

Promoting Access to Stable, Permanent Housing for All New Yorkers

Reentry Housing in New York

There are very few housing resources for persons exiting the criminal justice system in New York. Moreover, many of these individuals will require affordable housing and supportive services in order to maintain stability. The lack of suitable housing resources puts the over 90 thousand New Yorkers exiting New York prisons and jails annually at a high risk of homelessness and recidivism. Supportive housing is a proven, cost-effective vehicle for stopping the revolving door of homelessness, incarceration, and crisis service use. Through a combination of affordable housing and integrated supportive services, supportive housing ensures that people with long histories of homelessness who face persistent obstacles, such as a serious mental illness, a substance use disorder, or a chronic medical problem such as HIV/AIDS, will maintain their housing. Others simply need suitable housing that they can afford, or would be able to move on from supportive housing if suitable alternatives were available. Persons with criminal justice history need fair access, consistent with public safety, to affordable and market rate housing in order to support successful reentry and reduce the risk of reincarceration. The recommendations and research included below are building upon decades of work by providers, researchers, and advocates dedicated to housing and support for persons who reenter the community after incarceration. The first section will introduce the problem and detail recommendations to remove barriers and improve access to supportive, affordable, public, and market rate housing resources. The second section outlines the scope of the challenges in NYC and provides a research base for the recommendation for supportive housing resources.

The Problem

An estimated 25 thousand people are released from New York State prisons each year, and of these, nearly half return to New York City.¹ In addition, nearly 81 thousand people were released from New York City Dept. of Corrections jails in 2013.² Of all the issues facing returning prisoners, the need to secure housing is one of the most essential. Many of those released each year are homeless and have traditionally cycled out of prison and into the New York City shelter system,³ or unlicensed, unregulated three-quarter houses. In fact, analyses of the NYC Department of Homeless Services (DHS) adult homeless shelter populations in the city indicate that between 20 and 23 percent of homeless individuals have been incarcerated at some point in the two years prior to entering the shelter system⁴ and about 19 percent of persons released from NY State prisons last year listed shelters as their first known address.⁵

Because affordable housing is a scarce resource, people with criminal records are often the first to be excluded, even though housing them is a cost-effective way to accomplish the same public safety goals driving their exclusion. In fact, a 2011 peer-reviewed study of New York City's supportive housing system showed significant savings as people who received housing were less likely to be incarcerated.⁶ Similarly, decades of social science research has shown that aging and the passage of time best mitigates recidivism, so that people with criminal records eventually have no more risk of re-offending than someone without a record.^{7,8} Absent the passage of time, other factors, like an individual's evidence of good conduct, can show that the person will pose no greater risk to neighbors than someone without criminal justice history.

¹ NYS DOCCS. 2010. 2007 Releases: Three Year Post Release Follow-up. Albany: New York State Department of Corrections and Community Supervision.

² New York City Department of Correction. During calendar year 2013, 80,807 people were released from NYC DOC jails.

³ Metraux, Stephen, Caterina Roman, & Richard S. Cho. 2007. "Incarceration and Homelessness." Washington, DC: US Dept. of Health and Human Services.

⁴ Burt et al. 1999; Eberle et al. 2001; Kushel et al. 2005; Schlay & Rossi 1992.

⁵ Navarro, Mireya. November 14, 2013. *Ban on Former Inmates in Public Housing Is Eased*. The New York Times.

⁶ NYC Department of Health & Mental Hygiene et al., New York/New York III: Interim Utilization & Cost Analysis 1–3 (2011).

⁷ Robert Sampson & John Laub, *Life-Course Desisters? Trajectories of Crime Among Delinquent Boys Followed to Age 70*, 41 *CRIMINOLOGY* 3, 555–592 (2003); Shawn Bushway, et al., *The Predictive Value of Criminal Background Checks: Do Age and Criminal History Affect Time to Redemption?*, 49 *Criminology* 1, 29 (2011).

Recommendations

Supportive Housing

The Problem: There are not enough supportive housing resources available to persons with criminal justice backgrounds.

The Solution:

- 1) The next City and State supportive housing agreement should dedicate 15% of new supportive housing resources to individuals and families with criminal justice histories.
 - The obstacles created for people in need of housing who have criminal justice histories are similar to those of all special needs populations. Therefore, each category of special needs housing in the agreement should target 15% of the units to people with criminal justice histories.⁹
 - Reentry supportive housing should be specifically designed to serve criminal justice-involved persons, including specialized services that assist tenants to successfully make the transition from institution to the community, facilitate connection to and continuity of benefits, and promote the avoidance of behaviors that lead to criminal justice involvement and emergency public service use.
 - Enhanced operating and service funding should be allocated to reentry supportive housing providers to serve the special needs of this population.
- 2) Target supportive housing resources to highest need individuals and families.
 - Supportive housing resources should target the most vulnerable persons involved with the criminal justice system, including those who are high users of other public systems such as shelter and emergency/crisis health services.
 - Eligibility for supportive housing should include persons recently released from the criminal justice system who are currently homeless or living in three-quarters houses or other unstable housing conditions and have one of the following conditions: a serious mental illness, a substance abuse disorder, or a disabling medical condition.
- 3) Improve access to supportive housing for reentry population by expanding and strengthening referral networks.
 - Eligibility for supportive housing should include persons who are awaiting release (in addition to those recently released) from State or City correctional facilities.
 - To support persons with special needs as they transition out of the criminal justice system, changes need to be made at the client level to develop a referral flow and supports to help individuals move from the Correction system, to NYC Human Resources Administration, and finally to the housing provider. The referral networks should be expanded to allow individuals to apply for supportive housing placement prior to their release from prison or jail. The City-State agreement should encourage the City and State Corrections agencies to provide referrals to supportive housing.

⁸ Blumstein, A. and Nakamura, K. (2009). Redemption in the Presence of Widespread Criminal Background Checks. *Criminology*, 47: 327–359. DOI: 10.1111/j.1745-9125.2009.00155.x <http://onlinelibrary.wiley.com/doi/10.1111/j.1745-9125.2009.00155.x/abstract> and/or Alfred Blumstein, Kiminori Nakamura, Extension of Current Estimates of Redemption Times: Robustness Testing, Out-of-State Arrests, and Racial Differences, Final Report Submitted to the National Institute of Justice, October 2012

⁹ This percentage is based on the estimated portion of the current shelter population with a criminal justice history. Sources indicate that 20–23% of individuals in the DHS shelter system have been incarcerated at some point in the two years prior to entering the shelter system (Burt et al. 1999; Eberle et al. 2001; Kushel et al. 2005; Schlay & Rossi 1992.) Levels of criminal justice involvement among homeless families are lower including one study which found 6.6% of homeless mothers had a criminal justice history (Bassuk, Buckner, Weinreb et al. Homelessness in female-headed families: childhood and adult risk and protective factors. *Am J Public Health*. 1997 February; 87(2): 241–248.)

The Problem: Current definition of “chronically homeless” doesn’t include persons cycling between incarceration and homelessness.

People who have been recently released from State or City correctional facilities and are homeless should be eligible for the housing and support services they need to reenter their communities. Currently, in order to access many of the supportive housing units, individuals must meet the City’s definition of “chronically homeless”, which is more restrictive than the Federal definition, requiring the individual to spend nine months on the streets or in shelter during a two year period. This doesn’t include time spent in City or State facilities, and thus, doesn’t capture high need individuals who have been cycling between homelessness and incarceration for years. This definition also doesn’t include persons who have been incarcerated for longer periods of time or other “institutional” homeless, including time spent in hospitals, treatment or recovery programs, jails and halfway houses.

The Solution:

- Employ a definition of chronic homelessness that includes individuals cycling between incarceration and homelessness. The City should explore adopting a definition that includes episodic homelessness in order to include persons cycling between shelters and the criminal justice system, such as the U.S. Department of Housing and Urban Development (HUD) definition which includes individuals who have four documented episodes of homelessness in the past three years.
- The City should allow recently released persons who have served longer sentences, who otherwise meet eligibility criteria and are at risk of homelessness, to access supportive housing. These individuals are especially vulnerable due to lack of family and community supports during reentry. These units may be funded through City or State resources as these funds are not subject to HUD restrictions.

The Problem: Limited housing resources for reentry population leads to inappropriate placements and lack of strategies for people moving on from supportive housing.

The Solution: Improve access to and expand other parts of the housing continuum for the reentry population.

- Individuals exiting the criminal justice system have a range of needs and issues. While many are able to thrive over time in fully independent living or in independent supportive housing, where they hold a lease but can access on-site services, some have more impaired functioning that requires additional supervision and support, such as persons with mental health and psychiatric issues. These individuals require alternative service-enriched models of supportive housing with more intensive on-site supports such as licensed community residences and apartment treatment programs.
- Housing providers must have open communication with community corrections. Community corrections should offer additional supervision during the reentry period through Critical Time Intervention.
- Outreach programs should be expanded to ensure that vulnerable individuals with special needs who have landed post-release in unsafe or unstable housing, such as three-quarters houses, can be connected with the supportive services and housing they need.
- Finally, ensuring access to affordable and, where possible, market-rate housing options is critical to assist this population in finding housing initially and in moving on from supportive housing when appropriate. Short and long term rental subsidy programs including rapid rehousing can help make ends meet for families and individuals moving to market rate housing while homelessness prevention programs like Homebase can support them during a short term crisis to keep them housed stably.

Affordable Housing

The Problem: Low-income and vulnerable New Yorkers are forced into unsafe and illegal housing as there aren't enough affordable housing resources available.

Affordable housing options for low-income New Yorkers have dwindled over the past three decades. Single room occupancy (SRO) buildings provided homes for single adults who were unable to afford full apartments. There was a dramatic reduction of SRO units between the 1950's and 1980's in the City. In 2005, low income residents lost another critical housing resource when the Bloomberg administration cutoff City Section 8 vouchers. Currently, much of this population relies on the NYC Human Resources Administration Public Assistance Shelter Allowance, which for a single adult is \$215/month (an amount that hasn't increased in 26 years), making it almost impossible for recipients to find safe, legal housing.

In the absence of affordable housing for very low-income single adults, an underground cottage industry of unlicensed housing has mushroomed in New York, called "three-quarter houses". These buildings tend to be overcrowded, with multiple housing code violations¹⁰. Frequently, tenants who fail to attend a treatment program—even if they don't need treatment or have already completed one—are evicted with no notice and no court process. Such housing creates instability in the lives of individuals attempting to rebuild their lives post-incarceration.

The Solution: Expand housing options for formerly incarcerated persons and other very low-income individuals and provide pathways to improved conditions.

- Repeal the prohibition on shared household arrangements that include more than three unrelated adults. The prohibition now drives three-quarter houses underground and obstructs opportunities to provide safe, cost-effective and lawful housing alternatives for low-income single adults.
- NYC Department of Buildings should develop legal shared housing options for unrelated adults. Lift the ban on the construction of new Single Room Occupancy (SRO) housing, which provides fundamental housing of last resort for very low-income adults.
- The City should pilot a program that provides higher shelter allowance payments to three-quarter houses that meet basic building and program standards as enforced by the City. Funds to allow housing providers to offer enriched services, similar to the NYS Office of Mental Health pilot initiative¹¹ in Suffolk County.
- The City should consider creating a new and improved local rental assistance program modeled on the proven Section 8 voucher program, which would employ eligibility requirements that are more inclusive to the reentry population than the HUD guidelines.

The Problem: Widespread housing discrimination prevents persons with criminal justice backgrounds from accessing affordable housing.

It is widespread practice, to engage in blanket discrimination based on applicants' history of contact with the criminal justice system, including when screening applicants for affordable housing supported in whole or part by public funding. Too often applicants are rejected without fair consideration solely because of their records. There are strong public policy reasons for housing supported by public dollars to contribute to a range of outcomes that make communities safer and healthier, including reduced recidivism, reduced spending on incarceration and support for successful reentry and family reunification.

¹⁰ Prisoner Reentry Institute, John Jay College of Criminal Justice, *Three Quarter Houses: The View from the Inside* (hereinafter "PRI Report") 5-6 (October 2013), available at <http://johnjayresearch.org/pri/files/2013/10/PRI-TQH-Report.pdf>. For background on policies that fed the growth of three quarter houses, see Coalition for the Homeless, *Warehousing the Homeless: The Rising Use of Illegal Boarding Houses to Shelter Homeless New Yorkers* (hereinafter "Warehousing the Homeless") 5-7 (January 2008), available at http://coalhome.3cdn.net/ddc8dd543ded03ff12_lpm6bh1cr.pdf.

¹¹ NY State Office of Mental Health, Enriched Crisis and Transitional Housing Services Pilot Initiative, www.omh.ny.gov/omhweb/rfp/2014/enriched-crisis/

The Solution:

- “Ban the box” protections should be applied to the screening and qualification process for affordable housing, requiring that record of conviction be considered only at the stage that an individual has been determined eligible for an apartment.
- The City should provide background checks to housing providers and developers to ensure that any information that cannot be considered, such as sealed records or information older than cutoff points is not used to discriminate against an applicant.
- Disqualification because of a record should meet criteria directly related to public safety. This decision should be based only upon actual conviction of a crime that justifies a finding of current risk, with length of time and evidence of rehabilitation since conviction considered. However, if a person has been at liberty for 3 years without a criminal conviction, evidence of conviction prior to that period may not be considered in determining eligibility for affordable housing.
- As affordable housing is a scarce and precious resource supported by limited public dollars, the tenant selection process for such apartments is rightly strictly regulated and closely monitored. A requirement outlining this process should be included in the regulatory agreement made between the housing provider and the City or State agency. Protections against blanket discrimination based on a criminal record should be included among the areas the city monitors, with stringent review of rejections based on criminal record.

Public Housing

The Problem: Persons with criminal justice backgrounds are unable to access public housing.

In a city with an affordability crisis, New York City Housing Authority (NYCHA) housing is one of the few options for permanent, stable housing for low-income New Yorkers. NYCHA has recently taken tremendous steps towards promoting reentry by revising the permanent exclusion policy so that a single violation conviction no longer creates an automatic bar, starting the ineligibility “clock” at time of release from jail or prison, looking at whether the exclusion period has been met at the time that a person reaches the end of the waiting list rather than at the time of application, and creating the Family Reunification Pilot. Housing Authorities nationwide have been looking to NYCHA, alongside other communities, to lead the way in improving access for the reentry population.¹² But NYCHA still bars thousands of New Yorkers based on convictions. Mandatory ineligibility timeframes and permanent exclusions undermine successful reentry by making it difficult for children, grandchildren, and spouses to join or re-join their own families.

The Solution

1. NYCHA should not use “blanket” bans on applicants with any conviction record, except the two narrow mandatory exclusions required by federal law.¹³
2. No conviction should be used as a basis for termination or exclusion from tenancy unless NYCHA demonstrates that it considered: (1) the nature of the conduct and how it bears on the safety and security of other residents; (2) the gravity of the conduct; (3) the time that has passed since the conviction and/or completion of the period of incarceration; and (4) evidence of the applicant / resident’s rehabilitation.
 - a. All applicants must be given an opportunity to review and explain any conviction record, and NYCHA must consider the explanation / challenge to accuracy.
3. Even if NYCHA determines that a conviction bears a substantial relationship to tenancy, NYCHA should not deny the application based on the conviction if three years have passed since the applicant was placed on probation, paroled or released.

¹² Peters, Mark. U.S. News: Out of Jail but Still Barred --- Cities Rethink Tough-on-Crime Strategies Banning Ex-Cons From Public Housing. May 13, 2014. The Wall Street Journal.

¹³ Persons Subject to Lifetime Sex Offender Registration (42 U.S.C. § 13663(a)) and Persons Convicted of Methamphetamine Production (42 USC § 1437n(f)) will be found ineligible.

4. The maximum length of exclusion from a household based on conviction or non-desirability should be three years, with opportunity to apply to lift the exclusion sooner, based on evidence of rehabilitation.
5. NYCHA should never consider arrests or other unproven allegations, or any sealed records when assessing an application or as a factor when making a determination regarding a permanent exclusion or termination proceeding.
6. NYCHA should never begin termination proceeding before a case has been resolved and should not use arrest information that is then sealed or made confidential to terminate a tenant.
7. NYCHA should not exclude children under the age of 21 unless it can demonstrate that the youth poses an immediate threat to other tenants (or the general public). Research has found that keeping youth connected to their family can promote better outcomes for youth, families, and communities. Permanent Exclusion stipulations targeting youth for whom parents/guardian still have an obligation under law to support (i.e. youth under the age of 21) tears families apart, leaving them little option for maintaining regular contact.
 - a. If unable to change this policy, NYCHA should enact a Temporary Exclusion (up to three years) for youth under the age of 21 which also allows for occasional visits to their family's home. A temporary exclusion will allow youth to maintain a relationship with their family and allow for a second chance to reunite with their family in NYCHA housing.
8. For any denial based on a conviction record, NYCHA should create a written statement of its analysis of the person's record and all factors set forth in Proposal (2) above.

Private / Market Rate Housing

The Problem: Private landlords can discriminate against persons with criminal justice backgrounds.

The NYC Human Rights Law (§ 8-107 (11)) prohibits any inquiry about or adverse action based on *arrests not followed by a conviction* in connection with employment or licensing, but not for housing. By the same token, the Human Rights Law (§ 8-107 (10)) prohibits blanket discrimination in employment and licensing based on conviction history in violation of Article 23-A of the NYS Correction Law (but not housing).

The Solution: Amend HRL § 8-107 (11) to cover private landlords, and amend HRL § 8-107 (10) to create a parallel protection for housing, specifying that:

1. Private landlords may not implement "blanket" bans on housing applicants based on convictions.
2. No conviction should be used as a basis for termination or exclusion from tenancy unless the landlord demonstrates that she considered: (1) the nature of the conduct and how it bears on the safety and security of other residents; (2) the gravity of the conduct; (3) the time that has passed since the conviction and/or after release or placement on probation or parole; and (4) evidence of the applicant / resident's rehabilitation.
 - a. All applicants must be given an opportunity to review and explain any conviction record.
3. Private landlords may not inquire about convictions if three years have passed since the applicant was placed on probation, paroled or released.
4. Private landlords must never consider arrests, other unproven allegations or information about cases that have been sealed or are confidential in assessing an application.

Breaking the Cycle

Incarceration and Homelessness. Individuals suffering from homelessness seek refuge in public areas such as parks, subway facilities, and playgrounds. Several studies have documented the high rates of untreated mental illness and substance abuse problems among members within this population.¹⁴ The failure to treat these underlying problems compounded with limited housing resources increase the likelihood for homeless individuals to be subjected to low-level enforcement, in turn, leading to contact with the criminal justice system. Individuals who are homeless and have a behavioral health disorder are overrepresented in the criminal justice system.¹⁵ Moreover, homeless individuals are found to be arrested and re-arrested at higher rates than individuals who have stable housing.¹⁶ Twenty percent of the homeless population will be incarcerated at some point within their life and one-tenth of the current jail and prison population were homeless prior to admission.¹⁷

The Problem in NYC. One study found that 38% of New York State prisoners who entered NYC shelters were incarcerated within two years of their release.¹⁸ The rates of shelter entry and prison readmission were even higher for persons incarcerated for a parole violation and for those with mental illness. A study of administrative data on public shelter use in New York City found that approximately 10% of shelter users in New York City were ‘episodic’ users of shelter, and were more likely “to have mental health, substance abuse, and medical problems” and that “much of the periods they spend outside of shelter may be spent in hospitals, jails, detoxification centers, or on the street. Indeed, one could argue that part of the very reason that these individuals are not defined as chronically homeless or long-term shelter residents is their frequent exit to inpatient treatment programs, detoxification services, or to penal institutions. Nevertheless, these clients often find their way back to shelters.”¹⁹

Impact on Families with Children. Roughly 105,000 children in New York State have parents who are incarcerated.²⁰ Parental incarceration and the resulting instability of the family unit can severely impact children’s health and educational outcomes. The Center for Disease Control has recognized parental incarceration as an “adverse childhood experience” in which children experience a unique combination of trauma, shame and stigma. For these children, “the collateral damage of the justice system”, the effects of separation due to parental incarceration result in a host of added difficulties which include “failure to thrive, depression, delinquency and academic problems”. In addition, the lives of these children are characterized by frequent changes in caregivers, residences and schools, long periods of separation, and feelings of anxiety.

Supportive Housing

Supportive housing is a key part of the continuum of resources for criminal justice-involved persons to break their high-cost cycle of incarceration, homelessness, and emergency service utilization. Supportive housing provides stable homes to formerly incarcerated homeless persons with special needs and chronic health challenges to help them achieve stability, live with dignity and maximize their independence. Through a combination of affordable housing and integrated supportive services, supportive housing ensures that people with long histories of homelessness that face persistent obstacles, such as a serious mental illness, a substance use disorder, or a chronic medical problem such as HIV/AIDS, will maintain their housing.

¹⁴ Speiglmán, R. and Rex Green. Homeless and Non-Homeless Arrest: Distinctions in Prevalence and in Sociodemographic Drug Use and Arrest Characteristics Across DUF Sites, Final Report. National Institute of Justice. 2002: 1-48.

¹⁵ National Health Care for the Homeless Council. Criminal Justice, Homeless, & Health. 2011: 1-4.

¹⁶ Mettraux, S., Roman, C. and Cho, R. Incarceration and Homelessness. 2007 National Symposium on Homeless Research. 2007: 1-31.

¹⁷ Mettraux, S., Roman, C., and Cho, R. 2007: 1-13

¹⁸ Mettraux, S., Culhane, D. “Homeless Shelter Use and Reincarceration Following Prison Release”, *Criminology & Public Policy*, 3 (2), 139-160.

¹⁹ Kuhn, R., Culhane, D. 1998, “Applying Cluster Analysis to Test a Typology of Homelessness by Pattern of Shelter Utilization: Results from the Analysis of Administrative Data”. *American Journal of Community Psychology*. 1998: 26-2

²⁰ Krupat, T., Gaynes, E., and Lincroft, Y. (2011) *A Call to Action: Safeguarding New York’s Children of Incarcerated Parents*. New York, NY: New York Initiative for Children of Incarcerated Parents, The Osborne Association.

Reentry Supportive Housing. Reentry Supportive Housing is supportive housing that is specifically designed to serve criminal justice-involved persons who are homeless or at immediate risk of homelessness, many of whom have chronic physical and/or behavioral health challenges, in order to break their high-cost cycle of incarceration, homelessness, and emergency service utilization.²¹ Supportive housing that enables families to successfully reunite has lasting benefits for children, and decreases the likelihood of their parent's recidivism. As with typical supportive housing, supportive services in Reentry Supportive Housing are provided using a client-centered case management model, where individually tailored service plans are created and implemented in conjunction with each tenant, and where services are intended to maximize housing stability and address a variety of health and psychosocial needs. In addition to these services, Reentry Supportive Housing also includes specialized services that assist tenants to successfully make the transition from institutions to the community, facilitate connection to and continuity of benefits, and promote the avoidance of behaviors that lead to criminal justice involvement and emergency public service use.²²

Evidence Based Practices. A recent evaluation of the Frequent Users Services Enhancement (FUSE) initiative in New York City conducted by Columbia University²³ suggests that supportive housing effectively improves outcomes for the reentry population and decreases public systems use. The FUSE initiative is a supportive housing program developed by CSH with support from private foundations and various government agencies that provided housing and support services to individuals who were frequently cycling in and out of jails and homeless shelters. FUSE participants were identified by conducting a data match between jail and public shelters to identify individuals who had at least four shelter stays and four jail stays over the last five years prior to the program. The two-year evaluation found that FUSE participants spent significantly fewer days in jail and shelters and engaged in less cycling between public systems, including:

- FUSE participants averaged 15 days in shelters in the 24 months after FUSE housing placement compared to a comparison group who averaged 162 days in shelters over the same time period.
- FUSE participants had a lower percentage of recent hard drug use than the comparison group.
- Through reduced usage of jails, health services and shelters, each individual housed through FUSE generated \$15,000 in public savings, paying for over two thirds of the intervention cost.

This study's use of a comparison group while capturing data about service utilization over two years allowed Columbia to determine personal outcomes that improved as a result of supportive housing. Overall, the study suggests that the FUSE intervention had multiple positive outcomes that resulted in decreased costs for New York City and tax payers as well as improved lives for program participants.

Housing Resources for Reentry in NYC. The past three NY/NY supportive housing agreements have assumed that criminal justice populations would naturally be included as they would otherwise meet the eligibility criteria, and thus did not dedicate any new units specifically to this population. Due to challenges unique to persons cycling between the shelter system and the criminal justice system, such as referral sources and eligibility criteria, this population too often is not meeting the criteria for the supportive housing resources they need. In the absence of supportive housing and other affordable housing models, significant numbers of individuals released from incarceration presently rely on a network of over 300 three-quarter houses.²⁴

²¹ Hopper, et.al. (1997) "Homelessness, severe mental illness, and the institutional circuit" *Psychiatric Services*. 48 (5):659-65.; Lurigio et. al., 2000; Ventura et. al, 1998; Hartwell and Orr, 1999; Lamberti et. al, 2004.

²² Metraux, Roman, and Cho (2007). "Incarceration and Homelessness," in *Towards Understanding Homelessness: The 2007 National Symposium on Homelessness Research*, eds. Deborah Dennis, Gretchen Locke, and Jill Khadduri. Washington DC: US Department of Housing and Urban Development. <http://www.huduser.org/publications/homeless/p9.html>

²³ Aidala, Angela; McAllister, William; Yomogida, Maiko; Shubert, Virginia. 2013. "Reducing Homelessness, Incarceration and Costs through Supportive Housing – The New York City FUSE Evaluation". Columbia University Mailman School of Public Health.

²⁴ Prisoner Reentry Institute, John Jay College of Criminal Justice, Three Quarter Houses: The View from the Inside (hereinafter "PRI Report") 5-6 (October 2013), available at <http://johnjayresearch.org/pri/files/2013/10/PRI-TQH-Report.pdf>

Unlicensed, unregulated, overcrowded and often with multiple housing code violations,²⁵ three-quarter houses are operated for-profit and many engage in practices that interfere with successful reentry, creating instability and disruption in the lives of individuals trying to rebuild their lives.²⁶

Summary

This document was jointly prepared by experienced, thoughtful re-entry housing and service providers, gathered together by CSH, to use their knowledge to make well-thought recommendations to increase access to housing for those reentering the community from jail or prison. Participants included: Brooklyn Community Housing and Services, The Bronx Defenders, The Bridge NY, CASES, Community Access, Exodus Transitional Housing Community, Fortune Society, Green Hope, Hour Children, Housing Plus Solutions, John Jay College, Legal Action Center, Neighbors Together, The Osborne Association, Prisoner Reentry Institute at John Jay College, Providence House, and the Women's Prison Association. It builds upon years of previous work by a broad array of coalitions and task forces and, in effect, stands upon the shoulders of work done by a broad community of advocates and service providers.

We believe that, by implementing these recommendations, thousands of New Yorkers will avoid recidivism, reconnect with families, find stable housing and begin to lead productive lives in our communities. We will continue to provide our support and expertise to government to make the recommendations a reality.

Submitted on behalf of:

The Bridge, Inc.
The Bronx Defenders
Brooklyn Community Housing and Services (BCHS)
CASES
CSH
The Fortune Society, Inc.
From Punishment to Public Health (P2PH)
Greenhope Services for Women
Hour Children, Inc.
Legal Action Center
Neighbors Together
The Osborne Association
Prisoner Reentry Institute, John Jay College of Criminal Justice
Providence House Inc.
Supportive Housing Network of New York

Please contact Kristin Miller at kristin.miller@csh.org with questions.

²⁵ PRI Report at 6-7, citing an analysis by the Furman Center for Real Estate and Urban Policy, finding that of 317 known three quarter house addresses, 88% had a building code complaint between 2005 and 2012 that resulted in at least one violation or stop-work order by the New York City Department of Buildings.

²⁶ PRI Report at 23-26; Ewing article (describing a resident's choice between unnecessary house-mandated treatment and paid employment and classes)