



**Testimony of Marricka Scott-McFadden, Deputy Commissioner for Intergovernmental and Legislative Affairs  
New York City Department of Social Services**

**Before the New York City Council, Committee on General Welfare  
September 13, 2022**

Good morning, I want to thank the General Welfare Committee and Deputy Speaker Ayala for holding today's hearing and the opportunity to testify.

My name is Marricka Scott-McFadden and I am the Deputy Commissioner for Intergovernmental and Legislative Affairs at the Department of Social Services (DSS). I am joined by Molly Park, First Deputy Commissioner at the Department of Homeless Services.

Today's hearing will focus on several bills impacting DSS, the Human Resources Administration (HRA) and the Department of Homeless Services (DHS). We look forward to discussing these proposals today and better understanding their intent. Before we start, I want to emphasize that it is our priority to ensure clients have access to the services that they need, however, many of these proposals are duplicative. We ask that this Committee seriously consider the cost, programmatic and staffing impacts these bills would have on our system as we discuss them today, and to keep in mind the many reforms we've implemented to better serve New Yorkers in need. Moreover, several of these bills are still being reviewed by our legal teams. With that in mind, we look forward to today's conversation.

**Intro. 522:**

Introduction 522 would require mental health professionals to be made available in families with children shelters and for DHS to report on the provision of such services. While the intent seems helpful, we have several concerns about this proposal. First, implementing the bill would be extremely costly as it requires hiring a significant number of mental health professionals. Additionally, given recent national shortages of mental health professionals, it could be difficult to comply with the bill's requirements at any price point. In addition, DHS already provides social work professionals in family shelters as part of the shelter model budget. These professionals conduct biopsychosocial evaluations and make referrals to other professionals when appropriate. Most importantly, given that families will be transitioning from shelter, it would also be more effective to refer them to services in the community. Lastly, the reporting requirements would be burdensome to the agency given the absence of resources included in the legislation. We look forward to speaking with the sponsor to further discuss these proposals.

**Introductions 132 and 513:**

The ideas in Introductions 132 and 513 would present tremendous challenges for the agency. Intro. 132 would require DHS to establish additional intake centers for families with children in boroughs without existing intake centers. As last stated by our Commissioner to this Committee, this proposal would have significant costs to the City – an important factor that this bill fails to thoroughly consider. DHS opened the Prevention Assistance and Temporary Housing (PATH) intake facility after revamping its intake and eligibility protocol to improve and expedite the processing of applications and provision of conditional placements for families into temporary emergency housing.

Our centralized shelter intake was specifically designed and built for families with children and allows for consistent screening of critical factors and assessment for conditions related to medical needs, mental health, substance use, adult and child protective services and domestic violence (a significant issue in the families with children population). Moreover, centralization fosters the continuity of services by utilizing interagency linkages such as with the Department of Education, Administration for Children’s Services and others. Decentralizing the intake process loses the economies of scale built over time, dilutes the safeguards in place for vulnerable families and will slow the process of placing families in shelter.

Related to shelter intake, Intro. 513 would require DHS to report on the feasibility of partnering with community-based nonprofit organizations to accept and process application for shelter intake for families with children. We have several concerns about the proposals in this bill. As noted above, there are significant service benefits from a consolidated intake process. In addition, devolving such a critical and meticulous process to community organizations could result in families receiving inconsistent services. Lastly, there could be client privacy and quality of service concerns, factors that would take substantial resources and funding to oversee and execute by DHS.

**Intro. 92:**

Introduction 92 would require DHS to create an accessibility advisory board on issues related to accessibility in City shelters. Our agency has concerns regarding this proposal as accessibility is currently governed by the Butler consent decree and DHS is following this process. We look forward to discussing with the sponsor to understand the intent of this bill.

**Intro. 190:**

Introduction 190 would require DHS to produce a homeless bill of rights to inform New Yorkers experiencing homelessness about their rights and services available to them. DHS already ensures our clients experiencing homelessness are aware of services available to them and their rights, and we work to communicate this at several touchpoints across our system. We are open to the bill’s proposals, and we look forward to working with the sponsor to explore implementation.

**Introductions 431 and 276:**

Introductions 431 and 276 would require DHS to conduct customer service training and report on this training. The requirements in these two bills are duplicative, as they present similar training topics. DHS conducts a series of foundational courses focused on client engagement to ensure

our staff and providers provide New Yorkers with the upmost care, compassion and professionalism. We look forward to working with the sponsors to further understand these proposals.

**Introductions 421 and 108:**

Introductions 421 and 108 would introduce new reporting requirements for DSS-DHS. As previously mentioned to the Council, we value the importance of transparency and accountability that our agency reporting brings to our discussions with the Council and public. However, we want to emphasize the significant costs and resources it takes to produce reports, which is why we want to stress the importance of streamlining reporting requirements to avoid duplication and wasted resources.

With that said, we have significant concerns about both reporting bills. Introduction 421 would require an onerous amount of reporting regarding our families with children shelter population. First, the reporting requirements duplicates some of the reporting requirements of the revamped Local Law 37 of 2011 (as amended by Local Law 79 of 2022). Moreover, some of the level and granularity of data being requested by this bill does not exist so it would create administrative burden on the agency. The bill also requires data coordination with other City agencies such as the Department of Education and Administration for Children Services, which raises privacy concerns about confidential information particularly for minors and the requirement for parental consent. The monthly reporting requirements are unrealistic given the concerns just mentioned.

Introduction 108 requires reporting that would be duplicative of existing metrics provided by the agency and administratively burdensome to carry out in the manner proposed by the bill. We look forward to further understanding the intent of this bill with the sponsor.

**Intro. 124:**

Introduction 124 is in relation to designating housing specialists in HRA and DHS shelters. DSS-HRA-DHS staff and providers work each day to transition and place New Yorkers in need into permanent housing, and this critical work is done through the many case workers and housing staff embedded throughout our HRA and DHS shelters, or who visit the sites regularly. All DHS shelters are already funded to provide housing specialists on-site as part of the model budget. Given this, we find that the requirements of this bill would be duplicative of our current work and cost considerations must be taken into account for any additional requirements placed on the agencies. We look forward to further understanding the bill's intent.

**Intro. 229:**

Introduction 229 is in relation to monthly rental assistance payments for households with rental assistance vouchers. We believe that the Council intends to protect tenants but we have significant concerns about the drafting of this bill, as we believe it could actually be harmful to tenants for several reasons. CityFHEPS, like Section 8, is based on the Fair Market Rent, which is the maximum the program can pay if all utilities are covered in the rent. If the agency is forced to pay the landlords the full rent regardless of what utilities they offer – and in most NYC rental units the tenant is responsible for paying utilities – then we will not be able to subsidize the cost of utilities for tenants. When DSS has finished building in modifications to our subsidy payment system, we intend to ensure that the utility allowance is provided to the tenant, either as part of

the public assistance benefit or as a reduction in their rent contribution. We would not be able to pass the utility allowance to the tenants who pay for their own utilities because it would have been provided to the landlord. Additionally, we are finally at a place where all City subsidies are mostly aligned with each other and landlords cannot discriminate between voucher holders. If CityFHEPS does not deduct a utility allowance from the landlord, EHV and Section 8 voucher holders will have a more difficult time securing housing. We believe we share the same goal and look forward to discussing further with the Council.

We appreciate the opportunity to provide feedback on these proposals and we look forward to working with the Council to serve New Yorkers in need. Thank you and I look forward to any questions you may have today.