



Department of Finance

Preston Niblack, Commissioner

ANNUAL REPORT

The SCRIE and DRIE Ombudspersons
New York City Rent Freeze Program

The NYC Office of the Taxpayer Advocate
October 1, 2025

Table of Contents

Executive Summary.....	1
Part I: Introduction	3
A. Rent Freeze Program Overview	3
B. Establishment of Ombudsperson Positions and Reporting Requirements	3
C. Operations of the Rent Freeze Program Ombudspersons	4
Part II: Recommendations from the Current Reporting Period, Fiscal Year 2025.....	5
A. Legislative Priorities	5
1. “One-Third Rule” Alignment.....	5
1(a). Frozen Rent Proportionality.....	5
1(b). Safeguards for Earners Near Poverty Level.....	7
2. Common Sense Benefit Takeover Improvements.....	8
2(a). Grace Period for Surviving/Remaining Tenants.....	8
2(b). Elimination of Redetermination Delay	8
B. Operational Elements	9
1. Preventing Premature Revocation	9
2. CRM Submission Phase-Out	10
3. Improving TAP Functionality.....	10
3(a). Document Preview Function	10
3(b). Notices via Email.....	11
4. Application Assistance Line	11
5. Centralized Application Documents Repository.....	11
6. Reinstatement Post-Section 8.....	11
7. Automatic Income Verification.....	12
Part III: Rent Freeze Program Case and Inquiry Statistics for Fiscal Year 2025.....	13
A. Total Inventory of Cases and Inquiries	13
B. Cases and Inquiries by Source	13
C. Cases and Inquiries by Subject Matter	15
D. Cases and Inquiries by Borough	17
E. Dollar Impact of Ombudspersons’ Work.....	18

Part IV: Ongoing Developments	19
A. Outreach and Training	19
B. Forms Committee and TAP Renewals	19
C. Tenant Protection Cabinet	20
D. PEU “Benefits on Your Block” and Failure-to-Renew Collaboration	20
E. Legislation	20
1. Changes to Income Definition	20
2. Rule Language Regarding Annual Retirement Benefit Increases	21
3. Notable Proposals in the New York State Legislature’s 2025-26 Session	21
(a) Higher Income Limit and Annual Consumer Price Index Adjustment	21
(b) Income-Based Frozen Rent Calculation	22
(c) Notification Requirements	22
(d) Language Services	22
(e) Two-Year “Income Spike”	22
(f) Program Expansion Based on Rent-to-Income Ratio	22
(g) Change in Redetermination Requirements	23
Part V: Success Stories	24
Part VI: DOF Actions on Prior Recommendations	27
APPENDIX I Ombudspersons’ Case and Inquiry Dollar Impact by City Council District	31
APPENDIX II Glossary of Terms	33

New York City Office of the Taxpayer Advocate

The SCRIE and DRIE Ombudspersons Fiscal Year 2025 Annual Report (Reporting Period: July 1, 2024 – June 30, 2025)

Executive Summary

The Senior Citizen Rent Increase Exemption (SCRIE) ombudsperson and Disability Rent Increase Exemption (DRIE) ombudsperson positions were created by the New York City Council in 2015 to investigate and address issues concerning the Rent Freeze Program.¹ The ombudspersons are situated within the Office of the Taxpayer Advocate (OTA) in the Department of Finance (DOF). As part of their duties, the ombudspersons provide data regarding their work at the end of each fiscal year and make annual recommendations to the commissioner of DOF regarding Rent Freeze Program operations. In the following pages, the ombudspersons deliver their eighth annual report on the New York City Rent Freeze Program. This report covers the period beginning July 1, 2024, and ending June 30, 2025.²

This year, for the first time since 2021, the number of matters directed to the ombudspersons decreased compared to the prior reporting period. This decrease was likely influenced by the phasing out of special COVID policies and the recent change in the statutory definition of income for the Rent Freeze Program, which, together with a more streamlined form, resulted in a more straightforward application process. Participants who communicated with the ombudspersons continued to emphasize the importance of the program to their housing security while expressing concerns regarding the accessibility and reliability of DOF’s Rent Freeze customer service, whether by phone or email.

The ombudspersons’ recommendations this year reintroduce key legislative changes that in their view remain necessary to achieve the fundamental intent of the program. Other recommendations in this report aim to reduce barriers and delays in the administration of the program, especially in terms of participants’ access to their own application status and benefit details. All recommendations align with DOF’s ongoing commitment to ensuring that the Rent Freeze Program remains a fair and reliable resource for qualifying New Yorkers.

¹ The Rent Freeze Program comprises both SCRIE and DRIE.

² The twelve-month period beginning July 1, 2024, and ending June 30, 2025, is both the ombudspersons’ reporting period and DOF’s fiscal year 2025. This period may be referred to in this report as the “2024-25 reporting period,” “fiscal year 2025,” etc.

The ombudspersons put forward their specific recommendations to the DOF commissioner in Part II of this report, focusing on the following key areas:

1. Alignment of the “one-third rule” with program goals.
2. Improving the efficacy of benefit succession.
3. Preventing revocations prior to the mandated six-month grace period.
4. Changes to the channels for online document submission.
5. Improving access to documents once submitted electronically.
6. Providing real-time Tenant Access Portal assistance.
7. Centralizing storage of electronic document submissions.
8. Considerations for tenants temporarily receiving other benefits.
9. Alternative income verification processes for applicants.

As in previous reporting periods, the ombudspersons performed their duties with an eye toward DOF’s larger mission to administer the tax and revenue laws of the City fairly, efficiently, and transparently to instill public confidence and encourage compliance while providing exceptional customer service.

Further information about the Rent Freeze Program is available at www.nyc.gov/rentfreeze. Previous annual reports can be accessed through the site’s [How to Get Help](#) page. Information about the Office of the Taxpayer Advocate is available at www.nyc.gov/taxpayeradvocate.

Part I: Introduction

A. Rent Freeze Program Overview³

The Rent Freeze Program's objective is to help seniors and people with disabilities to remain in their homes by "freezing" the dollar amount of their monthly out-of-pocket rent. Any increases in rent beyond the "frozen" amount are covered by a tax credit that is applied as a reduction to the building's property taxes.

Between 2016 and 2019, the number of Rent Freeze households in New York City increased each year, from 72,299 in 2016 to a high of 75,515 in 2019. In 2020, the total number decreased by 5.1% to a total of 71,665 households, 59,862 of which received SCRIE benefits and 11,803 of which received DRIE benefits. By 2024, the total number of Rent Freeze households had declined to 67,677, comprising 56,665 SCRIE and 11,012 DRIE recipients. For 2023, the most recent year for which eligibility estimates are available, an estimated 158,214 total households were eligible for the Rent Freeze Program.

The average age of benefit recipients in 2024 was 77 for SCRIE and 64 for DRIE, and average household size was 1.5 persons for both SCRIE and DRIE. The average number of years that recipients stayed in the program ranged from 8.2 years in Staten Island to 9.6 years in the Bronx and between 10.2 and 10.9 years in Brooklyn, Manhattan, and Queens. A higher number of years in the program correlated with a higher average monthly benefit amount.

B. Establishment of Ombudsperson Positions and Reporting Requirements

Section 11-137 of the New York City Administrative Code establishes the SCRIE and DRIE ombudsperson positions within DOF. This section also states that the ombudspersons' duties will include:

- (i) establishing a system for such ombudspersons to receive complaints with respect to each such rent increase exemption program;*
- (ii) investigating and responding to complaints received [pursuant to (i), above]; and*
- (iii) making recommendations to the commissioner of finance regarding the administration of each such rent increase exemption program, which may include recommendations for training appropriate department of finance staff members.⁴*

The ombudsperson positions are within the Office of the Taxpayer Advocate, which reports directly to the DOF commissioner.

³ The figures in Part IA were reported in DOF's 2025 *Report on the New York City Rent Freeze Program*. The 2025 report contains the most recent Rent Freeze statistics published by DOF.

⁴ New York City Administrative Code § 11-137 (a)(1).

In addition to establishing the ombudsperson positions, NYC Administrative Code Section 11-137 requires DOF to submit an annual report to the New York City Council:

No later than October first of each year, the department of finance shall submit a report to the council for the prior fiscal year, indicating:

- (i) the number and nature of inquiries received by the department of finance and the 311 citizen service center regarding the rent increase exemption programs;*
- (ii) the number, nature, and resolution of comments and complaints received by the ombudspersons ... regarding the rent increase exemption programs; and*
- (iii) any recommendations made by any such ombudsperson to the commissioner of finance regarding the administration of such rent increase exemption programs.⁵*

C. Operations of the Rent Freeze Program Ombudspersons

The ombudspersons primarily assist tenants with applying for, maintaining, or reinstating Rent Freeze Program benefits when they have been unable to resolve their issues through regular DOF channels. As required by the New York City Administrative Code, the ombudspersons' contact information is included on certain SCRIE and DRIE forms and notices, including those related to the denial of an application or its ensuing appeal, the revocation or termination of benefits, and the denial of a tenant's application to take over an existing benefit. The ombudspersons also monitor cases and input from program participants and community-based organizations to identify larger issues affecting the efficacy of the program with respect to its intended goals.

For fiscal year 2025, the total estimated dollar impact of the ombudspersons' casework is \$1,884,538 in benefits received.⁶ The ombudspersons' casework comprised matters involving tenants residing in each of the city's 51 council districts. More information on dollar impact by district is available in Part III and Appendix I of this report.

⁵ New York City Administrative Code § 11-137 (a)(3).

⁶ See Appendix I (p.31).

Part II: Recommendations from the Current Reporting Period, Fiscal Year 2025

The first set of recommendations for this reporting period require legislative action by the New York State legislature. These recommendations are followed by matters to be undertaken internally by DOF, whether via rulemaking or policy change.

A. Legislative Priorities

Two sets of legislative recommendations, regarding the so-called “one-third rule” and the benefit takeover processing rules, address the changes most urgently needed to bring the program in line with its intended purpose.

1. “One-Third Rule” Alignment

1(a). Frozen Rent Proportionality

According to SCRIE’s eligibility rules, an applicant’s rent must be greater than one-third of their monthly income (the “one-third rule”). As a result, at the time of the initial application and at each renewal, an applicant whose existing frozen rent is less than one-third of monthly income will have their frozen rent increased to equal one-third of their monthly income. For a tenant whose frozen rent is increased under the one-third rule, the increase becomes permanent, regardless of whether the tenant’s income subsequently decreases.⁷ In contrast, the tenant whose benefit is revoked for exceeding the income limit can restart during the following calendar year at the prior frozen rent, with no increase (the so-called “income spike rule”), assuming eligibility requirements are met at the time of reapplication. Under current practice, a renewing Rent Freeze tenant with a significant, one-time increase in income can face different possible outcomes without any justification for the disparity. More importantly, the outcome may arbitrarily hinder the program’s ability to preserve affordability for certain tenants.

The tenants in the following example are hypothetical but reflect actual tenants in substantially the same position. Prior to 2022, Tenants A and B both had annual household incomes of \$35,000, the same frozen rent (\$1,000), and the same legal rent (\$1,500). In 2022, special pandemic unemployment payments raised Tenant A’s income to \$50,100 and Tenant B’s income to \$49,500. As a result, Tenant A’s benefit was revoked, while Tenant B’s frozen rent increased to \$1,375. The following year, both tenants’ incomes returned to their normal level. Tenant A reapplied and, under the income spike rule, continued in the program at the original frozen rent. Despite Tenant B’s income also returning to its prior level, Tenant B’s monthly frozen rent at renewal remains at \$1,375. As a result, Tenant B will pay \$4,500 more in rent each year in perpetuity compared to Tenant A, even if Tenant B’s income continues to diminish.

⁷ While this is DOF’s current practice, OTA found no indication in its research on the applicable statutes that the frozen rent, once increased, was required to remain at that level, as opposed to being returned to its previous level in subsequent income years so long as the tenant still paid at least one-third of income toward rent. On this and any other questions of legislative permissibility regarding the recommendations in this report, however, DOF’s official position would be determined by its Legal Affairs Division.

Example of “1/3 Rule” Without Recommendation

2022

- Both have same annual income (\$35,000)
- Both have same monthly legal rent (\$1,500)
- Both have same monthly frozen rent (**\$1,000**)

2023

- Same legal rent per RGB increases
- Special Pandemic Unemployment raises annual income to:
 - Tenant A: \$50,100 → **BENEFIT REVOKED***
 - Tenant B: \$49,500 → **MONTHLY FROZEN RENT INCREASES TO \$1,375**

* Tenant A will lose between 1 and 12 months of benefit depending on the timing of lease and application.

2024

- Same legal rent per RGB increases
- Same annual income (returns to \$35,000)
- **Frozen Rent Disparity**
 - Tenant A: **MONTHLY FROZEN RENT RETURNS to \$1,000** through “income spike” provision
 - Tenant B: **MONTHLY FROZEN RENT CONTINUES at \$1,375**

2025

- Same legal rent per RGB increases
- Tenant A annual income **increases** to \$35,500
 - **Monthly frozen rent is \$1,000**
- Tenant B annual income **decreases** to \$29,000
 - **Monthly frozen rent continues at \$1,375**

2026

- Same legal rent per RGB increases
- Tenant A annual income **increases** to \$35,750
 - **Monthly frozen rent is \$1,000**
- Tenant B’s annual income **decreases** to \$24,000
 - **Monthly frozen rent continues at \$1,375**



Aside from the outcome being inequitable on its face, the existence of the income spike rule suggests that the difference in outcomes is unintentional. The income spike rule exists for the express reason of allowing tenants to have one anomalous income year (up to three separate times) without having to start again at a higher frozen rent that would not be affordable under their normal income. All tenants should have this same opportunity, rather than excluding some tenants based on a superficial distinction.

Recommendation: Application of the one-third rule should result in the tenant paying at least one-third of current application income, whether higher or lower than the prior frozen rent, so long as the frozen rent does not fall below the original frozen rent amount approved with the initial application. If necessary, DOF should pursue legislative changes to effect this recommendation.

Under this recommendation, the outcome for Tenant B in the example above would change as follows, with Tenant A and Tenant B both continuing at a frozen rent of \$1,000:

	2022		2023 *		2024		2025		2026	
	Income	Frozen Rent	Income	Frozen Rent	Income	Frozen Rent	Income	Frozen Rent	Income	Frozen Rent
Tenant A	35,000	1,000	50,100	1,273**	35,000	1,000	35,500	1,000	35,750	1,000
Tenant B	35,000	1,000	49,500	1,375	35,000	1,000	29,000	1,000	24,000	1,000

* In 2023, Tenant A loses between 1 and 12 months of benefit reapproval as income spike.

** Tenant A's 2023 rent figure is the average rent paid if revoked for 6 months before re-entering program.

1(b). Safeguards for Earners Near Poverty Level

In accordance with a legislative change in 2015, the Rent Freeze Program requires that participating tenants pay at least one-third of their income toward their rent. For applicants at the lowest income levels, the one-third rule can result in a harsh penalty, either in the form of program exclusion or higher frozen rent. For example, if a couple living on less than \$1,800 per month is fortunate enough to find an apartment for \$500 per month, they will not be able to freeze their rent at that amount. They will continue to pay their rent increases until their rent reaches at least \$600 per month, at which point they will become income-eligible for Rent Freeze. For this couple, whose income is only 5.7% over the U.S. poverty guideline, the one-third rule has both delayed their entry into the program and ensured that they will pay an additional \$1,200 in rent per year than they otherwise would have. Moreover, if, for example, their extended family offers them an additional \$150 per month for living expenses, the one-third rule may either cause their frozen rent to increase or exclude them from the program entirely.

To require that households living close to the poverty line pay more in rent before becoming eligible for the program seems contrary to the program's intent of preserving affordability and housing security for low-income seniors and disabled persons.

Recommendation: DOF should pursue legislative changes to ensure that households with an income of 150% or less of the federal poverty guideline are not subject to the one-third rule.⁸

2. Common Sense Benefit Takeover Improvements

2(a). Grace Period for Surviving/Remaining Tenants

Benefit takeover applications can coincide with extremely difficult circumstances for tenants, as they often follow the death or permanent hospitalization of a household member. In addition to the other hardships associated with these types of events, landlords may pressure remaining household members to relinquish the apartment once the prior tenant is gone. Under the current rules, successor tenants may take up to six months to submit a benefit takeover application, but they are required to be eligible immediately upon the death or permanent relocation of the prior tenant. This means that a tenant who turns 62, or finally begins receiving disability benefits just a few days after the prior tenant's departure, loses the household's frozen rent and must start the application process again as if the household had never had the benefit. For some successor tenants who are just shy of 62, or who have only recently applied for disability benefits in response to the loss of the prior tenant's income, the household's frozen rent may have been in place for years, and it is extremely unlikely that their income will increase at all, much less enough to cover a much higher frozen rent.

To protect the affordability of rent for these households, successor tenants should be provided with a grace period for eligibility for the program that extends at least through the six months provided for submitting the application or the remainder of that calendar year, whichever allows them more time. Although they would not actually receive the benefit until the month that they fulfilled the eligibility criteria, the additional six months to a year provided to the successor tenant would provide for a more reasonable transition period for households that are already relying on the program for housing security and include a tenant who will shortly be able to take the place of the prior tenant.

Recommendation: DOF should pursue amendments to Rent Freeze legislation that would allow tenants who reach age or disability benefit eligibility within the six months provided for submitting the benefit takeover application or sometime before the end of the same calendar year (whichever provides more time) to take over a program benefit if all other eligibility criteria are met. The tenant's household would not receive the benefit until the month of actual eligibility, but they would be eligible to apply and then restart the existing benefit as of the month of eligibility.

2(b). Elimination of Redetermination Delay

If a tenant experiences a permanent income loss of 20% or more, the tenant may be eligible for a redetermination that could lower the frozen rent. If an event, such as the death or permanent

⁸ The percentage is based on *The New York City Government Poverty Measure 2020 Report*, issued by the Mayor's Office for Economic Opportunity in May 2023, which estimated a New York City poverty threshold approximately 46% higher than the U.S. poverty threshold.

move of the primary tenant, provides the basis of both a benefit takeover and a redetermination, the applicant can apply for both via a single application. But even when a benefit takeover and redetermination are submitted and approved simultaneously, the effective date of one almost never occurs at the same time as the other. A benefit takeover becomes effective immediately after the prior benefit is revoked, even retroactively if necessary, so that there is no break in the benefit. The redetermination, however, is only effective starting with the month following DOF's receipt of the application.

In an actual example from the prior reporting year, a SCRIE tenant died in July 2023, leaving his widow as his successor tenant. The household income had been declining steadily due to the illness leading up to his death, and by the time he passed away, his widow was struggling to pay for basic necessities. She applied for a SCRIE benefit takeover as soon as she was able to obtain a copy of the death certificate, which was not until August 27, 2023. She mailed the benefit takeover and redetermination application on that date and the application entered SCRIE's records on September 1. By SCRIE's calculations, the loss of her husband's income entitled the tenant to pay \$969 less than the frozen rent before the redetermination. While the widow technically took over the prior benefit as of August 1, 2023, the redetermination's effective date was not until October 1, 2023, based on the date that SCRIE deemed to have received the application. As a result, she paid nearly \$2,000 in additional rent during the first two months after her husband had passed away.

Given the time that it can take to complete a benefit takeover application (which can be delayed by elements out of the applicant's control, such as waiting for a death certificate or a nursing home letter to be issued), the tenant may not get the relief that the redetermination is meant to provide until several months have passed. These months may be extremely difficult financially for the redetermination applicant as, by definition, they must adjust to the loss of a substantial amount of income despite their rent obligation remaining the same. In other words, if an event resulting in immediate income loss requires that a successor tenant take over a program benefit, the tenant's need for alleviation of the corresponding hardship will be just as immediate. The effective dates of redeterminations that coincide with benefit takeovers should reflect this dynamic.

Recommendation: Redeterminations based on an income loss caused by the death or permanent relocation of an applicant should become effective concurrently with the corresponding benefit takeover rather than being tied to the timing of the application submission.

B. Operational Elements

1. Preventing Premature Revocation

Under program rules, tenants automatically receive a six-month grace period following the end of their prior approved benefit period to complete the renewal process. Under the current notification system, however, tenants may receive a revocation letter for failure to renew before the grace period ends. This practice leads to confusion and distress: tenants and their representatives frequently contact the ombudspersons believing they have been permanently

revoked and must either reapply—at a higher frozen rent—or file an appeal. Community-based partner organizations also report that tenants are often too alarmed by the revocation notice to believe that they remain eligible under the grace period—or, they are uncertain of their approval dates and unsure when their grace period expires.

Recommendation: DOF should revise the notice cycle to ensure that tenants receive clear notification of their grace period end dates earlier in the process, and that final revocation letters are not sent before the end of the grace period. In addition to prominently stating the grace period’s expiration date, all notices should explain that DOF must receive outstanding documents on or before that date. Ideally, notices would also clarify that tenants may continue paying their frozen rent while their renewal is under review, though they may still owe increases for that lease period if the renewal is ultimately denied or revoked.

2. CRM Submission Phase-Out

In 2019, DOF introduced an online customer relationship management (CRM) system to allow program participants to submit feedback and simple inquiries, with the option to attach supporting documents. CRM was not intended for application submission. At the onset of the COVID-19 pandemic, however, applicants faced difficulties submitting applications by mail, and the Tenant Access Portal (TAP) was still in early development. As a temporary solution, applicants were permitted to submit documents via CRM.

Unlike TAP, which allows direct uploads into the application queue, CRM submissions must be manually downloaded and re-uploaded by a customer service representative. This process introduces delays and errors. Although TAP has been in place for several years, DOF continues to accept CRM submissions. Rising inquiries to the ombudspersons regarding lost or delayed CRM documents highlight the inefficacy of this practice.

Recommendation: DOF should phase out CRM-based submissions and require applicants to use TAP for all uploads. The transition should be supported with robust outreach and marketing, including multilingual materials and targeted communications that emphasize TAP’s benefits.

3. Improving TAP Functionality

3(a). Document Preview Function

The program’s application process often requires multiple document uploads. TAP currently does not allow applicants to view previously uploaded files, either during or after submission. This limitation results in duplicative uploads, omissions, and unnecessary inquiries.

Each year, the ombudspersons receive many complaints about notices requesting documents that applicants have already submitted. These applicants often turn to the ombudspersons only after unsuccessful attempts to confirm submission through 311 or DOF customer service. Because documents are visible only to DOF staff until processed, automatic notices continue to generate requests for already-submitted materials. Allowing applicants to view their uploads would significantly reduce these issues and help applicants identify defective submissions, such as unsigned leases or income documentation from the wrong year.

Recommendation: DOF should add a document preview feature in TAP, enabling applicants to view all files they have uploaded.

3(b). Notices via Email

TAP requires each applicant to provide an email address, creating an opportunity to improve communication. Currently, most notices are mailed, creating delays and risks of lost correspondence. Sending notices by email—while continuing to mail hard copies—would expedite communication and improve applicants’ access to status updates. Providing electronic approval letters would also help tenants furnish proof of benefit to landlords more efficiently.

Recommendation: DOF should begin sending notices by email and make all mailed notices available for download in PDF format through TAP.

4. Application Assistance Line

This year, the ombudspersons received nearly 30 inquiries from applicants who began applications in TAP but could not complete them due to technical issues. A recurring example involved re-applicants previously denied who were blocked from starting new applications due to an error message about pending status. Current inquiry channels—311 or CRM—often leave tenants without timely solutions, causing them to abandon applications and deterring future TAP use.

Recommendation: Applicants calling 311 for real-time TAP assistance should be routed directly to staff trained to resolve submission issues. These staff should also have escalation contacts within the Finance and Information Technology Division.

5. Centralized Application Documents Repository

Document submission status remains the most frequent concern raised with the ombudspersons. Currently, DOF maintains two repositories—one for certain TAP applications and one for all other submissions—making status verification cumbersome and less reliable. Depending on the information provided by the tenant, it can be difficult to confirm whether a document has been received or entered into the review queue. The current separation of documents makes both processing and providing effective customer service more time-consuming and potentially less accurate.

Recommendation: DOF should consolidate all Rent Freeze applications and supporting documents into a single repository that provides descriptive details and status information equivalent to those currently available in the primary repository.

6. Reinstatement Post-Section 8

When a Rent Freeze tenant transitions to Section 8, changes to their rent share may render them ineligible under current program rules. If they later lose Section 8 and reapply, they must submit a new initial application, and their frozen rent resets to the current legal rent, not their prior

frozen amount. While technically compliant with program rules, this practice can result in steep rent increases, effectively penalizing tenants for temporarily using another housing benefit.

For example, a tenant approved for DRIE in 2008 at a frozen rent of \$573.13 transitioned to Section 8 in 2023. After losing Section 8 in 2025, her reapplication reset her frozen rent to \$864.69—despite her sole income being SSI benefits.

Recommendation: Establish an internal policy to preserve prior frozen rent levels for returning Rent Freeze applicants who lose their Section 8 benefits. This recommendation may require legislation.

7. Automatic Income Verification

Applicants often face challenges in obtaining or submitting required income documents, and confusion over the correct income year leads to incomplete applications and denials. With recent statutory changes shifting the program to rely primarily on adjusted gross income—a single figure from federal or state tax returns—there is now an opportunity to reduce this burden. Using existing income data to verify tenants’ reported income could reduce the number of documents that tenants must obtain and submit as part of the application process.

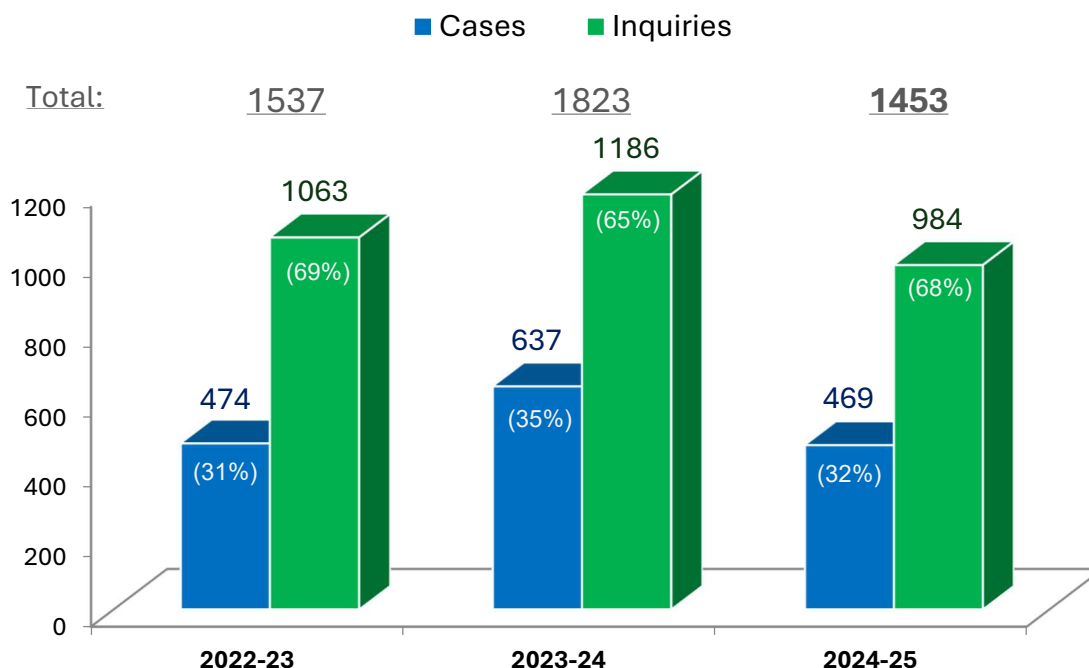
Recommendation: DOF should explore implementing optional automatic income verification for tenants, enabling income eligibility to be confirmed directly through NYS Department of Taxation and Finance data. This will provide applicants the option to obtain and provide fewer documents with their applications, and potentially reduce application review time.

Part III: Rent Freeze Program Case and Inquiry Statistics for Fiscal Year 2025

A. Total Inventory of Cases and Inquiries

During the reporting period of July 1, 2024, to June 30, 2025, OTA classified matters managed entirely within OTA as “inquiries” and those requiring the involvement of outside offices as “cases.” This year brought cases and inquiries with a total of 1,453 matters, down from last year’s number by 20%. When disaggregated into cases versus inquiries, the decrease in cases was 26%, versus a more modest 17% decrease in inquiries. As in prior years, SCRIE matters outnumbered DRIE matters by a ratio of approximately 4 to 1.

SCRIE and DRIE Ombudsperson Total Workload by Fiscal Year



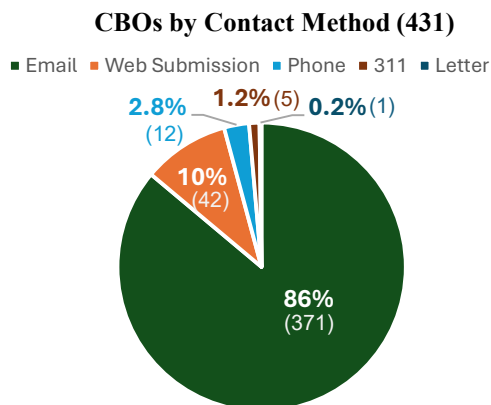
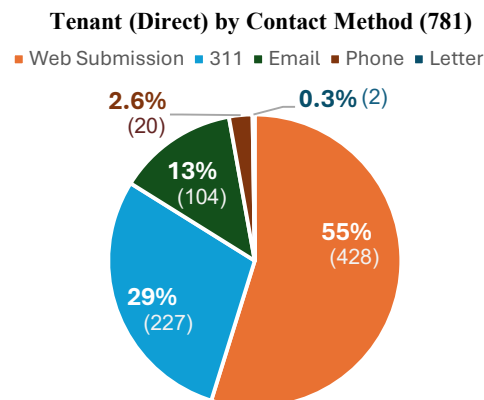
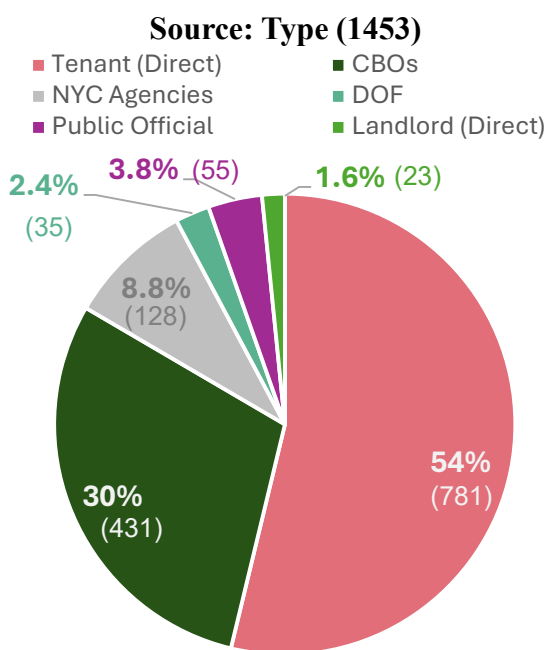
B. Cases and Inquiries by Source

OTA tracks the origins of Rent Freeze Program-related cases and inquiries, both in terms of the initiating party and the communication medium. The breakdown by source type for this reporting period closely resembled the numbers for 2024-2025 in most categories. For the current period, about 54% of matters were directly initiated by tenants (or their family or friends) and the remainder came through third-party intermediaries. Community-based organizations (CBOs) were the leading third-party representatives, unchanged from the prior period with 30% of all matters. Other third parties included City agencies outside of DOF (8.8%), DOF referrals (2.4%), public officials (3.8%), and landlords on behalf of tenants (1.6%).

In terms of communication methods, usage by source varied significantly within each method category in a pattern similar to 2023-24’s breakdown. For CBOs, emails represented 86% of

their communications, while only 10% were web submissions. In contrast, only 13% of tenants contacted the ombudspersons via email and 55% used web submissions. The overall percentage of matters accepted via 311 transfers increased from 3% in the prior period to the current period's 29%, and the current period saw a continuation of the disparity in 311 use among tenants (29%) versus CBOs (2.8%).

Total Cases and Inquiries by Source for Fiscal Year 2025



C. Cases and Inquiries by Subject Matter

In this section of the report, the ombudspersons present their observations regarding notable changes in the number of matters, when disaggregated by subject matter, as compared to the prior year. The total counts by category for this reporting period are as follows:

Issues Presented	RY2023	RY2024	RY2025	vs. RY2024
Total^[1]	2068	2412	1645	767↓ (32%↓)
Submission Status – File Review Required	424	551	490	61↓ (11%↓)
Completing Application – Assistance Required	446	544	277	267↓ (49%↓)
General SCRIE/DRIE Program Information	257	252	166	86↓ (34%↓)
Appeal	87	248	157	91↓ (37%↓)
Tax Abatement Credit (TAC) Issues	119	132	77	55↓ (42%↓)
Landlord/Owner Noncompliance	137	114	74	40↓ (35%↓)
Request for TAC Report	42	72	58	14↓ (19%↓)
Request for Clarification of Notice Received	80	94	50	44↓ (47%↓)
Income Requirements/Calculation	143	131	49	82↓ (63%↓)
Reasonable Accommodation	29	38	44	6↑ (16%↑)
Processor Error	23	36	34	2↓ (6%↓)
Benefit Takeover (BTO)	28	22	31	9↑ (41%↑)
Application Request	35	29	26	3↓ (10%↓)
Issue Unknown ^[2]	12	18	22	4↑ (22%↑)
Redetermination	41	23	18	5↓ (22%↓)
Major Capital Improvement	12	14	16	2↑ (14%↑)
Other Eligibility	32	15	16	1 ↑(7%↑)
Matters for HPD	16	17	10	7↓ (41%↓)
Apartment Regulatory Status	9	18	8	10↓ (56%↓)
Portability (Apartment Move)	10	9	7	2↓ (22%↓)
Housing Stability and Tenant Protection Act	23	16	6	10↓ (63%↓)
Age or Disability Requirements	1	3	5	2↑ (67%↑)
Income Spike	10	12	4	8↓ (67%↓)
Paperwork Received by DOF – Response Needed	52	4	0	4↓ (100%↓)

^[1] Because a single matter may fall under multiple issue categories, the aggregate sum of the per-category totals for a reporting year may exceed the total number of cases and inquiries for that year.

^[2] The “Issue Unknown” category counts incoming communications where no issue information was included in the initial inquiry and communications from the ombudspersons went unanswered.

The total number of cases and inquiries fell by 20% compared to the prior reporting period, returning to levels consistent with reporting periods prior to 2021. The ombudspersons attribute this decline in part to a campaign led jointly by the NYC Mayor’s Public Engagement Unit and

DOF's External Affairs team in early 2024. Detailed planning and cooperative use of data in this multi-agency effort helped close the gap among applicants who had failed to renew during the pandemic. This effort included both special outreach projects aimed at a larger audience and a large-scale initiative that emphasized direct contact with individual applicants. Internally, improvements in 311 response training and the application of some of the ombudspersons' previous recommendations added to the efficacy of the external initiatives. As the volume of calls regarding benefit reinstatement returns to normal levels, the ombudspersons' case focus shifted back to currently pending or recently denied applications, rather than reinstating benefits that had lapsed during the pandemic.

Questions related to "Income Requirement/Calculation" decreased by 63%, more than triple the overall 20% decline in total matters. This drop likely reflects the impact of the new income definition adopted by DOF in summer 2024, following an amendment to the Rent Freeze Program's governing law. The revised definition bases eligibility on adjusted gross income (AGI) from federal or New York state tax returns, with deductions for certain retirement account distributions. This simpler approach clarified what qualifies as income, reduced documentation requirements, and made it easier for applicants to complete the income section of the application. The change also appears to have contributed to the 49% decline in matters categorized under "Completing Application," aligning with prior reports that identified income documentation as the most common submission barrier. The redesigned SCRIE and DRIE applications, which now combine initial and renewal forms into a single, streamlined document also contributed to this improvement.

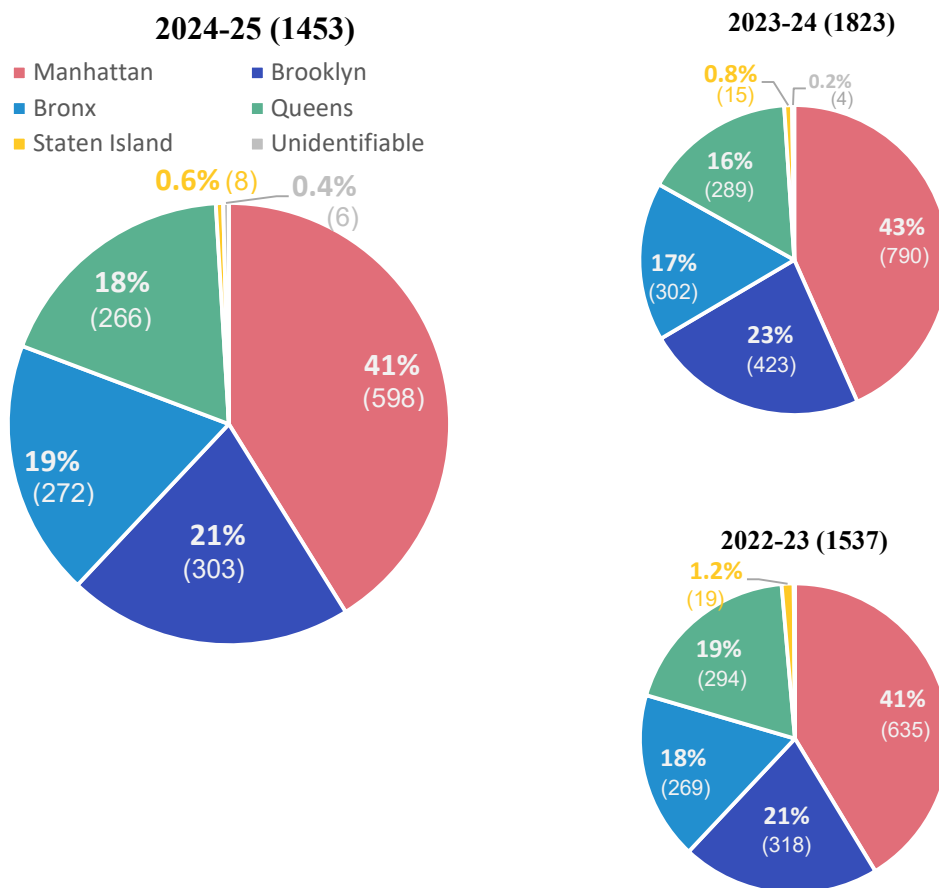
The ombudspersons also observed declines in landlord noncompliance matters (down 35%) and requests for Tenant Abatement Credit reports (down 42%), both exceeding the overall decline in total matters. A key factor in these improvements was the implementation of a prior-year recommendation to provide benefit history reports directly through TAP. Tenants can now access detailed information on the monthly tax abatements applied to their building and the dates of credit transfers to their unit. This transparency allows tenants to present accurate information to building management, reducing misunderstandings and limiting the need for DOF intervention.

Finally, matters related to the Rent Freeze Program's connection to New York State's Housing Stability and Tenant Protection Act fell by 63%, an encouraging trend. This may be due to an improvement in the application of frozen rent calculation rules for preferential rent tenants, which reduced confusion and the need for follow-up inquiries. Clearer internal guidance and more standardized procedures during the current reporting period likely contributed as well.

D. Cases and Inquiries by Borough

The chart below shows the breakdown of SCRIE and DRIE ombudsperson matters by borough. The distribution remains relatively in line with previous years and reflects the proportion of rent-regulated units in each borough. Manhattan continues to generate the highest number of matters, with Brooklyn second in total numbers. The number of matters in Staten Island remained significantly lower than the other boroughs, in accordance with its relatively low number of rent-regulated units.

Total Cases and Inquiries by Borough by Fiscal Year



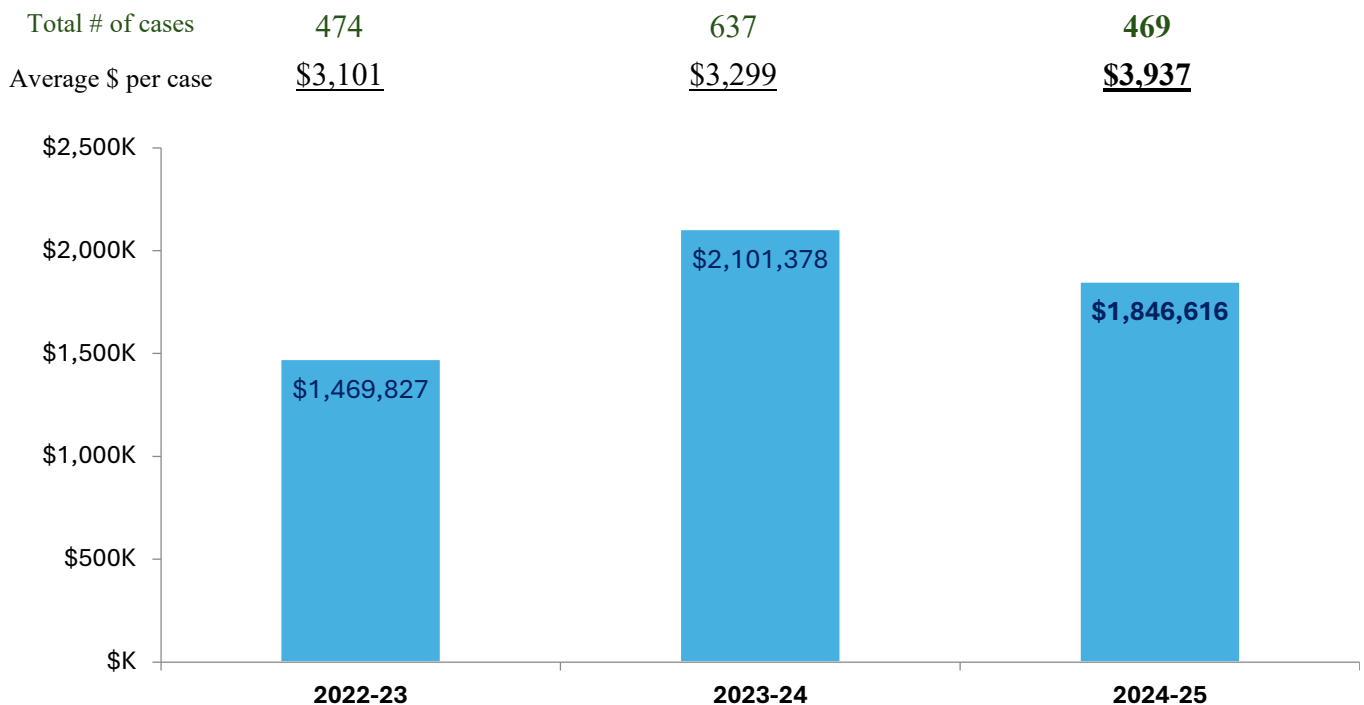
E. Dollar Impact of Ombudspersons' Work

The financial ramifications of the ombudspersons' work can be quantified via the tax abatement credits issued under the Rent Freeze Program. For this reporting year, the total monetary benefit conferred to SCRIE/DRIE tenants and landlords amounted to \$1,846,616, averaging \$3,937 per case.

Beyond this general trend, the ombudspersons believe that the relatively high dollar impact for the current fiscal year reflects a continuation in the high proportion of cases involving revoked benefits that were reinstated retroactively as part of the post-pandemic transition back to the normal processing timeline and, to a lesser degree, higher tax abatement credit amounts following the Rent Guidelines Board's 2022 and 2023 Apartment Orders regarding rent increases in lease renewals. The high total figure may also reflect the number of applications completed with the assistance of the ombudspersons due to the applicant's inability to access application assistance through the normal channels.

The following chart shows the dollar impact totals for the current and prior two reporting periods:

Ombudspersons' Dollar Impact by Reporting Year



Part IV: Ongoing Developments

A. Outreach and Training⁹

The ombudspersons' Rent Freeze outreach and training efforts this year continued the pace set in the prior reporting period and added new partnerships to existing relationships with internal and external stakeholders. A significant portion of the ombudspersons' informational outreach efforts were organized by DOF's External Affairs Division, whereas trainings were mainly arranged directly with the ombudspersons. Nearly all tenant outreach events were in-person, and attendance numbers were similar to the prior reporting period.

Notable events included:

- Information and enrollment events at senior centers with DOF's External Affairs Division
- Rent Freeze clinics at councilmember and assemblymember offices
- Consultation with tenants at Annual Westside Tenant's Conference hosted by Housing Conservation Coordinators
- Customized training session for PEU, including members of its Tenant Support Unit, at PEU's Manhattan office
- Trainings for CBOs, including pro bono legal and social work organizations, serving Rent Freeze clients
- Virtual conference with West Coast-based CBO to discuss the possibility of enacting Rent Freeze-type programs outside of New York State.

B. Forms Committee and TAP Renewals

Pursuant to last year's recommendation regarding application streamlining,¹⁰ the ombudspersons are involved in an ongoing DOF initiative focused on redesigning Rent Freeze materials for ease of tenant use and processing efficiency. To date, a team including personnel from OTA and the Property, Legal Affairs, and External Affairs divisions has redesigned the SCRIE and DRIE internal and renewal applications. The new application combines both the initial and renewal applications into one form. The team has compiled a tentative list of other Rent Freeze materials, including most SCRIE and DRIE forms, to be reviewed and redesigned, as necessary.

This reporting period also saw the rollout of new functionality in TAP that allows tenants to renew entirely online. Although some tenants find TAP to be inaccessible due to the lack of, or reluctance to use, a computer, many of the ombudspersons' CBO partners have assisted tenants with online applications. Some have reported possible glitches, including one affecting tenants

⁹ The ombudspersons' outreach efforts are also counted in the statistics reported in OTA's broader annual report.

¹⁰ See the 2023-24 "Application Streamlining" recommendation in Part VI (p. 29).

whose prior applications were denied.¹¹ These issues are forwarded to the Property Division, which in turn works with DOF's IT department to evaluate them.

C. Tenant Protection Cabinet

In April 2024, City Hall formed the Tenant Protection Cabinet to coordinate services, resources, and information across City agencies, including the Department of Finance, to better serve NYC renters. The Tenant Protection Cabinet's mission is to protect tenants from the negative impacts of the housing crisis by providing them with resources and information they need to remain safely in their homes. To achieve this mission, the Cabinet aims to coordinate communication and services across city agencies, develop new strategies to support tenants, and boost outreach with tenants and community-based organizations. OTA is currently represented at the Tenant Protection Cabinet by the Taxpayer Advocate, who has raised aspects of the Rent Freeze Program at the Cabinet's recurring meetings.

D. PEU "Benefits on Your Block" and Failure-to-Renew Collaboration

In July 2025, PEU launched "Benefits on Your Block," a weekend summer resource fair serving twelve priority neighborhoods across all five boroughs from July through September. The initiative brings a wide range of City services directly to New Yorkers, offering eligibility screenings, on-site enrollment assistance, and connections to essential programs. The ombudspersons are participating to help PEU screen potential Rent Freeze applicants and support accurate, efficient enrollment.

In addition, DOF shares lists of applicants who failed to renew their Rent Freeze benefits on time with the Mayor's Public Engagement Unit, enabling proactive and targeted outreach. This collaboration helps ensure that at-risk applicants have an opportunity to complete their renewal and maintain their benefits—even after a revocation.

E. Legislation

The following are legislative items passed or proposed during the reporting period and notable in relation to DOF's administration of the Rent Freeze Program:

1. Changes to Income Definition

As of July 1, 2024, the Rent Freeze Program implemented a new income calculation method based on an amendment to the program's governing law.¹² The new calculation method focuses on the tenant's adjusted gross income on their federal tax return, with deductions for certain types of retirement account distributions. For tenants who did not file a federal tax return, the income calculation will be based on the amounts that would have been reported on a federal return for that income year. The applicable law also provides that tenants whose Rent Freeze benefits began before July 1, 2024, may also be considered eligible under the prior income

¹¹ See discussion in recommendation II.B.4 (p. 1111).

¹² NY Real Property Tax Law 467-b(1)(c)

calculation method if the prior method results in a lower total household income than the new method.

2. Rule Language Regarding Annual Retirement Benefit Increases

The New York City Rent Freeze rules provide that annual increases in benefits under the Social Security Act or a public or private pension that take effect after the start of a tenant's benefit will be excluded from that tenant's income calculation if the increase does not exceed the average consumer price index (CPI) for that year. The prior version of the rules provided illustrations of the application of this rule for each year from 2016 through 2020 based on the actual CPI for those years, as well as stating that DOF would post on its website the years for which the application of this rule would result in an exclusion of that year's benefit increase. A new DOF rule deletes the statement regarding website posting as well as the illustrations and explanations.

For purposes of NYC Rent Freeze operations as of July 2024, this exclusion rule only applies to the calculation of income for 1) all applications submitted to DOF prior to July 1, 2024 and 2) applications submitted on or after July 1, 2024, by tenants whose benefits began prior to that date and whose total household income would be lower under the income definition in effect prior to DOF's application of the amended definition described above.

3. Notable Proposals in the New York State Legislature's 2025-26 Session

(a) Higher Income Limit and Annual Consumer Price Index Adjustment

The Rent Freeze income ceiling is fixed by law at \$50,000,¹³ an amount reflecting an increase in 2014 from the previous ceiling of \$29,000. Each New York State legislative session for the past several years, including the current session, has included proposals to increase that income ceiling or otherwise alter the income calculation to allow more tenants to qualify for the program.¹⁴ One bill currently under consideration raises the ceiling to \$67,000 and, more crucially, provides for a yearly adjustment equal to the increase in the consumer price index.¹⁵ Other proposals leave the ceiling at \$50,000 but would result in a lower income calculation for the tenant by either excluding a source of income that is currently included, such as veterans' and workers' compensation benefits and increases to pension or Social Security benefits, or allowing additional deductions from income, such as union dues and business losses, which are currently unrecognized in Rent Freeze income calculations.¹⁶

¹³ The statutory provision setting forth the \$50,000 maximum income must be reapproved periodically and is currently effective through June 30, 2026. If the provision is allowed to lapse, the income ceiling reverts to \$29,000. (NY Real Property Tax Law § 467-b(3))

¹⁴ For example, S1764/A1805 proposes a 50% increase in the income limit, raising it to \$75,000.

¹⁵ S1457A/A5344.

¹⁶ A.792 (veterans' and workers' compensation benefits); S6473/A2082 (increases to pension or Social Security benefits); S6472/A1946 (union dues and business losses).

(b) Income-Based Frozen Rent Calculation

Bill S2451A/A7729 seeks to repurpose the one-third rule to become an affordability safeguard, rather than simply a restriction of the benefit amount.¹⁷ If enacted, this legislation would cap frozen rent at one-third of a tenant's monthly household income, thereby giving the tenant a greater chance of meeting the costs of other basic necessities.

(c) Notification Requirements

Bill S561A/A1863 aims to enhance tenant awareness by mandating periodic notifications about the program, particularly in conjunction with events that affect rental rates. Should this legislation be enacted, both City and State agencies, as well as landlords operating under housing laws, would be required to include information on potential eligibility for the program in specific tenant communications. Similarly, Bill S3742A/A1563 expands the Rent Freeze eligibility notice obligations applicable to landlords from the current annual and new tenant notice requirements to require notices in all rent bills and leases, including renewals.

(d) Language Services

Bill S5280/A824 would require municipalities to provide language assistance to Rent Freeze participants, including translation of documents into the six most common non-English languages (per municipality), interpretive services upon request, and assistive services upon request or demonstration of need by individuals with physical or cognitive impairments. While the City has its own existing language requirements, these bills would fill numerous gaps remaining in language accessibility throughout the Rent Freeze process.

(e) Two-Year "Income Spike"

Bill S4252 introduces a two-year grace period during which tenants removed from the program due to income ineligibility can regain their previous frozen rent amount if reapproved as initial applicants. Under the current framework, the window for reapplication is limited to one calendar year post-revocation. The one-year window locks out tenants who experience abnormal income increases—such as those related to seasonal work—that span multiple calendar years, thereby disqualifying them from reverting to their former frozen rent amounts when their income normalizes. Extending the reapplication period to two years would afford tenants the opportunity to retain the intended benefits of the existing legislative framework by reverting to their prior rent levels, depending on their income level upon reapplication.

(f) Program Expansion Based on Rent-to-Income Ratio

With the goal of providing relief to low-income New Yorkers whose financial circumstances are severely constrained due to housing costs, Bill S1805/A1877 would expand program eligibility to any New York City tenant living in a rent regulated apartment and paying at least 50% in household income toward rent, regardless of age or disability status. Per the bill's proposal, 10% of the tax revenue lost by the City would be reimbursed by New York State.

¹⁷ See recommendation II.A.1 (p. 5) for a description of the one-third rule.

(g) Change in Redetermination Requirements

In addition to potentially capping frozen rents based on income, Bill S5548/A4332 would eliminate the current requirement that a tenant demonstrate a permanent loss of at least 20% in income to qualify for a redetermination. Instead, tenants would be allowed to request a redetermination based on any permanent decrease in income.

Part V: Success Stories

Assisting in a Tenant's Struggle Against Parkinson's Disease

In 2022, the DRIE Ombudsperson helped a tenant complete his application. At that time, the tenant promptly provided the necessary documents to resolve a minor misunderstanding and was approved for the program, protecting him from the risk of homelessness.

Recently, the DRIE Ombudsperson was contacted by a nonprofit specializing in tenant-landlord disputes, seeking confirmation of the tenant's Rent Freeze benefit to assist in an eviction case. The tenant, who had no family support, was struggling with early-onset Parkinson's disease. In addition to short-term memory loss, he experienced severe coordination and mobility challenges. As a result, he was unable to complete his renewal application, lost his DRIE benefit, and missed the appeal deadline.

The ombudsperson worked with the tenant's representative, the EEO office, and the Senior and Disabled Programs Unit (SDP) to secure an accommodation for his medical condition. Through effective interdepartmental collaboration, DOF reinstated his DRIE benefit in less than a month, restoring \$3,689 in TAC benefits.

Preventing an Applicant from Opening Old Wounds

While completing his initial DRIE application, a tenant faced a difficult dilemma: should he reach out to his former partner?

Applicants must provide both prior and current leases so that DOF can calculate the correct frozen rent and identify household members. The applicant submitted a prior lease listing his former partner, who was not named on the current lease. Processing staff requested proof of the partner's departure, typically an updated driver's license or new lease. The applicant, however, had no such documents and was deeply uncomfortable with the idea that he might need to contact his former partner to qualify for DRIE. Efforts to find alternatives through 311 were unsuccessful.

When the tenant contacted OTA, the DRIE Ombudsperson worked with him to identify other forms of proof. Ultimately, a letter from building management confirmed that the partner had moved out, eliminating the need for direct communication. After the ombudsperson presented the circumstances, SDP accepted the alternative documentation and completed the application, providing \$720.24 in TAC benefits.

Erasing Four Years of Arrears by Investigating Unusual Income

In April 2025, a landlord's representative contacted the SCRIE Ombudsperson after a tenant's 2021 renewal application was denied—nearly four years later—for exceeding the income limit. Until then, the tenant had received no correspondence beyond the initial acknowledgment letter, and the landlord had continued billing only the frozen rent, assuming the renewal had been approved. The landlord warned that unless the revocation was removed, he would need to charge the tenant thousands in arrears immediately.

The ombudsperson first considered whether a late “income spike” application might apply, but also felt that, although the chances were low, it would be worth checking whether the income-based denial was mistaken. If the denial was incorrect, the revocation would be invalidated, and the tenant could be reinstated as if there had been no break in the benefit.

Starting with the year of revocation, the ombudsperson reviewed the tenant’s prior document submissions and noticed that the stated total for pensions and annuities on the 2020 federal return was more than twice what was stated on the tenant’s sole 2020 Form 1099-R, which reflected his NYCERS retirement benefits. The ombudsperson asked the tenant whether he might have inadvertently omitted a Form 1099-R reflecting additional 2020 retirement income. The tenant stated that he had for years had only two sources of income: Social Security benefits and his NYCERS pension. He had not prepared his taxes himself and was surprised at the high figure for pensions and annuities in 2020, since there had always been only incremental changes from year to year. The tenant was certain that the higher figure was a mistake, but could think of no way to prove it.

The ombudsperson asked whether the tenant could contact the volunteer organization that prepared his 2020 taxes to see if their records might contain the reason for the anomaly. Upon contacting the organization, the tenant learned that the volunteer who had prepared his taxes had since passed away. As the volunteer organization had no additional information, the ombudsperson needed other evidence to show that the 2020 pension figure was incorrect. The ombudsperson asked the tenant to provide any supplemental income documentation for the years 2021 to 2024 and compared these to the earlier income years already recorded by DOF. This review confirmed that the tenant did in fact have only two sources of income from 2018 to 2022, with the pension amounts increasing steadily by about \$200 each year. The only exception was the unusually high pension income reported on the 2020 return.

On the assumption that the figure in the 2020 Form 1099-R was correct, the ombudsperson revisited the other income documents to see whether there was an obvious basis for the additional \$28,654 in reported pension income. The ombudsperson found that \$28,654 was the exact amount of the pension income reported on a Form 1099-R for a different income year; the tax preparer had apparently reported the income from two separate years on a single return.

The ombudsperson presented this evidence to SDP, which reversed the denial. This correction prevented the landlord from demanding approximately \$5,500 in arrears and safeguarded the tenant from eviction.

Deeper Guidance Regarding Income Rules Leads to Tenant’s Reinstatement

At a Rent Freeze Program enrollment event, a tenant approached the SCRIE Ombudsperson after waiting more than three months for a response to her appeal of an income-based renewal denial. The ombudsperson confirmed that the appeal had already been denied internally but that the tenant had never received notice.

Reviewing her documents, the ombudsperson initially found the denial consistent with program rules: her income exceeded the limit. The tenant, however, insisted that her actual resources were far lower than what she reported in her application. The ombudsperson explained that the program uses the prior calendar year's income and asked whether the tenant had informed SCRIE of her retirement during that year, as program regulations allow pre-retirement wages earned in the year of retirement to be excluded from the calculation. The tenant confirmed that she had retired, but had not reported it, and none of the organizations she had consulted had advised her of this option.

With the ombudsperson's guidance, the tenant gathered documentation of her permanent retirement date. After the ombudsperson forwarded this to SDP with an explanation, SDP recalculated her income, reinstated her SCRIE benefit, and restored nearly \$5,000 in rent savings for her current lease term. Without this correction, she would have been unable to afford her rent.

Part VI: DOF Actions on Prior Recommendations

The following entries describe the status of recommendations made by the ombudspersons in the prior fiscal year's annual report. Italics in this section indicate the text of recommendations as they appeared in the prior annual report.

2023-2024: Enhanced 311 SCRIE-DRIE Application Lookup

Recommendation: DOF should make additional information, such as information regarding pre-processing document queue status, available within the 311-lookup tool already being used by 311 operators to provide status information to Rent Freeze participants.

DOF Action: DOF is currently working to improve the 311 Rent Freeze application lookup tool.

2023-2024: Auto-Response Email

Recommendation: The relevant business units should review the response templates available in CRM for suitability to the most common customer inquiries and document submissions. DOF should establish a CRM software training program that includes instructions on how to avoid triggering "case closed" emails unless a matter has been handled completely.

DOF Action: The Finance and Information Technology Division (FIT) has provided guidance to CRM users to prevent this error, though it has not been eliminated completely. FIT is currently developing a broader CRM training program that may further address this issue.

2023-2024: Benefit History via Tenant Access Portal (TAP)

Recommendation: A full benefit history, including frozen rent and landlord credit amounts for each prior lease period, should be available to tenants and their designated representatives through the Tenant Access Portal.

DOF Action: DOF successfully implemented this recommendation. Benefit details and TAC reports are available and can be downloaded.

2023-2024: Appeals

Recommendation: The unit within the Property Division that reviews appeals should standardize the steps and timeline taken in processing applications (in a manner similar to initial and renewal application processing). The timeline should include uploading submissions to the online document repository within a reasonable time following receipt, logging processing notes in the applicable DOF database, and sending notices to applicants. Certain information from the internal appeals documentation system, including date of receipt, processing status and outcome, should be accessible to tenants online, possibly through TAP.

DOF Action: DOF is working on this project and is expected to complete it by the end of 2025.

2022-23: Standardization

Recommendation: DOF should establish a standardized protocol for all personnel responding to SCRIE or DRIE status inquiries, which includes:

- I. Defining the components of a complete response to an application status request and determining the scope of response available through a 311 call.*
- II. Identifying a standard set of minimum inputs required from participants to check their status.*
- III. Implementing a mechanism allowing staff to confirm, within a few days of physical receipt, whether a document or any form of transmission has been received by SCRIE and entered into the review queue.*
- IV. Specifying the level of access to information/documents needed for personnel to examine submitted materials and cross-reference them with processors' notes in the application system.*

DOF Action: DOF is actively working to improve the standardized protocol for handling SCRIE and DRIE status inquiries. This includes ensuring consistency in internal staff instructions and external customer communications, with a unified tone and messaging. As part of these improvements, DOF has arranged with its third-party vendor to bring initial applications into the workstream already in place for renewal applications and other program forms. This change in the processing of initial applications helps to streamline the review process, reduce the number of inquiries related to application status, and allow authorized DOF personnel to provide more timely and accurate information regarding initial application status.

2022-23: Capacity and Wait Times

(A) Dedicated Status Response Inquiry Page

Recommendation: DOF should create a web inquiry page and/or email address exclusively for handling application status inquiries to improve response times and quality of service.

DOF Action: At the present time, DOF intends to focus on providing responses to inquiries via its existing CRM system. OTA will discuss with the Property Division whether CRM can and should be configured to disaggregate status inquiries to be handled by specific staff or on a separate timeline.¹⁸

(B) Chatbot

Recommendation: DOF should resume its investigation into the viability, implementation timeline, and associated costs of incorporating a chatbot and/or voicebot, aiming for seamless integration with other customer service improvements.

¹⁸ While the ombudspersons continue to recommend other changes to the CRM inquiry system to improve status inquiry responses, preventing the submission of application documents via CRM, per recommendation B.2 (p. 10), should alleviate some of the delays in the existing CRM system.

DOF Action: Although Rent Freeze applications are still pending, a DOF chatbot is currently in its pilot stage and a voicebot solution is in progress for a number of other areas within DOF. DOF is considering expanding these projects to include the Rent Freeze Program.

(C) MyCity Portal

Recommendation: DOF should continue to work towards integrating all Rent Freeze application procedures, benefit details, and online submission interfaces into the MyCity Portal for comprehensive, user-friendly access.

DOF Action: DOF has contributed to efforts to integrate DOF programs into the MyCity Portal. The project is ongoing.

2022-23: Improvements to Forms and Other Program Materials

(A) Application Streamlining

Recommendation: DOF should conduct a comprehensive review of the design and content of Rent Freeze applications, particularly the initial and renewal applications, emphasizing changes aimed at enhancing successful entry and renewal rates within the program. Moreover, DOF should explore other Rent Freeze application process simplifications, such as expanding the use of streamlined application forms like the existing short-form renewal.

DOF Action: DOF has established a multidivisional team dedicated to reviewing and redesigning Rent Freeze materials, including applications and references, such as the frequently asked questions (FAQ) section. The team's newly streamlined Rent Freeze application, which has been posted online and has replaced the prior version in all DOF mailings, can be used for both initial and renewal applications and includes a revised FAQ document. The participating divisions continue to work collaboratively toward revising and creating Rent Freeze forms.

(B) External Requests for Rent Freeze Materials

Recommendation: Building upon the initial steps taken by its External Affairs Division, DOF should institute and prominently feature on its website a streamlined procedure for external partners to obtain Rent Freeze Program materials for distribution within their organizations.

DOF Action: DOF is assessing whether an enhancement to the website is needed for handling external requests for Rent Freeze materials. Meanwhile, DOF is coordinating with other City agencies, such as the Department for the Aging, to optimize the distribution process, ensuring full integration of resources and comprehensive support across all channels.

(C) Site Guidance for Tenant Access Portal

Recommendations: To improve the user experience, DOF should incorporate visual aids and simple, step-by-step instructions directly within the TAP interface. This will make the process more manageable for individuals who may struggle with online navigation. In addition, DOF should explore options that would establish support specifically for TAP and other online submissions. This support should be equipped to handle a range of technical issues, ensuring that users can easily resolve any challenges they encounter while using the portal.

DOF Action: DOF agrees with this recommendation and is exploring solutions for implementation.

(D) Adaptations for Visual Impairments

Recommendation: DOF should actively investigate methods to further enhance the accessibility of the Rent Freeze Program application process for individuals with a range of visual impairments.

DOF Action: In connection with a DOF website overhaul, OTA spoke with internal partners who made improvements to Rent Freeze webpages pursuant to this recommendation. OTA plans to continue these discussions with DOF personnel, including user experience and user interface designers, to further enhance website accessibility.

2022-23: Early Notification of Program Features

Recommendation: Alongside each initial SCRIE/DRIE approval letter and benefit takeover approval letter, DOF should include a “welcome packet” that clearly and concisely lists key features of the Rent Freeze Program, emphasizing those aspects that are time-sensitive. This approach will equip tenants with the necessary knowledge to fully benefit from the program.

DOF Action: OTA and its internal partners are developing a Rent Freeze “welcome packet” in connection with a larger Rent Freeze materials overhaul.

2022-23: Procedure for DOF-HPD Rent Freeze Issues

Recommendation: DOF should revise its current denial letter to applicants who live in housing types where SCRIE is administered by HPD. DOF should also collaborate with HPD to establish a standard referral system.

DOF Action: DOF is working to revise the denial letter to more clearly instruct applicants living in HPD buildings that they can apply with HPD. Furthermore, DOF is exploring potential solutions for a referral system, such as a secure portal and other methods to improve data exchange.

2022-23: Applied Artificial Intelligence

Recommendation: To take advantage of AI’s potential, DOF should form a multi-unit working group focused on identifying and implementing AI applications within the Rent Freeze Program. This group should involve personnel with expertise in technology, customer service, and program management, ensuring a comprehensive approach to integrating AI. The group can begin by identifying immediate areas where AI can offer quick wins and proceed to develop a long-term strategy for its implementation, affecting both customer interaction and internal operations.

DOF Action: DOF is evaluating divisional needs and identifying measurable outcomes prior to implementing AI solutions to the Rent Freeze Program.

APPENDIX I

Ombudspersons' Case and Inquiry Dollar Impact by City Council District

District/ Council Member	Number of Inquiries				Number of Cases				\$ Impact*			
	FY2022	FY2023	FY2024	FY2025	FY2022	FY2023	FY2024	FY2025	FY2022	FY2023	FY2024	FY2025
1 C. Marte	13	28	36	21	9	11	17	16	\$18,308	\$8,854	\$55,777	\$55,070
2 C. Rivera	15	38	45	30	6	10	18	8	\$16,029	\$16,957	\$57,433	\$16,317
3 E. Bottcher	35	56	66	48	23	28	29	29	\$57,477	\$97,456	\$87,513	\$126,723
4 K. Powers	15	46	39	26	13	14	30	15	\$39,496	\$58,108	\$180,518	\$112,950
5 J. Menin	13	28	37	30	8	18	19	15	\$906	\$57,166	\$62,460	\$63,103
6 G. Brewer	30	40	55	40	20	26	43	14	\$16,309	\$79,030	\$122,749	\$45,901
7 S. Abreu	28	60	52	44	24	30	27	20	\$47,988	\$99,452	\$95,717	\$156,515
8 D. Ayala	8	15	13	19	3	7	13	6	\$2,272	\$14,776	\$27,971	\$15,056
9 Y. Salaam	19	31	34	26	7	8	19	10	\$5,016	\$11,784	\$33,373	\$17,315
10 C. De La Rosa	51	92	114	85	36	39	69	64	\$106,196	\$136,650	\$351,469	\$252,433
11 E. Dinowitz	15	31	27	29	13	14	9	16	\$14,950	\$54,932	\$23,774	\$57,958
12 K. Riley	6	20	19	9	4	7	2	5	\$23,931	\$7,137	\$0*	\$4,601
13 K. Marmorato	7	12	16	5	7	9	8	7	\$20,436	\$11,192	\$16,534	\$21,755
14 P. Sanchez	19	30	52	38	13	15	20	14	\$49,735	\$58,555	\$74,892	\$69,767
15 O. Feliz	13	34	27	25	10	8	20	10	\$7,544	\$25,380	\$32,841	\$55,555
16 A. Stevens	22	18	24	36	20	11	19	16	\$17,118	\$29,152	\$14,184	\$57,878
17 R. Salamanca Jr.	7	16	14	10	6	7	7	11	\$2,328	\$27,617	\$29,053	\$23,522
18 A. Farías	7	12	9	23	5	4	4	5	\$19,577	\$5,600	\$953	\$25,641
19 V. Paladino	1	5	8	5	0	4	2	2	\$0	\$32,862	\$7,372	\$7,180
20 S. Ung	16	25	27	20	28	17	15	21	\$108,184	\$85,789	\$54,130	\$98,395
21 F. Moya	7	10	6	18	3	3	12	6	\$1,524	\$16,116	\$10,158	\$2,302
22 T. Cabán	7	10	19	14	5	7	9	9	\$15,639	\$7,596	\$12,816	\$11,938
23 L. Lee	6	3	17	6	6	6	3	5	\$684	\$1,329	\$28,647	\$78,944
24 J. Gennaro	7	23	15	13	4	7	9	2	\$15,736	\$24,008	\$34,916	\$14,653
25 S. Krishnan	7	30	20	15	10	14	16	9	\$11,391	\$97,184	\$66,455	\$40,087
26 J. Won	7	14	16	18	12	8	19	16	\$38,477	\$8,801	\$66,473	\$29,650
27 N. Williams	4	9	11	8	5	10	6	5	\$5,547	\$14,987	\$18,690	\$43,797
28 A. Adams	1	0	1	3	0	0	0	0	\$0	\$0	\$0	\$0
29 L. Schulman	19	33	20	20	17	11	5	6	\$52,478	\$84,772	\$33,366	\$23,564
30 R. Holden	2	7	0	7	1	3	2	5	\$543	\$2,326	\$7,285	\$24,436
31 S. Brooks-Powers	6	5	1	4	2	1	3	3	\$0	\$338	\$11,970	\$7,038
32 J. Ariola	4	6	7	10	2	3	2	6	\$6,427	\$7,007	\$145	\$14,283
33 L. Restler	4	11	15	17	5	10	6	4	\$19,923	\$18,086	\$7,755	\$15,499

District/ Council Member	Number of Inquiries				Number of Cases				\$ Impact*			
	FY2022	FY2023	FY2024	FY2025	FY2022	FY2023	FY2024	FY2025	FY2022	FY2023	FY2024	FY2025
34 J. Gutiérrez	7	13	21	16	2	7	8	5	\$0	\$8,650	\$24,404	\$39,997
35 C. Hudson	11	16	30	29	5	12	17	9	\$4,748	\$8,777	\$53,993	\$25,764
36 C. Ossé	2	7	12	10	1	2	4	3	\$229	\$778	\$6,857	\$14,545
37 S. Nurse	3	4	6	4	2	4	5	1	\$3,853	\$749	\$12,458	\$3,112
38 A. Avilés	8	6	10	4	1	4	4	2	\$486	\$728	\$35,150	\$26,026
39 S. Hanif	9	11	22	8	10	5	12	9	\$39,750	\$8,516	\$71,435	\$28,611
40 R. Joseph	21	45	46	22	12	15	34	11	\$17,343	\$46,974	\$97,251	\$30,003
41 D. Mealy	9	16	12	15	11	3	6	8	\$15,270	\$1,858	\$4,974	\$9,619
42 C. Banks	6	10	5	4	2	3	4	2	\$0	\$14,749	\$3,782	\$2,193
43 S. Zhuang	13	14	29	10	10	8	27	4	\$12,815	\$18,006	\$95,717	\$28,969
44 S. Felder	6	19	14	13	3	6	6	4	\$6,808	\$59,960	\$25,026	\$4,184
45 F. Louis	9	11	14	15	6	8	5	8	\$6,372	\$31,708	\$5,753	\$16,986
46 M. Narcisse	4	3	4	5	1	0	0	0	\$0	\$0	\$0	\$0
47 J. Brannan	10	9	5	19	3	2	3	5	\$14,945	\$9,134	\$574	\$16,523
48 I. Vernikov	14	23	34	22	5	7	8	11	\$8,704	\$40,499	\$34,051	\$47,642
49 K. Hanks	4	5	6	3	1	6	1	1	\$0	\$8,614	\$1,314	\$539
50 D. Carr	0	3	6	2	1	5	2	1	\$0	\$9,129	\$1,250	\$0
51 F. Morano	0	0	0	1	0	0	0	0	\$0	\$0	\$0	\$0
N/A**	27	50	48	60	8	7	9	5	\$0	\$0	\$0	\$0
Total	584	1063	1186	984	411	474	637	469	\$873,490	\$1,469,827	\$2,101,378	\$1,884,538

*Because dollar impact is calculated according to increases in tax abatement credit, matters that do not implicate a change in the tax abatement credit amount (e.g., a renewal without a rent increase) can result in a \$0 dollar impact even if successfully resolved.

**Inquiries from persons outside of the five boroughs or where the tenant's address was not provided were categorized as "N/A" for purposes of this chart.

APPENDIX II

Glossary of Terms

Appeal: A request, which may be submitted on the DOF Application for Appeal, for reconsideration of a DOF determination. Most often, appeals ask for reexamination of denied Rent Freeze applications or revoked Rent Freeze benefits.

Benefit Takeover Application: An application to take over the benefit of a Rent Freeze Program beneficiary who has died or permanently vacated the apartment.

CBO: Community-based organization.

CRM: DOF's internal customer relations management software system.

DHCR: The New York State Division of Homes & Community Renewal.

DOF: The New York City Department of Finance.

FIT: Finance Information Technology, DOF's IT division, is in charge of electronic applications for property collections and accounting; tax policy, audit, and assessment; and parking and payment; as well as systems modernization and network operations.

Frozen Rent: The amount of reduced rent, set in accordance with the applicable Rent Freeze Program laws, that the tenant must pay to the landlord.

HSTPA: The New York State Housing Stability and Tenant Protection Act of 2019.

Legal Rent: The maximum rent that a landlord can charge a tenant for a rent-regulated unit according to applicable law.

MCI: Major capital improvement. Authorization of an MCI by DHCR generally includes a rent increase to compensate a landlord for the cost of building-wide renovations.

Preferential Rent: DHCR defines "preferential rent" as a rent that an owner agrees to charge that is lower than the legal regulated rent the owner could lawfully collect.

Reasonable Accommodation: In the context of DOF programs, a reasonable accommodation is a modification or adjustment to program requirements that is necessary for an applicant or program participant with an impairment to apply for or participate in the program. For Rent Freeze applicants, the most common requests involve an extension of time given as a reasonable accommodation for a person with an impairment to complete the renewal process. Applications for reasonable accommodation are referred to the Department of Finance's disability service facilitator in its Office of Equal Employment Opportunity.

Redetermination: An adjustment to a tenant's frozen rent amount after a permanent loss of 20% or more of the tenant's combined household income as compared to the income reported in the tenant's last approved application. In order to be considered for a redetermination, a tenant must

submit a redetermination application to the Rent Freeze Program or request a redetermination review in the designated area on a benefit takeover application.

SDP Unit: The Senior and Disabled Programs Unit within DOF's Property Division. The SDP Unit is responsible for administering the Rent Freeze Program and certain other tax benefits.

TAC (Tax Abatement Credit): The amount credited on a landlord's property tax bill in accordance with the Rent Freeze Program.

Tenant Representative: A person designated in writing by a tenant to receive copies of all SCRIE or DRIE notices sent to the tenant. A tenant representative can assist the tenant with the application process.