



**New York City  
Department of Finance  
Proposed Amendments to SCRIE/DRIE Rules  
October 22, 2020**

Thank you for the opportunity to submit testimony in regards to the NYC Department of Finance’s (DOF) recently proposed amendments to SCRIE (Senior Citizen Rent Increase Exemption) and DRIE (Disability Rent Increase Exemption) rules.

LiveOn NY’s members include more than 100 community-based organizations that provide critical services that allow older adults to thrive in their communities. These include senior centers, home-delivered meals, affordable senior housing with services, and case management. LiveOn NY advocates to increase funding and capacity for our members to meet the needs of older adults in their communities.

LiveOn NY also administers a citywide outreach program that assists older adults in the communities where benefits are most underutilized. Through this program, we educate thousands of older adults each year—including those who are homebound—and screen and enroll those who are eligible for SCRIE/DRIE, and a number of other benefits. Our team works tirelessly to help older adults through the application and re-enrollment processes, and witnesses firsthand the positive impacts of these critical programs. DOF has been an incredible partner particularly in our work with SCRIE and DRIE, and it is because of this partnership that we would like to provide comments on several of the proposed changes.

Having submitted comments on the proposed changes outlined in December of 2019, we deeply appreciate the thoroughness and thoughtfulness of this review process, and the extent to which the City has clearly sought to take into consideration the comments of public stakeholders such as ourselves.

With this in mind, our responses to the proposed changes are as follows:

1. In our previously submitted comments, LiveOn NY shared concerns of the ability for an applicant to reapply in the same calendar year, should the initial application be denied. Our team has helped a number of individuals successfully reapply for the program after having first been denied due to an incomplete or incorrect application. We deeply appreciate this being rectified via explicit language proposing that, *“A tenant may submit more than one initial application and, if applicable, more than one renewal application each calendar year.”*
2. Under current rules, when a tenant applies for the SCRIE/DRIE program at the time of their lease renewal, the legal regulated rent amount would be that of the prior lease preceding the application/eligibility date. We therefore appreciate the explicit continuation of this policy, evidenced through the language: *“If such tenant is found eligible, the renewal order will be deemed to have taken effect upon expiration of the prior rent increase exemption order.”*
3. We support the broadened definition of “good cause,” particularly if, *“the tenant demonstrates other exceptional circumstances.”* LiveOn NY asks that this be implemented as inclusive of circumstances such as on-going health-related challenges that do not necessarily result in hospitalization, such as cognitive impairment due to dementia, the aftermath of a stroke, or other



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illness, such as COVID-19.

4. LiveOn NY appreciates DOF's inclusion of the potential for co-head of household designations.
5. LiveOn NY appreciates the change in definition of "Initial eligibility date," which now proposes eligibility on the first day of the first month after application *receipt*, as opposed to *approval*, as was indicated in the previous rule proposal.
6. LiveOn NY supports the inclusion of the term "tenant representative," as an addition to the term "agent." As advocates with experience assisting older tenants through the application process, LiveOn NY, as well as many of our members, looks forward to continuing to fulfill the role of tenant representative in the future.

LiveOn NY is grateful for the opportunity to provide feedback to the proposed SCRIE/DRIE rules, and welcomes any questions or follow up conversations. We are committed to working with our partners at the Department of Finance as we ensure New York is a better place to age.

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*LiveOn NY's members provide the core, community-based services that allow older adults to thrive in their communities. With a base of more than 100 community-based organizations serving at least 300,000 older New Yorkers annually. Our members provide services ranging from senior centers, congregate and home-delivered meals, affordable senior housing with services, elder abuse prevention services, caregiver supports, case management, transportation, and NORCs. LiveOn NY advocates for increased funding for these vital services to improve both the solvency of the system and the overall capacity of community-based service providers.*

*LiveOn NY also administers a citywide outreach program and staffs a hotline that educates, screens and helps with benefit enrollment including SNAP, SCRIE and others, and also administers the Rights and Information for Senior Empowerment (RISE) program to bring critical information directly to seniors on important topics to help them age well in their communities.*