seniors in target neighborhoods to promote the program and events we have

been hosting with CSS this month. In addition, the Mayor's Office of Public Engagement includes Rent Freeze Outreach in their campaign to educate everyone in rent-regulated units about the zero increase on rent for this year. They are working closely with DFTA and DOF to ensure that they can refer seniors to centers if they need further assistance. We have provided Public Engagement with SCRIE applications in numerous languages, and trained their team about the program. We work with the Mayor's Office of Immigrant Affairs, DFTA, the Mayor's Office of Veteran's Affairs, the Mayor's Office for People with Disabilities, and IDNYC to partner on events that attract seniors and people with disabilities. We also work closely with elected officials to plan and participate in enrollment and informational events.

Overall, so far this year, we have held 130 events for the Rent Freeze Program with 12,288 attendees. Also, as of November 30th, DFTA has participated in approximately 200 outreach events in 2015, which reached more than 15,300 attendees. DFTA also participated in a citywide integrated benefits pilot program at 14 senior centers this year, in collaboration with Single Stop, the New York City Human Resources Administration, LiveOn NY, and other partners. Through this program, enrollment counselors at the 14 senior center sites provided eligibility screening and facilitated enrollment and recertification for a range of benefits, including SCRIE. As part of outreach for the integrated benefits program, DFTA conducted 31 presentations focusing on SCRIE and other benefits for seniors, which were attended by nearly 1,300 individuals. DFTA also distributed about 450 flyers to senior pedestrians and sent 48,000 mailers to the communities surrounding the 14 senior center integrated benefits sites in English, Spanish and Chinese, which promoted the Rent Freeze Program among other benefits. DFTA and DOF participate on monthly conference calls to coordinate efforts around the Rent Freeze Program.

Since December 2014, we have received 13,300 initial applications, and of the applications that have already had determinations, 67% qualified and have been enrolled. That is an additional 6,093 households that have been enrolled, which accounts for about 6.5% of the 94,000 eligible but not enrolled households in our report.

In addition to increasing awareness of the Rent Freeze programs, we have made numerous operational and structural changes within the agency to make sure that we keep people in the program. The Rent Freeze Program is under new leadership. Director Parmar and Assistant Commissioner Dejean have led their team in a top-to-bottom review of all of the operational processes for the program. We will be making many changes in the coming months. Two of our new tenets at the Department of Finance are transparency and excellent customer service. This translates into us being flexible and helpful when people are having trouble navigating our processes to get them the assistance they need. We do not want to lose people who are already enrolled in the program, and we want to make sure that new applicants can successfully apply if they qualify. We are beginning to change how SCRIE/DRIE applications are processed, and are providing multiple channels for review of SCRIE/DRIE determinations of approval or denial.

We seek to make the initial application process simpler for people to understand as well so that we get completed applications up front, instead of receiving partially completed applications that are in pending status for months because we have not received the necessary income or residency documentation. It is important to us that people who qualify for the Rent Freeze Program get us what we need up front so that we can quickly grant them the benefit. Currently, 42 percent of SCRIE applicants and 76 percent of DRIE applicants submit incomplete applications. We believe part of the reason for that is that the income requirements set out in the law are not at all

simple. We are working on an income worksheet that people can complete before submitting their application. The worksheet would inform them up front as to whether their income qualifies them for the program or not. Another improvement underway is that we are working toward a more automated application process. We are examining how the process can be streamlined and how we can better allocate staff across processing areas for all types of exemptions to address high-volume periods in particular areas. For example, employees specializing in renewal applications would learn how to process initial applications so all staff could do processing of both types of applications. We are also working with DFTA and other City agencies in a renewed effort to see if it might be possible to get access to some data streams that would preclude the need for us to ask for certain types of documentation from applicants, such as Social Security information.

On the back-end, we have created many new channels for review when tenants receive a determination from the Department with which they believe is incorrect. We worked with City Council to draft and pass legislation that established an ombudsperson for SCRIE and DRIE. The ombudspersons began in their new roles last August and have already reviewed 200 cases. They participate in all of our policy discussions about the program and inform the changes that we are making. We also have our newly established Office of the Taxpayer Advocate, led by Diana Leyden, who is extremely passionate about making sure that all taxpayers and tenants in the Rent Freeze Program are given an independent review of their cases if they did not get the help that they needed through the normal DOF channels. Like the ombudspersons, the Office of the Taxpayer Advocate works diligently to help people, identifies systemic issues, and proposes policy and legislative solutions as needed.

The Rent Freeze Program is made stronger through the feedback of these new offices. It is also critical that we receive input from the advocates and community organizations that represent participants, potential enrollees, and landlords. For a number of years now, we have held semi-annual meetings with legal advocates for seniors and people with disabilities. These meetings have been very meaningful for us in terms of understanding where our processes need improvement. However, we seek more frequent feedback from advocates, and want to make sure we are capturing input from social services organizations that assist applicants and participants as well. Yesterday, we held a first meeting with a group of advocates that does just that. We look forward to interacting with both of these groups of advocates more frequently and continuing the open and honest dialogue that has begun.

Along with the Mayor's Office for People with Disabilities and the Mayor's Office of Veteran's Affairs, we will be meeting with advocates for people with disabilities next week. Furthermore, we are engaging with landlords for tenants enrolled in the program more closely. We want to help them navigate the program and resolve their issues as they arise as well. Another channel for feedback on the Rent Freeze Program will be Commissioner Jiha's new taskforce on the Rent Freeze Program. He will be hosting quarterly meetings with a group of advocates that represent tenants and landlords to ensure that we have a meaningful dialogue about the program, can work together on changes, and are able to address any issues that arise.

One example of an issue we are addressing is related to complaints we have received that our renewal process is not working as well as it should. We will be making an extraordinary effort to keep people in the program, and we will be relying on you to help us catch people before they lose this critical benefit. We are going to email each Council Member directly every month the

list of constituents in your districts who need to renew their Rent Freeze benefits. We will also be sending these lists to our advocacy and community partners.

We are looking forward to all that we will learn through input from advocates, elected officials and working together to solve problems. But sometimes, we are limited in the policy changes we can make because much of what we do here at DOF is regulated by New York State Law.

Therefore, we have advocated for a number of legislative proposals to improve the Rent Freeze Program, which are crucial in enabling us to have more leniency in its administration and to keep qualified tenants enrolled. This year, we worked with the NY State Legislature on two bills that we believe will improve the program for applicants and participants. These bills both passed and are awaiting the Governor's signature. We are hopeful they will become law by the end of the year. The first bill, A7914 (Cymbrowitz)/S5721(Savino), will allow SCRIE/DRIE beneficiaries enrolled prior to July 2015 to remain in the program if they do not meet the one-third income-to-rent requirement upon renewal as long as they meet all other requirements. This is because until recently, we did not check the one-third income-to-rent requirement at renewal as we did when people initially applied for the program. Because some participants have been enrolled in the program for years, we were concerned that they risked losing the benefit or having to pay a lot more in rent upon renewal once we began checking for the one-third income-to-rent requirement. This legislation protects them from that risk. New applicants will not face any spikes in their rent because we will be checking this requirement each time they renew.

The second bill, A7247-A (Simotas)/S5826-A (Lanza), establishes the ability for a qualifying tenant to take over a benefit when the head of household dies or permanently leaves the household. We refer to this as a benefit takeover. Before this legislation was introduced, the law

did not have any section to deal with benefit takeovers. The bill establishes a benefit takeover process, including at least a six-month time period for a qualified tenant to apply for the program.

We are working on another bill that we hope will pass the NY State Legislature this coming year. A8228 (Cymbrowitz)/S6214 (Golden) has already been introduced in both houses. This bill would allow a participant back into the program at their old frozen rent if they lose the benefit for one lease term because of an increase to their income.

In addition to seeking NY State legislation, in another effort to keep participants from losing their benefit, we have promulgated rules to allow SCRIE/DRIE beneficiaries more than six months to renew their benefit or initiate a benefit takeover if there are extenuating circumstances, such as a head of household being hospitalized. This rule gives someone with extenuating circumstances an additional 18 months from their lease expiration to renew at their old frozen rent. We are also establishing a new process for participants who miss their renewal period because they have a disability covered under the American with Disabilities Act (ADA). If they miss their renewal because of a reason covered by the ADA, we will review their case at any point after the benefit expired, and will reinstate the benefit at the old frozen rent if they can provide us the documentation we need. We originally proposed these rules through a public process in August. We made changes to them based on feedback we received from advocates — both through the formal rulemaking process, and in more informal conversations that we had. We published the final rules on Monday, and they will go into effect in January. We are confident that these new rules will help SCRIE and DRIE participants keep their benefits.

Before closing, I would like to comment on Introduction 798. We worked closely with Council Member Cornegy's Office to address concerns he raised about the confusion many tenants have about the difference between preferential and legal rent. Our collaboration is reflected in this bill. Many participants do not realize they have a preferential rent until they are enrolled in the Rent Freeze Program — this is because the program only allows for us to freeze the rent at the preferential amount if it is for the lifetime of the tenancy. In many cases, the tenant receives preferential rent only for the term of the lease. This bill seeks to clarify preferential versus legal rent, and under what circumstances DOF will freeze rent at the preferential amount. We support this legislation; however, we are still working with the Law Department and City Council to finalize the language.

Thank you again for the opportunity to testify today. We would be happy to answer any questions you may have at this time.