Testimony of FPWA

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We are grateful to the Council Committee on General Welfare for holding this hearing and to Chair Crystal Hudson and members of the committee for the opportunity to provide testimony on behalf of FPWA (Federation of Protestant Welfare Agencies).

FPWA is a leading anti-poverty, social policy, and advocacy organization dedicated to strengthening human services organizations and faith institutions and advancing economic security and justice for all New Yorkers. Since 1922, FPWA has driven groundbreaking policy reforms to better serve those in need. We work to dismantle the structural and systemic barriers that impede economic security and well-being, and we strengthen the capacity of human services agencies and faith organizations so New Yorkers with lower incomes can thrive and live with dignity.

We are providing this testimony in support of the proposed legislation (Int. No. 139), sponsored by Council Members Cabán, Hudson, Hanif, and Louis, which would require the Department of Social Services to provide a benefits interview confirmation notice. We also wish to highlight other issues related to the eligibility and recertification interview processes that we have learned about in our research and from hearing directly from New Yorkers who receive cash assistance.

In 2024, FPWA co-founded the National True Cost of Living Coalition. In partnership with Community Service Society of New York, FPWA commissioned the Urban Institute to develop a first-in-the-nation True Cost of Economic Security (TCES) measure, which provides a comprehensive view of households' costs and resources detailed at the county level.[1] This research revealed that across the nation, 52 percent of people—and 62 percent of the residents of New York City[2]—are economically insecure, meaning they do not have the resources necessary to meet this comprehensive set of regular household costs, set aside savings both for future planning and for short-term emergencies, and manage debt. In certain areas and for certain demographic groups, that number is even higher. For instance, 72 percent of families with children in New York City—and an unconscionable 91 percent of single-parent households across the City—fall below the TCES, with New Yorkers of color disproportionately experiencing economic

[1] Acs, G., Dehry, I., Giannarelli, L., & Todd, M. (2024*). Measuring the True Cost of Economic Security: What does it take to thrive, not just survive, in the US today?* Urban Institute. https://www.urban.org/sites/default/files/2024-11/Measuring-the-True-Cost-of-Economic-Security.pdf
Using county-level data, the TCES offers a robust look at the costs families face today, measuring average costs for food, clothing, housing, health care, childcare, transportation, post-secondary education, debt service, and additional miscellaneous costs. In addition, the measure calculates the resources that individuals and families have to meet these costs, including labor earnings and self-employment income, some types of passive investment income, pensions and retirement income, government social insurance and public assistance programs like Social Security, Medicare, Medicaid, and the Supplemental Nutrition Assistance Program (SNAP), as well as employer-provided healthcare contributions. Unique to this measure, the TCES includes a 10 percent savings threshold in the costs criteria that allows households to cover unexpected expenses and plan for the future.
[2] FPWA. (2025). *True Cost of Economic Security: Policy implications for New York City*. https://www.fpwa.org/wp-content/uploads/2025/09/True-Cost-of-Economic-Security_Policy-Implications-for-New-York-City_9.29.25-1.pdf

insecurity.[3] More, economic mobility has declined[4] and wages have stagnated,[5] leaving economic security out of reach for most New Yorkers.

New Yorkers who are experiencing deep economic insecurity, those furthest from the TCES, are unable to meet their daily needs without critical government supports, such as cash assistance (also referred to as public assistance, temporary assistance, or welfare) and the Supplemental Nutrition Assistance Program (SNAP). And it is these programs that are now under direct attack from the current federal administration, further exacerbating the cost-of-living crisis in our city. The deep cuts to these programs are ripping away vital support from those already facing the most extreme economic insecurity, and the city must step up to help all eligible New Yorkers access these critical income supports.

Over the past several years, we have conducted research to better understand the challenges New Yorkers face in accessing benefits and identify ways to address administrative barriers. FPWA's 2024 report, *Rewriting the Story*, shares findings from a series of in-depth interviews that we conducted with New Yorkers who receive cash assistance that sheds light on some of these barriers.[6] The New Yorkers we interviewed spoke about how they struggle to get by on cash assistance and often go without basic needs, which is why we continue to advocate on the state level for a significant increase in the grant. But participants also spoke about how the program, while vital, is notoriously difficult to access, and they provided extensive accounts of a myriad of access and retention barriers they have experienced. Among the barriers they spoke about were the benefits eligibility and recertification interview processes, which remain a main reason why New Yorkers lose or are denied access to cash assistance. From our research and hearing directly from New Yorkers who receive cash assistance, we know the importance of mitigating issues related to interview process. For this reason, we strongly support the proposed legislation (Int. No. 139), which would require the Department of Social Services to provide a benefits interview confirmation notice, a proposal that we recommended in our 2024 report.

New Yorkers Face Persistent Barriers to Access Public Benefits

Each year, tens of thousands of New Yorkers are denied access to benefits due to administrative barriers related to the application and recertification processes. In the cash assistance program, for example, these procedurally driven denials and case closures are consistently the main reason individuals are denied or lose cash assistance, demonstrating that these processes are overly burdensome for those seeking assistance. From July 2024 to June 2025, New York State denied 340,109 applications (67.8 percent of all denials) due to reasons related to the application process (i.e., "failure to comply with application

[3] FPWA. (2025). *True Cost of Economic Security: Policy implications for New York City*. https://www.fpwa.org/wp-content/uploads/2025/09/True-Cost-of-Economic-Security_Policy-Implications-for-New-York-City_9.29.25-1.pdf
[4] Isaacs, J. B. (2016). *International comparisons of economic mobility*. The Brookings Institution. https://www.brookings.edu/wp-content/uploads/2016/07/02_economic_mobility_sawhill_ch3.pdf
[5] DeSilver, D. (2018). *For most U.S. workers, real wages have barely budged in decades*. Pew Research Center. https://www.pewresearch.org/short-reads/2018/08/07/for-most-us-workers-real-wages-have-barely-budged-for-decades/
[6] FPWA. (2024). *Rewriting the Story: Lived experiences of New Yorkers receiving cash assistance*. https://www.fpwa.org/wp-content/uploads/2024/10/FPWA-Cash-Assistance-Story-Collection-Series_10.21.2024_3.52_PM-1.pdf

requirements, such as failure to appear for interviews or failure to provide documentation") and closed more than 142,911 cases due to reasons associated with the recertification process (i.e., "failure to comply with program requirements not related to employment such as failure to recertify"), representing 49.7 percent of all cases closed.[7] These barriers are a significant issue in New York City, especially as it relates to the benefits interview process. City data from Fiscal Year 2024 shows that more than 108,000 cases were denied because the applicant was unable to complete the eligibility interview, representing the largest category of all cases denied. This data shows that many New Yorkers also faced challenges with the interview during the recertification process, as more than 23,000 cases were closed for not completing the recertification interview.[8] (This represents a significant increase from FY23, during which more than 84,000 cases were denied because the applicant was unable to complete the eligibility interview and another nearly 9,000 cases were closed for not completing the recertification interview.)

Many of the New Yorkers we spoke with reported that the interview process was a significant barrier for them. For example, one participant, who is a mom to a 5-year-old daughter, started receiving cash assistance because she became homeless while she was pregnant and needed help affording basic needs. Her case was closed due to administrative errors related to her recertification and the interview:

"They messed up my case last year in December. They claimed I didn't do my recertification, but I did it in October…and the person that did the interview call with me…forgot to put it in the system. So, I had to do it again…and then they still closed my case."

As a result of the state's error, she and her daughter went without benefits for about a month and a half, during which time they struggled to afford food and other essentials. Another participant reported that when she applied for cash assistance, she ended up having to do a second eligibility interview. She said the whole process was "like a test" where she felt like she was purposefully being given "the runaround." Another participant we interviewed reported extensive challenges with the recertification process, and at the time we spoke with him, he had not received his benefits from the previous month, despite having done *three* interviews. If Int-0139 were enacted, these individuals would have received confirmation within 24 hours of their interviews, and failing to receive such notice would have alerted them to follow up with their case manager to obtain confirmation. They also would have had the opportunity to rectify any issues earlier in the process, which may have prevented them from losing benefits or having to repeat steps in the process.

In addition to supporting the proposed legislation, we also want to call attention to other issues related to the eligibility and recertification interviews that we have learned about in our work. As mentioned in the accounts from cash assistance recipients above, New Yorkers frequently report that they participate in their eligibility or recertification interview, but that the case worker who conducted their interview did

[7]New York State Office of Temporary and Disability Assistance. (2025). *2025 Legislative Report on Public Assistance.* https://otda.ny.gov/resources/legislative-report/2025-Legislative-Report.pdf

[8] New York City Human Resources Administration. *Local Laws 168 and 170 Reports*. https://www.nyc.gov/site/hra/news/local-laws-168-170-reports.page

not document it. Without documentation proving that they completed the interview, applicants/recipients are left without recourse. In addition to this, individuals we interviewed reported general confusion about the interview process overall, such as not knowing how to complete the interview. In 2022, the Human Resources Administration (HRA) implemented an on-demand telephone interview feature where applicants call and wait on the line for a staff member. However, individuals we interviewed who used this feature reported that they were put on hold for lengthy amounts of time, some reporting three to five hours. Thus, we encourage the Council to consider how to address these issues more broadly to ensure that the interview process does not continue to impose such a significant barrier for New Yorkers in need.

The interview is just one part of the long, burdensome application and recertification processes. Interview participants shared extensive accounts about this, but in general, they demonstrate that the cash assistance program is administered in a way that reflects the program's history: it is punitive, confusing, and designed to deter people from seeking assistance.

Participants we interviewed consistently reported that during the application process, they were often told that they did not submit paperwork or that it was "lost," even though they had a record of submitting it. Participants also reported challenges with the recertification process, such as not knowing when to recertify and not receiving notice, and many have been cut off from cash assistance as a result. Several participants reported that they lost benefits because of some processing error, such as a caseworker not entering their recertification into the system. Participants reported going without food or other essentials or turning to local food pantries or nonprofit organizations when their benefits were cut off. As one participant stated plainly: "They make it so hard [to access cash assistance]. It makes it easier for you to walk away."

The other access and retention barriers that came up repeatedly in our interviews are:

- ***Long Wait Times:*** Participants reported that they frequently wait hours, sometimes the entire day, while applying or recertifying in person or visiting an office to resolve an issue. One participant said she has had to take time off from work several times to resolve various issues, and she added that maintaining cash assistance "is like an actual job." This was also reflected in a survey we conducted, where 68 percent of respondents reported waiting three or more hours during their most recent visit to their social services office, with 42 percent waiting five or more hours. Participants also reported long hold times on the phone. One participant, who was a victim of benefits skimming and had her benefits stolen, said she counted that she spent 30 hours on the phone trying to resolve the issue.
- ***Poor Communication and Inconsistent Information About Program Requirements:*** Many participants reported instances where they could not reach anyone at HRA or their local social services office to resolve an issue. Participants also reported receiving incorrect or conflicting information from staff about program rules and application/recertification requirements.
- ***Disrespect and Negative Experiences with Staff:*** Participants reported being treated poorly by staff while applying, recertifying, or resolving issues with their cases, and they described the

experience of going to a Benefits Access Center as "uncomfortable," "intimidating," even "humiliating."

Finally, it is also important to consider the lived reality of New Yorkers who are trying to access benefits and the reasons why individuals turn to these programs in the first place. In an analysis by the Urban Institute, participants, many of whom were from New York, reported that they turned to cash assistance after some life-altering event or circumstance, like a job loss, the birth of a child, or the ending of a relationship.[9] Participants consistently shared similar stories in our interviews. For example, one participant came to cash assistance for the first time after her relationship with her child's father ended. Suddenly a single parent, she was unable to afford child care. Another participant came to the program after the birth of her child, who has a disability and required intensive care. A few others lost their jobs or experienced a loss such as a death in their family. Homelessness and health issues (i.e., injury, illness, and physical and mental health issues) were among the most common reasons why people turned to the program. Another participant, who is a new mom, applied after her partner was severely injured in an accident and was unable to work. Another participant had been working as a firefighter until he was diagnosed with cancer and needed to undergo several surgeries, after which he needed additional financial support.

Given that individuals and families are turning to benefits programs during particularly stressful moments in their lives, it is critical that the application and recertification processes are designed to be as simple and transparent as possible. These administrative hurdles can exacerbate existing stress or trauma that applicants and recipients are already experiencing and lead to eligible New Yorkers losing out on necessary benefits. Thus, making these processes more efficient is not only advantageous from an administrative perspective, but it will also ensure a level of dignity and empathy for those seeking assistance.

The Proposed Legislation Would Improve Access to and Retention of Public Benefits

The proposed legislation (Int. No. 139) would require the Department of Social Services (DSS) to provide a benefits interview confirmation notice no later than 24 hours after conducting an eligibility or recertification interview with an applicant for cash assistance, emergency assistance (as such term is defined in subdivision a of section 21-150), or SNAP benefits. DSS would be required to provide applicants, either in hard copy or electronically, with a confirmation notice that would include, at a minimum, a confirmation number, the date and time of the interview, the location of the interview, the phone number from which the applicant received a phone call, if the interview was conducted via telephone, and any other relevant information regarding the interview. While this change may seem simple, we recommended it in our 2024 report because applicants and recipients of cash assistance, as well as many advocates we spoke with, recounted numerous instances in which staff neglected to log the completion of eligibility or rectification interviews, and the applicant never received a formal confirmation, resulting

[9] Anderson, T., Coffey. A., Daly, H., Hahn, H., Maag, E., & Werner, K. (2022). *Balancing at the Edge of the Cliff: Experiences and Calculations of Benefit Cliffs, Plateaus, and Trade-Offs.* Urban Institute.
https://www.urban.org/sites/default/files/publication/105321/balancing-at-the-edge-of-the-cliff_0.pdf

in New Yorkers being wrongly denied benefits or recipients having their cases erroneously closed at recertification. Providing a confirmation notice will make the process more transparent, and mitigating any confusion regarding the interview may help ensure that thousands of income-eligible New Yorkers are not unfairly denied benefits. This may also save DSS time processing applications and reduce related administrative costs, and it may also help reduce costs associated with program churn.

Conclusion

Thank you for your time and your attention to these critical issues. Int. No. 139 will bring us closer to a system in which all those in economic crisis can receive the benefits to which they are entitled. As the federal government is increasing barriers to these critical programs, it is more important than ever that the city step up and do everything within its power to fulfill its responsibility to care for New Yorkers facing deep economic insecurity, and improving access to public benefits is one important way the city can do this. FPWA looks forward to working with members of the City Council to advance this important legislation.