



Trapped in Danger

How NYCHA Puts the Lives of Gender-Based Violence Survivors at Risk by Delaying Emergency Transfers

An Advocacy Report

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About Legal Services NYC's Public Housing Work

Legal Services NYC has assisted thousands of public housing families and individuals over the past few years with myriad legal issues related to their tenancies, including eviction defense, unsafe living conditions, disability accommodations, VAWA emergency transfers, RAD/PACT conversions, and Public Housing Preservation Trust voting procedures, among other issues. LSNYC has also represented tenants in federal lawsuits seeking to uphold their rights under the Brooke Amendment, the Americans with Disabilities Act, the Fair Housing Act, and the Violence Against Women Act.

LSNYC staff have been featured in numerous national and local print and television media outlets discussing the challenges our organization's clients living in NYCHA face, including the New York Times, the Guardian USA, City Limits, The City, and Telemundo, among others. Our staff regularly testify before legislative bodies, submit comment letters to agencies at all levels of government, and participate in local and national coalitions to drive policy that augments the rights of public housing residents both locally and nationally.

Executive Summary

Since the Violence Against Women Reauthorization Act of 2013, survivors of intimate partner violence, dating violence, sexual assault, and stalking (collectively, survivors of gender-based violence or “GBV”)¹ have a right to request an “emergency transfer” to another apartment in order to escape an abusive environment. Public housing authorities (“PHA”), such as the New York City Housing Authority (“NYCHA”), are required to evaluate a survivor’s emergency transfer request and, if approved, effectuate the transfer as soon as a suitable unit is available. Federal regulations require PHAs to give emergency transfers as high a priority as other types of transfers in emergency situations, such as those involving physical hazards that make an apartment unlivable or life-threatening medical conditions.

As of September 2024, close to 2,000 GBV survivors sat on NYCHA’s emergency transfer waitlists.² Legal Services NYC (“LSNYC”) submitted a Freedom of Information Law request to the New York City Housing Authority to obtain the average time survivors sit in such waitlists, but NYCHA responded that they do not maintain such information. However, we know from our client work what survivors go through—NYCHA approves their transfer requests fairly quickly but then they sit on a waitlist for years until they are actually transferred. In the meanwhile, they are exposed to ongoing threats of violence or actual violence. They are either living in an abusive environment or must wait for their transfer in a

“I could have died when I was attacked and NYCHA did nothing to speed up my transfer.”

-Sarah (waited one-and-a-half years for a transfer)

homeless shelter. They are not afforded any provisional safety measures—NYCHA approves their emergency transfer, puts them on a waitlist, and does not contact them again until their number comes up, years after.

The result of the above is that thousands of GBV survivors with approved emergency transfer requests continue to live in danger, homelessness, or both, while they wait two, three, or more years for NYCHA to effectuate their transfer.

NYCHA residents are 90% Black or Latinx and GBV survivors are 80% female. Delays in emergency transfers at NYCHA is an issue that almost exclusively affects women of color, in particular Black and Latinx women.

As this report shows, the fate of GBV survivors waiting for an emergency transfer is not happenstance or made in error. **Rather, it is the direct result of a set of policy and operational decisions made by NYCHA that have deprioritized their safety and well-being.** It is *entirely* within NYCHA’s control to fix this problem.

Key Findings & Recommendations

Give Emergency Transfers a Much Higher Priority

NYCHA has decided to place emergency transfers in its lowest priority category, above which there are numerous transfer reasons involving non-emergency circumstances (such as transfers because the tenant has empty rooms in their home or because the tenant lives in a seniors' building without being elderly).

Under NYCHA's rules, 11 transfer categories—most not involving emergency circumstances—have a higher priority than VAWA emergency transfers. Plus, survivors waiting for an emergency transfer are in the same priority level as thousands of other tenants seeking non-emergency transfers.

Therefore, NYCHA must give a much higher priority to VAWA emergency transfers. This recommendation is not new—in a recent report, the Government Accountability Office (“GAO”) noted that, pursuant to federal regulations, emergency transfers under VAWA

“This transfer process has been incredibly frustrating. We shouldn't have to jump through so many hoops to live in a safe home especially when children are involved. NYCHA must prioritize our safety.”

-Jessica (waiting nearly three years for a transfer).

must have as high a priority as other types of emergency transfers such as those involving physical hazards that make an apartment unlivable or life-threatening medical conditions.

The GAO report also noted that other public housing authorities across the country give emergency transfers the highest priority, most notably the Boston Housing Authority and the Oakland Housing Authority. NYCHA can and should do the same.

Fix the Vacant Units Crisis

NYCHA's vacancy turnover rate—the average number of days it takes to complete repairs in a vacant apartment and re-rent it—rose from **98 days** in FY20 to **424 days** in FY24, a **337% increase**. Meanwhile, more than 5,000 apartments across NYCHA sat vacant in 2023, all the while nearly 19,000 applicants waited for a NYCHA transfer or a new apartment.

Over the past 6 years, NYCHA has accrued over 6,000 vacancies of staff charged with turning over empty apartments. As a result, year after year, more apartments lie empty for longer periods of time, which in turn increases the

number of tenants on NYCHA's waitlists and the duration of their waiting period.

As causes for this problem, media reporting, city council hearings, and federal monitors have pointed to managerial missteps, corruption, and NYCHA's inefficient use of its existing resources, whereas NYCHA typically blames the federal government for lack of funds. Reasons notwithstanding, **what is clear is that vacant units are in a crisis state** and, therefore, NYCHA must fix this problem with the highest level of priority, not only for GBV survivors in its waitlists, but for so many other tenants in

vulnerable states waiting for apartment transfers, including people living with disabilities or elderly tenants needing more space to accommodate caretakers, to name a few.

“I put up a strong facade for my children, but every day I’m terrified of what this person might do next.”

-Elizabeth (waiting two-and-a-half years for a transfer)

Hire a VAWA Coordinator and Partner with CBOs

During their years-long tenure in NYCHA’s emergency transfer waitlists, our organization’s clients have been subjected to repeated threats to their safety and even physical attacks that have landed them in the hospital. All of these incidents went unaddressed because survivors living in NYCHA do not have anyone to ask for help when harmful incidents take place during their waiting period for an emergency transfer.

In its report, the GAO highlighted the need for public housing authorities to hire VAWA coordinators precisely to prevent incidents such as what GBV survivors at NYCHA have gone through.

Throughout the entire emergency transfer process, NYCHA must ensure that survivors receive the services and support they need to be safe while they wait for a transfer. NYCHA must hire a VAWA coordinator to work internally within the agency and externally with community partners to protect survivors. Partnerships with Community Based Organizations (“CBOs”) that serve survivors can open up safety planning, guidance, and advocacy services for survivors in culturally-specific ways. Survivors who decide to opt-into these services should be allowed to have an advocate on their side to assist them while they wait for their emergency transfer.

Expand the Transfer Options for Survivors

NYCHA’s Section 8 Administrative Plan requires survivors to have been on transfer waitlist for *three years* before they can be eligible for a Section 8 voucher. NYCHA cannot force survivors to wait three years in order to qualify for a section 8 voucher given the risks they face of bodily harm or even death.

Survivors must be given the option of a section 8 voucher, not three years into their waiting period for a transfer, but at the outset.

In addition, NYCHA must give survivors the opportunity to transfer across its entire housing

portfolio—public housing, RAD/PACT buildings, Public Housing Preservation Trust buildings, and Section 8 vouchers. This will greatly expand the pool of available apartments for survivors thereby speeding up their transfer. Tenants in vulnerable positions—including those living with disabilities and GBV survivors—should not be confined to only transfer within their specific program. To the contrary, they should be afforded the widest array of transfer options in order to reach safe and suitable housing as quickly as possible.

Accelerate an Emergency Transfer if the Survivor is Homeless

Though every GBV survivor faces serious risks to their safety, some have heightened risk exposure. In particular, every risk, every challenge, every adversity survivors already face is exacerbated by homelessness. Abuse plus

homelessness is a double harm and, therefore, NYCHA must implement a mechanism to prioritize the transfer of survivors whose risk exposure is so high that they cannot even live in their home any longer.

Conclusion

Throughout this report, we will show that survivors of gender-based violence are uniquely situated in terms of the risks they face while they wait for an emergency transfer and, because of that, NYCHA has a legal and moral obligation to change its policies and procedures to protect survivors.

Right now, NYCHA is doing the opposite—it has placed emergency transfer requests at the

bottom of its transfer priority list and has otherwise not allocated any resources to providing services and support to its residents who are survivors of gender-based violence.

The time for NYCHA to change course on this issue is now.

People's lives are on the line. Survivors cannot afford to wait.

Sarah's story

Sarah is an African American woman, a single mother of three children, and a public housing resident for over a decade.

In November 2021, Sarah requested an emergency transfer after suffering abuse at the hands of the father of her children. Her transfer was approved in December 2021 and she was placed in the Manhattan waitlist for a 3-bedroom apartment. She was not given any estimate of how long it would be before her relocation. Neither was she informed of other types of transfer options that could have moved faster, such as selecting the “all-borough” transfer option or making a reasonable accommodation transfer request.

A few months into her waiting period, Sarah was violently attacked in the neighborhood by a person associated with the father of her son, landing in the hospital for a week. Upon being discharged, Sarah went to the management office at her development to inform them that she suffered a violent attack and to ask that her transfer be expedited to protect her and her children’s safety. She was told by personnel at the management office that the transfer was handled by NYCHA’s central office and thus there was nothing they could do to expedite her transfer. She was not given any information about who she could contact at the central office or otherwise what else she could do to speed up her emergency transfer.

As a result of the violent attack she experienced and NYCHA’s unwillingness to protect her safety by speeding up her transfer request, Sarah was forced to leave her decade-long home and move into a homeless shelter in Brooklyn with her three children.

In December 2022—one year into her waiting period for an emergency transfer—the homeless shelter referred Sarah’s case to our office. Upon accepting the case and contacting NYCHA’s Law Department to inquire about the status of Sarah’s emergency transfer, we were told that there were 130 survivors ahead of Sarah still waiting on their own transfers. Until she started working with our organization, Sarah had no idea how far down she was still on the waitlist even a year into her waiting period. GBV survivors like Sarah in NYCHA’s waitlists are not given such information—only attorneys.

Upon learning that Sarah was undergoing therapeutic treatment in connection with the abuse incidents, we assisted Sara with a reasonable accommodation transfer request under the Americans with Disabilities Act and the Fair Housing Act. Once such request was approved by NYCHA, she made a dramatic jump from #130 on the emergency transfer waitlist to #2 on the reasonable accommodation transfer waitlist. About two months later (Summer 2023), NYCHA identified a vacant apartment for Sarah and relocated her.

The accelerating effect the reasonable accommodation transfer request had on Sarah’s apartment transfer is the result of NYCHA giving a higher priority to reasonable accommodation transfers than it does to emergency transfers. Sarah’s case illustrates the harm to survivors from NYCHA placing them *so low* in the transfer priority ranking.

Why Survivors Must Reach Safety as Quickly as Possible

In a recent article published by the New York Times, NYCHA said that it treated requests from victims of violence just like it would several other types of transfer requests, including from crowded apartments.³ NYCHA does treat emergency transfer requests by survivors of gender-based violence the same way it treats any transfer request by any other tenant—when such a transfer is approved, the survivor is placed on the corresponding waitlist and essentially never contacted again until their number has come up.⁴ During their years-long wait for a transfer apartment, survivors are regularly exposed to the threat of violence or even actual violence in response to which NYCHA takes no action to protect survivors. What this shows is that NYCHA does not take into account the lived experiences of survivors, their exposure to danger, or the myriad ways in which intimate partner violence inflicts long-lasting damage to themselves and their children. NYCHA must stop treating emergency transfer requests just like it would several other types of transfer requests and instead implement systems and protocols to attend to the unique challenges faced by GBV survivors awaiting emergency transfers.

Much has been written about the lived experiences of survivors in terms of their constant exposure to various forms of abuse, homelessness, or even death. Notably, New Destiny Housing recently published a report titled “A Crisis Compounded: The Dual Crises of Domestic Violence and Homelessness” that vividly illustrates life as a survivor of domestic violence, including:⁵

- Domestic violence results in longstanding physical and emotional health complications. According to the CDC, asthma, irritable bowel syndrome, frequent headaches, chronic pain, traumatic brain

injury, post-traumatic stress disorder, and depression, among other physical and mental health conditions, are all more frequent amongst DV survivors compared to those without a history of exposure to such violence.⁶

- Domestic violence deeply impacts children. Children of survivors are more likely to experience mood and anxiety disorders, post-traumatic stress disorder, and substance abuse as adults. They are also more likely to repeat the cycle of violence as adults.⁷
- Access to safe and affordable housing is one of the most urgent concerns for survivors and often determines whether they are able to escape an abusive environment or must live through it until they have somewhere safe to go.⁸
- Domestic violence pushes thousands of individuals and families into the city’s shelter system every year, making it a leading cause of shelter entry, above evictions. The vast majority of such families are headed by Black or Latinx mothers.⁹
- More than 94% of survivors endure economic abuse, which has long lasting effects to survivors' savings and credit score which further limit their ability to secure safe housing or cover essentials, like food.
- For survivors, safe housing is a matter of life and death.¹⁰

In addition, NYCHA should not ignore the exacerbating effect of the COVID-19 pandemic on the risks faced by GBV survivors. While implemented to slow down the spread of the virus, the lockdown orders saw instances of reported intimate partner violence increase by

8.1%,¹¹ in large part because of increased stress and anxiety as a result of parents and children being confined to their homes.¹² Additionally, stay-at-home orders restricted physical access to the workplace which resulted in numerous businesses shutting down and therefore high unemployment.¹³ Combined, increased confinement to the home and the economic impact of the pandemic exacerbated the factors that are associated with intimate partner violence—increased male unemployment, the stress of childcare and homeschooling, increased financial insecurity, and maladaptive coping strategies such as alcohol and substance abuse.¹⁴ These heightened factors in turn increased the risk of abuse and escalated the level of violence for both women who previously experienced violence from their

intimate partners and those who had previous non-violent partners.¹⁵

The lived experiences of GBV survivors are in many ways unique within the population of NYCHA residents. Their exposure to danger while they are waiting for their emergency transfer exceeds that of mostly any other public housing tenants. In the words of Gabriela Sandoval Requena, Policy and Communications Director at New Destiny Housing, “[d]eath is a real risk for survivors of domestic violence if they have nowhere to go.”¹⁶ Therefore, NYCHA must effectuate changes to its policies and practices to treat survivors with dignity and respect. We outline such changes in detail in section 6 of this report.

Jessica's story

Jessica is a Latinx woman, a single mother of one child, and a public housing resident over the past 6 years.

Jessica requested an emergency transfer in early 2021. She was offered an apartment in a brief two months' time, but the apartment had floor-to-ceiling mold issues and was therefore unlivable. Jessica informed NYCHA of this issue and was offered a second apartment shortly thereafter. The second apartment, however, was also in a deplorable state and could not be healthily occupied by Jessica and her children, who have undergone medical treatment in connection with the abuse incidents for years.

Upon informing NYCHA that this second apartment was also unlivable, NYCHA removed Jessica from the emergency transfers waitlist altogether. In other words, NYCHA blamed Jessica for rejecting two unlivable apartments and canceled her transfer. NYCHA's policies allow a survivor to reject a second apartment offer without being removed from the waitlist if the survivor explains in writing why both apartments offered are unsuitable.¹⁷ However, no one explained this procedure to Jessica or provided her with a form to fill out so that she could explain why she rejected the apartments NYCHA offered.

On top of having no choice but to continue living in an unsafe apartment, Jessica was left with the frustration of unfairly having her emergency transfer canceled. NYCHA offered her two apartments that were uninhabitable and then punished her for rejecting them.

In late 2023, Jessica survived a new incident of intimate partner violence leading to a second emergency transfer request. NYCHA approved the transfer and placed her on the 2-bedroom waitlist for the borough of Brooklyn. Jessica was not given any estimate of how long it would be before her relocation. Neither was she informed of other types of transfer options she could have chosen, including selecting the "all-borough" transfer list or a reasonable accommodation transfer for survivors undergoing medical treatment. Our organization and New Destiny Housing are currently working with Jessica to explore a reasonable accommodation transfer request or the possibility of a portable section 8 voucher.

Counting from when she requested her first emergency transfer in late 2021, Jessica has been waiting to reach a safe home for three years.

The State of Emergency Transfers Nationally and in NYC

Housing Protections for Survivors under the Violence Against Women Act

In recognition of the strong link between gender-based violence and housing instability, the Violence Against Women Act (“VAWA”) provides several important protections for survivors. One key provision introduced with the VAWA Reauthorization Act of 2013 is the requirement that all covered housing providers implement emergency transfer plans that allow survivors to transfer to different subsidized units when they believe their safety is threatened due to gender-based violence.

VAWA, first enacted in 1994, was passed by Congress to combat violence and crimes against women.¹⁸ The reauthorization of the Act in 2005 and 2013, added, in part, housing protections for survivors living in public housing and other forms of federally subsidized housing.¹⁹ In reauthorizing the Act, Congress recognized the strong link between gender-based violence and housing instability and that “[w]omen and families across the country are being discriminated against, denied access to, and even evicted from public and subsidized housing because of their status as [survivors] of domestic violence.”²⁰ VAWA seeks to promote housing stability for survivors by adding specific housing rights which include preventing discrimination²¹ and requiring housing providers to create emergency transfers plans to support survivors who need to transfer to another unit if they believe their safety is threatened.²²

All federal agencies that operate housing covered under VAWA are responsible for its implementation. For housing administered by Public Housing Authorities (“PHA”), HUD requires PHAs to implement an emergency transfer plan which gives a tenant who is a survivor of gender-based violence the ability to

relocate from their current subsidized unit to a new subsidized unit that the tenant believes is safe.²³ The emergency transfer plan must allow a tenant to make an internal emergency transfer when a safe unit is immediately available.²⁴ Given the limited availability of vacant units, the emergency transfer plan must also adopt policies that allows a tenant to choose an internal or external transfer,²⁵ or both,²⁶ and describe what efforts will be made to assist a tenant in making internal and external transfers when a safe unit is not immediately available.²⁷ The emergency transfer plan must explain the priority given to VAWA transfers in relation to other transfer categories.²⁸

Crucially, HUD regulations require that emergency transfer plans ensure that internal emergency transfers be given, “at a minimum, any applicable additional priority that [it] may already provide to other types of emergency transfer requests.”²⁹

The reauthorization of the Act in 2022 strengthened housing protections for survivors in several important ways, including requiring HUD to implement and enforce regular compliance reviews that examine covered housing providers’ compliance with the Act, including PHAs’ compliance with emergency transfer requirements.³⁰ In response to the 2022 VAWA reauthorization, HUD’s Office of Public and Indian Housing created a VAWA compliance checklist to use in its compliance reviews and this includes questions about what efforts are taken by PHAs to assist survivors in external transfers.³¹ In addition, the 2022 VAWA reauthorization established a Gender-Based Violence Prevention Office at HUD which

is tasked, in part, with coordinating, implementing and advancing housing protections for survivors of gender-based

violence, as well as monitoring and addressing compliance failures with the Act.³²

The United States Government Accountability Office: “Opportunities Exist to Improve Oversight of Assistance to Survivors of Domestic Violence or Sexual Assault”

The United States Government Accountability Office (“GAO”) examined emergency transfer plans from a sample of 60 housing providers nationwide that are covered by VAWA.³³ It presented its findings in a report, entitled “Opportunities Exist to Improve Oversight of Assistance to Survivors of Domestic Violence or Sexual Assault,” to congressional committees. GAO was tasked, in part, with identifying PHAs that have implemented emergency transfer plans, reporting on their processes and identifying best practices for effective implementation in compliance with VAWA.³⁴

GAO found that housing providers face multiple challenges that contribute to long wait times—as much as 6 months to 1 year—for the completion of emergency transfers requests.³⁵ These challenges include differing eligibility requirements across programs and properties,³⁶ limited vacancies for appropriate units,³⁷ limited training for staff in the realm of gender-based violence and sexual assault, which leads to stigmatization of survivors and skepticism over the emergency nature of these transfer requests,³⁸ limited training for staff in the dynamics of gender-based violence and VAWA-specific regulations,³⁹ and a lack of coordination among housing providers about available vacant units outside of their own portfolios.⁴⁰ In 2023, HUD found VAWA-related emergency transfer issues in about half of the PHA reviews analyzed that year.⁴¹

Limited vacancies in public housing are especially problematic as they contribute to

long wait times even when a survivor is given priority over other transfer requests.⁴² The long wait times present a survivor waiting for an emergency transfer with a dire challenge, as it could mean risking homelessness,⁴³ paying for unaffordable alternative housing, or staying with the perpetrator of abuse while waiting for a new subsidized unit.⁴⁴

GAO identified certain of the strategies used by certain PHAs to overcome the delays in VAWA emergency transfers and to streamline the process for easier navigation. The strategies identified focus on the use of vouchers,⁴⁵ prioritizing survivors’ transfer requests,⁴⁶ training staff on gender-based violence and VAWA-specific requirements,⁴⁷ hiring a VAWA coordinator as a single point of contact to process emergency transfers requests and support survivors in the process of transferring to a safe unit,⁴⁸ and creating formal coordination methods across housing providers to facilitate external transfers.⁴⁹ As this report lays out, NYCHA has *not* pursued many of these strategies identified by GAO.

As indicated above, HUD regulations require that internal emergency transfers⁵⁰ be given at least the same priority as other emergency transfer requests,⁵¹ which, according to GAO’s report, “can include physical hazards (such as fire damage or a gas leak), natural disasters, or a verified medical condition of a life-threatening nature.”⁵² While most (two-thirds) of the selected housing providers gave some priority to survivors of gender-based violence,⁵³ two

PHAs, the Oakland Housing Authority and the Boston Housing Authority, place emergency transfers at the top of the waitlist, in the case of Oakland, or a “super-priority,” in the case of Boston. By policy design, GBV survivors in Oakland and Boston are given the highest priority to receive the next available suitable apartment. NYCHA should look to these localities for examples of how it can give emergency survivors transfer a much higher priority in New York City.

Vouchers were highlighted by GAO as especially useful when there are no vacancies within a PHA and for large families who need three or more bedrooms.⁵⁴ One PHA reports having a number of vouchers “in reserve for extreme situations”.⁵⁵ Another PHA uses vouchers to enter into a lease on behalf of survivors, and another partners with nonprofit organizations

specializing in supporting survivors of gender-based violence by allocating vouchers to be used by the organization for survivors experiencing homelessness or at risk of homelessness.⁵⁶ NYCHA forces survivors to *wait three years before* they can become eligible for a section 8 voucher.

Formalizing coordination across PHAs and other housing providers was also highlighted as a useful strategy by GAO. This included a statewide pilot program, implemented by HUD in partnership with a local housing advocacy group, that created a database of available units across project based rental assistance (“PBRA”) properties, streamlining the application process by maintaining emergency transfer request information in a centralized location and giving survivors priority for available units.⁵⁷

New York City Council Hearing on Emergency Transfer Delays

On March 13, 2023, the City Council’s Committee for Public Housing held a hearing on NYCHA’s Fiscal Year 2024 Preliminary Budget.⁵⁸ At the hearing, NYCHA testified that of its 2,330 pending emergency transfer requests, 76% fall under VAWA.⁵⁹ This means that about 1,770 survivors of gender-based violence are waiting for NYCHA’s vacant units to be ready for occupancy.

Meanwhile, there is a significant backlog of vacant apartments not yet deemed ready for occupancy. In December 2022, there were 3,300 vacant apartments, according to NYCHA’s own data,⁶⁰ and that number grew to over 5,000 units in 2023.⁶¹

NYCHA’s delays in vacant unit readiness are “wholly unacceptable given the housing crisis and given the urgency of all these needs. It is a domestic violence issue. It is a gender justice issue.”

- Councilmember Alexa Aviles⁵⁹

Elizabeth's story

Elizabeth is a Latinx woman, a mother of four children, and a public housing resident of nearly a decade.

Elizabeth requested an emergency transfer in early 2022 after suffering ongoing harassment at the hands of a neighbor living in her development. Her transfer was shortly approved and Elizabeth was placed in the Manhattan waitlist for a 4-bedroom apartment. She was not given any estimate of how long it would be before her relocation. Neither was she informed of other types of transfer options she could have chosen, including selecting the “all-borough” transfer list or a reasonable accommodation transfer for survivors undergoing medical treatment.

At least once a quarter during her two-and-a-half years’ wait, Elizabeth has called NYCHA’s hotline to ask about the status of her emergency transfer. Every time she calls, she receives zero information about where she is in the waitlist or how much longer her transfer will take. All she hears is, “you’ll get transferred when you get transferred.”

Meanwhile, the perpetrator of abuse is still living in her development, causing Elizabeth constant stress, fear, and anxiety. Recently, the perpetrator approached her daughter and made insulting comments about Elizabeth, which further raised Elizabeth’s fear for her safety and that of her children. When asked how she feels about this situation, Elizabeth responded: “I put up a strong facade for my children, but every day I’m terrified of what this person might do next.”

Elizabeth’s case was referred to LSNYC by a community partner two years into her waitlist tenure. Upon inquiring NYCHA’s Law Department about the status of Elizabeth’s emergency transfer request, we were told that there were more than 60 survivors ahead of her in the Manhattan 4-bedroom waitlist. Upon discussing with Elizabeth the possibility of a change in her transfer preferences to speed up her request, we communicated to NYCHA that Elizabeth was willing to switch to the “all-borough” 3-bedroom waitlist. NYCHA effectuated the change but the “bump” Elizabeth received on her waitlist placement was minimal. Elizabeth would have had no idea about how to speed up her transfer request, even minimally, because, again, NYCHA gives zero information to survivors about where they are in the waitlist or options they may have to speed up their requests.

And so, after 29 months’ worth of a wait, there are still dozens of survivors ahead of Elizabeth on the emergency transfer waitlist. There is no end in sight for her.

NYCHA’s Failures and Policy Recommendations

NYCHA Must Give Emergency Transfer Requests a Much Higher Priority

Entirely within its control, NYCHA has decided to place emergency transfers in its lowest priority category. Here is a simplified version of NYCHA’s transfers priority ranking:⁶²

Transfer Reason	Priority Category	Emergency? ⁶³
Apartment has become uninhabitable	First	Yes
There are unoccupied rooms in the apartment and the tenant is required to move to a smaller apartment pursuant to an administrative decision	Second	No
Tenants relocated due to renovations and has a right to return to their original apartment	Third	No
Tenants relocated for development or unit renovation work	Third	No
Tenants needing continuing medical care within 60 minutes travel time	Third	In some cases
Tenants needing external home care within 60 minutes travel time	Third	In some cases
Tenants needing an extra bedroom to accommodate a hospital bed or mental health treatment	Third	In some cases
Disabled tenants in a non-elevator building who wish to move to a lower floor	Third	No
Disabled tenants wishing to move to a lower floor in an elevator or non-elevator building	Third	No
Disabled tenants needing an accessible apartment	Third	In some cases
Disabled tenants needing a reasonable accommodation	Third	In some cases

Tenants in extremely under-occupied or under-occupied apartments	Lowest	No
Tenants in extremely over crowded or crowded apartments	Lowest	No
Tenants living in elderly buildings who are not elderly	Lowest	No
Emergency transfers	Lowest	Yes
Tenants living in an apartment in which a household member died	Lowest	No
Tenants referred by the Administration of Children Services for family reunification	Lowest	No
Tenants with long term friction with neighbors	Lowest	No
Tenants willing to provide home health care to a relative in another development	Lowest	No
Tenants required to travel more than 90 minutes for work	Lowest	No
Elderly tenants wishing to move to an elderly development	Lowest	No
10 different categories of new apartment applicants	Lowest	No

Several things are worth noting from this priority list. First, there are 11 transfer reasons in the first, second, and third transfer categories that come ahead of emergency transfers. According to the Applications and Tenancy Administration Department’s (“ATAD”) 2023 Annual Report, in 2023, there were **18,998** tenants on NYCHA’s transfer and new applicant waitlists, as follows:⁶⁴

Type of Transferees or New Applicants	Amount as of 12/31/2023
Transferees	
TO (first, second, and third priority categories)	2,624
T1-D and T2-A	1,743
T3-A and T4-A	2,498
All other T1, T2, T3, and T4 (includes roughly 1,800 GBV survivors)	3,348
Transferees Subtotal	10,213
New Applicants	
Need Based	4,863
Working Families	3,922
New Applicants Subtotal	8,785
Total Transferees and New Applicants	18,998

In 2023, there were **2,624** tenants on the T0 transfer waitlists, which comprises the first, second, and third categories in Table 1 above.⁶⁵ According to NYCHA’s rules, all of these 2,624 tenants, none of them GBV survivors, *must be transferred first* before the system gets to the transferees in the last category, which includes emergency transfers.⁶⁶ This scheme already sets survivors up for long transfer waiting periods, but that is not all.

On the last transfer category, NYCHA’s system cycles through roughly 20 different types of transfer or new applicant categories.⁶⁷ According to the 2023 ATAD Annual Report in 2023 (Table 2), there were 7,539 non-T0 transfer applicants and 8,785 new applicants on NYCHA’s waitlists, for a total of **16,374**. That is, because of the way that NYCHA’s system cycles through all of the transferee and new applicants in the last category, the roughly 1,800 survivors

awaiting an emergency transfer in 2023 had the same priority level as roughly 14,000 other tenants who did not face the risk level that survivors face.

In other words, by placing emergency transfers in the last transfer category, NYCHA has sanctioned roughly 1,800 GBV survivors to wait until more than 2,600 non-survivor tenants get their apartments first, only to then cycle through a list of transferee and new apartment applicants with more than 16,000 tenants in it, the majority of them non-survivors.

It is no surprise that GBV survivors wait anywhere from one to three years, or more, for an emergency transfer, all the while they are constantly exposed to, or suffer actual, harm.

Second, as indicated above, federal regulations require NYCHA to give emergency transfers as high a priority as it gives other types of

emergency transfers.⁶⁸ NYCHA does not call anything else an “emergency transfer”—only transfers under VAWA or intimidated witness transfers. However, in its report, the Government Accountability Office illustrated other types of emergency transfers to include “...physical hazards (such as fire damage or a gas leak), natural disasters, or a verified medical condition of a life-threatening nature.”⁶⁹ Using this criteria and as shown in Table 1 above, most transfers that NYCHA has placed above emergency transfers are not emergencies—*e.g.*, requests to transfer because the tenant has empty rooms in their home, or lives in a seniors’ building without being elderly, or seeks to return to their prior home after being relocated for renovations—which means that NYCHA is in violation of federal regulations in this regard.

Third, NYCHA labels transfers as either mandatory or voluntary and generally gives a

higher priority to the former. Tellingly, NYCHA considers transfer requests under the Violence Against Women Act or for a reasonable accommodation “voluntary.”⁷⁰ This label overlooks the fact that GBV survivors who qualify for a transfer need to reach a safe home, or disabled individuals who qualify for a reasonable accommodation transfer need to treat their medical conditions. There is nothing “voluntary” about transfer requests in these scenarios. NYCHA should rethink how it approaches transfer requests by tenants, especially those who must transfer as the only means to live safe and healthy lives.

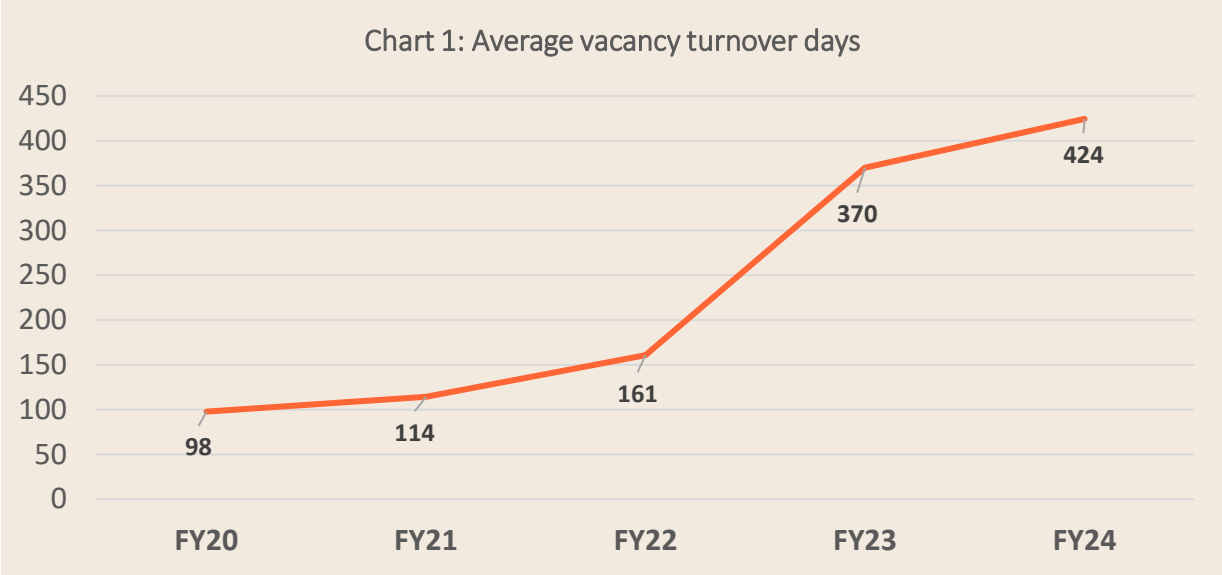
To be sure, NYCHA created its transfers priority list and it is entirely within its control to change it to give GBV survivors a much higher priority and ensure that there are no non-emergency transfers above emergency transfers.

NYCHA Must Fix Its Vacant Units Crisis

In a city council budget hearing held in March 2023, NYCHA’s Chief Operations Officer, Eva Trimble, responded as follows to Council Member Aviles’ question regarding how long do tenants seeking a VAWA transfer are on average waiting for: “I don’t have that information in front of me right now, but those transfers are waiting for the vacant units that

we’ve been discussing, so there is significant time they they’re waiting for the transfer process.”⁷¹

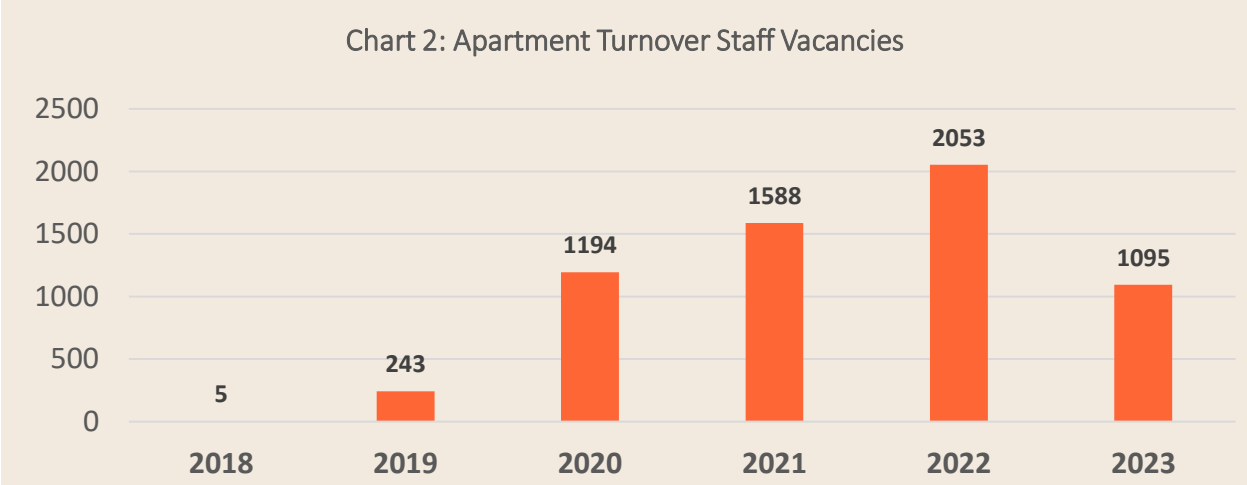
The subject of New York City Council hearings and media reporting, the average amount of days it takes NYCHA to re-rent vacant units has skyrocketed over the past five years:⁷²



NYCHA’s turnover rate—the average number of days it takes NYCHA to complete repairs in a vacant apartment and re-rent it—rose from **98 days** in FY20 to **424 days** in FY 24, a **337% increase**. Meanwhile, more than 5,000 apartments across NYCHA sat vacant in 2023, all the while nearly 19,000 apartment applicants (about half transferees and half new applicants) were on NYCHA’s waitlists.⁷³

In other words, year after year, more apartments lie empty for longer periods of time,

which in turn increases the number of tenants on NYCHA’s waitlists and the duration of their waiting period. NYCHA blames most of this crisis on insufficient federal funding to conduct the necessary repairs and rehabilitation of apartments during a vacancy. In response to a Freedom of Information Law request presented by our organization, NYCHA revealed that between 2018 and 2023, it accumulated over 6,000 vacancies of staff charged with working on turning over vacant apartments across the system.⁷⁴



Starting with only five staff vacancies in 2018, vacancies steadily grew year-after-year reaching 2,053 in 2022. Through 2023, the accumulated number of apartment turnover staff vacancies was **6,178**. Whether this level of staff vacancies is due to insufficient federal funding, mismanagement, the COVID-19 pandemic, or all of the above, there is no question that this is an enormous void in NYCHA's apartment turnover operations.

To add to the above, media reporting and city council hearings have pointed to a series of managerial missteps as significant contributors to the vacant units crisis.⁷⁵ Plus, dispelling NYCHA's attempts to blame all of its woes on "insufficient federal funding," two different

federal monitors have called out NYCHA's culture of mismanagement in terms of failing to fix many of its operational problems with the resources it *has* in hand, regardless of how much funding the agency is owed.⁷⁶

Notwithstanding who or what is to blame for NYCHA's vacant units crisis, what is clear is that it is a crisis that NYCHA must fix with the highest level of priority, not only for GBV survivors in its waitlists, but for so many other tenants in vulnerable states waiting for apartment transfers, including people living with disabilities or elderly tenants needing more space to accommodate caretakers, to name a few.

NYCHA Must Hire a VAWA Coordinator and Partner with CBOs

One of the themes of this advocacy report is that NYCHA, as it recently acknowledged in a New York Times article,⁷⁷ treats emergency transfers just like it would several other types of transfer requests. However, this report shows that the safety threats faced by GBV survivors are in many ways unique and, as such, require individualized attention on NYCHA's part.

As told in the individual survivor stories, Sarah was physically attacked during the time that she waited for an emergency transfer—NYCHA did nothing. Jessica suffered a second abuse incident leading to a second emergency transfer request—NYCHA did nothing. Elizabeth's daughter was threatened during the time she was waiting for an emergency transfer—NYCHA did nothing.

All of these regrettable incidents went unaddressed because survivors living in NYCHA do not have anyone to ask for help when harmful incidents take place during their waiting period for an emergency transfer. They go to their development management offices to

seek help or try to get their transfers sped up when they experience danger or actual harm, but are told nothing can be done about it. In its report, the GAO highlighted the need for PHAs to hire VAWA coordinators precisely to prevent incidents such as what GBV survivors at NYCHA have gone through.

Throughout the entire emergency transfer process, NYCHA must ensure that survivors receive the services and support they need to be safe while they wait for a transfer. NYCHA must hire a VAWA coordinator to work internally within the agency and externally with community partners to protect survivors. Partnerships with Community Based Organizations ("CBOs") that serve survivors can open up safety planning, guidance, and advocacy services for survivors in culturally-specific ways. Survivors who decide to opt into these services should be allowed to have an advocate on their side to assist them while they wait for their emergency transfer. Our work with clients concerning emergency transfers, a lot of which we have done in coordination with

service providers such as New Destiny Housing and Violence Intervention Program, has shown the value of survivors having an advocate on their side as they are navigating the waiting periods associated with an emergency transfer.

NYCHA should hire a VAWA coordinator with the highest priority to coordinate all of this work.

NYCHA Must Expand the Transfer Options for Survivors

Currently, NYCHA's Section 8 Administrative Plan requires survivors to have been on the NYCHA emergency transfer waitlist *for three years* or more before they can be eligible for a Section 8 voucher.⁷⁸ This does not make sense. Given that they are at risk of bodily harm or even death, NYCHA cannot force survivors to wait three years in order to qualify for a section 8 voucher. Rather, NYCHA should offer such opportunity at the outset.

In addition, NYCHA must give survivors the opportunity to transfer across its entire housing portfolio—public housing, RAD/PACT buildings,⁷⁹ Public Housing Preservation Trust buildings,⁸⁰ and Section 8 vouchers. This will greatly expand the pool of available apartments for survivors thereby speeding up their transfer. Our organization's work on behalf of clients living with disabilities has shown that, once their public housing building is transferred to the RAD/PACT program, their ability to request a reasonable accommodation transfer request

remarkably shrinks—whereas previously they could seek a transfer to any other public housing development in order to treat their disability, post-conversion they can only transfer within the limited portfolio operated by the private RAD/PACT landlord. Tenants in vulnerable positions—including those living with disabilities and GBV survivors—should not be confined to only transfer within their specific program. To the contrary, they should be afforded the widest array of transfer options in order to reach safe and suitable housing as quickly as possible.

For a variety of reasons, not every survivor may want to abandon their status as a public housing tenant to live in a RAD/PACT building or look for an apartment in the private rental market with a section 8 voucher. However, survivors should be given a wide array of transfer options and be allowed to choose what is right for them.

NYCHA Must Accelerate an Emergency Transfer if the Survivor is Homeless

Four months into her waiting period for an emergency transfer, Sarah suffered a violent attack and landed in the hospital. Before needing to move to a homeless shelter as it was no longer safe for her and her children to continue living in the neighborhood, she went to her management office to ask that her emergency transfer be expedited. NYCHA did nothing.

It is unacceptable that NYCHA has no system in place to accelerate an emergency transfer when a survivor suffers harm and is forced to relocate to a homeless shelter. Every risk, every challenge, every adversity GBV survivors already face is exacerbated by homelessness. NYCHA must implement a mechanism to prioritize the transfer of survivors whose risk exposure is so high that they cannot even live in their home

any longer. Although survivors have arguably the highest risk exposure of any type of NYCHA transferee, within the category of emergency transfers there are differences in risk exposure.

Therefore, NYCHA must implement mechanisms to identify these differences and provide individualized, trauma-informed services to survivors.

Frances' story

Frances is an African American woman, a single mother of three children, and a public housing resident for the past five years.

Frances was approved for an emergency transfer in the Spring of 2022. She was placed in the Manhattan waitlist for a 3-bedroom apartment. She was not given any estimate of how long it would be before her relocation. Neither was she informed of other types of transfer options she could have chosen, including selecting the “all-borough” transfer list or a reasonable accommodation transfer for survivors undergoing medical treatment.

Two and a half years later, Frances awaits her transfer and has no idea when it will take place. With the assistance of New Destiny Housing, Frances applied for a section 8 voucher which was approved only after repeated attempts by New Destiny Housing and our organization to have NYCHA properly credit rent payment Frances had made (NYCHA was using nonexistent arrears as a reason to not approve Frances' voucher request). NYCHA's repeated refusal to approve the voucher due to its own failure to properly credit Frances' rent payments was, itself, a traumatic experience for her given that she has been waiting for an emergency transfer for more than two and a half years. Thankfully, she now has a section 8 voucher and the assistance of New Destiny Housing to find an apartment in the private rental market, but the majority of the more than 2,500 survivors still awaiting an emergency transfer do not have such luxury.

Conclusion

Throughout this report, we have shown that survivors of gender-based violence are uniquely situated in terms of the risks they face while they await a NYCHA apartment transfer, and because of that, NYCHA has a legal and moral obligation to change its policies and procedures to protect survivors. Right now, NYCHA is doing the opposite—it has placed emergency transfer

requests at the bottom of its transfer priority list and has otherwise not allocated any resources to providing services or support to residents who are GBV survivors.

The time for NYCHA to change course on this issue is now. People's lives are on the line. Survivors cannot afford to wait.

Endnotes

¹ We use the term “gender-based violence” (“GBV”) throughout this report to follow the nomenclature in the Violence Against Women Act Reauthorization Act of 2022 for intimate partner violence, dating violence, sexual assault, and stalking. We intend for GBV to be read broadly, including violence against LGBTQIA+ individuals.

² NYCHA’s emergency transfers category includes GBV survivors seeking transfers under VAWA and other tenants seeking transfers under the categories of intimidated witness, intimidated victim and traumatic incident. See New York City Housing Authority, Protections for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking, *available at* <https://www.nyc.gov/site/nycha/residents/vawa-resources.page>. As of September 2024, 2,590 tenants were on NYCHA emergency transfer waitlists. 76% of these, or roughly 2,000, were tenants seeking transfers under VAWA. See NYCHA’s Fiscal Year 2024 Preliminary Budget Hearing, *available at*, https://councilnyc.viebit.com/vod/?s=true&v=NYCC-PV-CH-COM_230313-144047.mp4.

³ Sara Ruberg, *Abused in Public Housing, Victims Often Face a Long Wait to Move*, The New York Times, September 18, 2024, *available at* <https://www.nytimes.com/2024/09/18/us/domestic-violence-victims-affordable-housing.html?searchResultPosition=1>.

⁴ NYCHA canvasses all of its transfer waitlists annually, not to understand the needs of tenants on the waitlist and tailor services appropriately, but to require tenants to indicate whether they are still interested in the transfer. If they fail to respond to NYCHA’s letter, they are removed from the waitlist. New York City Housing Authority, *Admissions and Continued Occupancy Policy*, Chapter 4(g), *available at* <https://www.nyc.gov/site/nycha/residents/acop/chapter-4.page>. If anything, this canvassing procedure ends up hurting survivors who may not respond to NYCHA’s letters for myriad reasons, including being homeless and therefore not able to receive such letter.

⁵ New Destiny Housing, *A Crisis Compounded: The Dual Crises of Domestic Violence and Homelessness*, *available at* <https://newdestinyhousing.org/wp-content/uploads/DV-Report-1.pdf>.

⁶ *Id.* at 6.

⁷ *Id.* at 10.

⁸ *Id.* at 5.

⁹ *Id.* at 7-8.

¹⁰ *Id.* at 18.

¹¹ Council on Criminal Justice, *Domestic Violence During Covid-19* (Feb. 2021), *available at* <https://counciloncj.org/wp-content/uploads/2024/06/Domestic-Violence-During-COVID-19-February-2021.pdf>

¹² Press Release: UN Women Raises Awareness of the Shadow Pandemic of Violence Against Women During COVID-19, UN Women, *available at* <https://www.unwomen.org/en/news/stories/2020/5/press-release-the-shadow-pandemic-of-violence-against-women-during-covid-19> (May 27, 2020); Alex R. Piquero et al., *Domestic Violence During the COVID-19 Pandemic – Evidence from a Systematic Review and Meta-Analysis*, *Journal of Criminal Justice* (2021), <https://www.sciencedirect.com/science/article/pii/S004723522100026X?via%3Dihub>

¹³ Piquero et al. *supra* note 23.

¹⁴ *Id.*; Council on Criminal Justice *supra* note 30.

¹⁵ Piquero et al. *supra* note 31.

¹⁶ Sara Ruberg, *Abused in Public Housing, Victims Often Face a Long Wait to Move*, The New York Times, September 18, 2024, *available at* <https://www.nytimes.com/2024/09/18/us/domestic-violence-victims-affordable-housing.html?searchResultPosition=1>.

¹⁷ New York City Housing Authority, *Admissions and Continued Occupancy Policy*, Chapter 10(J), *available at* <https://www.nyc.gov/site/nycha/residents/acop/chapter-10.page>

¹⁸ P. L. No. 103-322. 108 Stat. 1902-55; codified at 42 U.S.C.A. §13981; transferred to 34 U.S.C.A. § 12361 (2017).

¹⁹ “Welcome Home? An Analysis of Federal Housing Programs and their Efficacy in Reducing Homelessness Among Domestic Violence Survivors,” Courtney Veneri, 14 DePaul J. for Soc. Just. 1, 8 (Summer 2021).

²⁰ 34 U.S.C.A. § 12471 (3).

²¹ 34 U.S.C.A. § 12491.

²² *Id.* at (e)-(f).

²³ 24 C.F.R. § 5.2005 (e).

²⁴ *Id.* at § 5.2005 (e)(5).

²⁵ *Id.* at § 5.2005 (e)(6)-(7).

²⁶ *Id.* at § 5.2005 (e)(8).

²⁷ *Id.* at § 5.2005 (e)(6)-(7).

²⁸ *Id.* at § 5.2005 (e)(3).

²⁹ *Id.* at § 5.2005 (e)(6).

³⁰ 34 U.S.C.A 12492 § 41412(a)(1)-(2).

³¹ United States Government Accountability Office, Report to Congressional Committees, *Rental Housing, Opportunities Exist to Improve Oversight of Assistance to Survivors of Domestic Violence or Sexual Assault*, 33, July 2024, available at <https://www.gao.gov/assets/gao-24-106481.pdf>

³² 34 U.S.C.A 12492 Sec 41413(a)-(c).

³³ United States Government Accountability Office, Report to Congressional Committees, *supra*.

³⁴ *Id.* at 2 (in report, 6 pdf online version).

³⁵ *Id.* at 21 (25 online).

³⁶ *Id.* at 18, 20 (22, 24 online).

³⁷ *Id.* at 18, 20 (22, 20 online).

³⁸ *Id.* at 18, 22-24 (22, 26-28 online).

³⁹ *Id.*

⁴⁰ *Id.* at 18, 20 (22, 24 online).

⁴¹ *Id.* at 34 (38 online).

⁴² *Id.* at 21 (25 online).

⁴³ See “A Crisis Compounded: The Dual Crises of Domestic Violence and Homelessness 5 New Destiny Housing,” 3, 7 (July 2024), <https://newdestinyhousing.org/dv-report/>

⁴⁴ See United States Government Accountability Office, Report to Congressional Committees, at 22.

⁴⁵ *Id.* at 24, 26 (28, 30 online).

⁴⁶ *Id.* at 24, 27 (28, 31 online).

⁴⁷ *Id.*

⁴⁸ *Id.* at 28.

⁴⁹ *Id.* at 24.

⁵⁰ *Id.* at 6 (10 online), which explains that an internal transfer is one where the survivor is not considered a new applicant for a program, such as moving a survivor from one public housing unit to another public housing unit within the same PHA.

⁵¹ 24 C.F.R. § 5.2005 (e)(6).

⁵² United States Government Accountability Office, Report to Congressional Committees, 13 (17 online).

⁵³ *Id.*

⁵⁴ *Id.* at 26.

⁵⁵ *Id.*

⁵⁶ *Id.* 26, 27.

⁵⁷ *Id.* at 24, 25.

⁵⁸ NYCHA’s Fiscal Year 2024 Preliminary Budget Hearing, available at, https://councilnyc.viebit.com/vod/?s=true&v=NYCC-PV-CH-COM_230313-144047.mp4. Retrieved August 30, 2024.

⁵⁹ *Id.*

⁶⁰ NYC Council, “Vacancies in NYCHA Properties,” available at <https://council.nyc.gov/data/nycha-vacancy/>

⁶¹ Ari Ephraim Feldman, “Vacant NYCHA units jumped more than 600% in a year, stranding residents,” Spectrum News NY1, February 22, 2023.

⁶² New York City Housing Authority, Admissions and Continued Occupancy Policy, Chapter 10: Transfers, available at <https://www.nyc.gov/site/nycha/residents/acop/chapter-10.page>.

⁶³ Based on the examples laid out in the GAO report, that is, “...physical hazards (such as fire damage or a gas leak), natural disasters, or a verified medical condition of a life-threatening nature.” See United States Government Accountability Office, Report to Congressional Committees, *Rental Housing, Opportunities Exist to Improve Oversight of Assistance to Survivors of Domestic Violence or Sexual Assault*, 13, July 2024, available at <https://www.gao.gov/assets/gao-24-106481.pdf>

⁶⁴ New York City Housing Authority, Applications and Tenancy Administration Department - CY 2023 Annual Report, available at https://drive.google.com/drive/folders/1pQ3B3D9hc9gyfAwWV8_8TLexJaaGP8ba.

⁶⁵ *Id.*

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- ⁶⁶ New York City Housing Authority, Admissions and Continued Occupancy Policy, Chapters 10: Transfers, available at <https://www.nyc.gov/site/nycha/residents/acop/chapter-10.page>
- ⁶⁷ *Id.* See also New York City Housing Authority, Admissions and Continued Occupancy Policy, Chapters 4: Transfers, available at https://www.nyc.gov/site/nycha/residents/acop/chapter-4.page#Waiting_List_Management.
- ⁶⁸ 24 CFR § 5.2005(e)(6).
- ⁶⁹ United States Government Accountability Office, Report to Congressional Committees, *Rental Housing, Opportunities Exist to Improve Oversight of Assistance to Survivors of Domestic Violence or Sexual Assault*, 33, July 2024, available at <https://www.gao.gov/assets/gao-24-106481.pdf>
- ⁷⁰ New York City Housing Authority, Admissions and Continued Occupancy Policy, Chapter 10: Transfers, available at <https://www.nyc.gov/site/nycha/residents/acop/chapter-10.page>
- ⁷¹ See NYCHA’s Fiscal Year 2024 Preliminary Budget Hearing, available at, https://councilnyc.viebit.com/vod/?s=true&v=NYCC-PV-CH-COM_230313-144047.mp4.
- ⁷² New York City Housing Authority, Mayor’s Management Report, Goal 1c, available at <https://www.nyc.gov/assets/operations/downloads/pdf/mmr2024/nycha.pdf>;
- ⁷³ New York City Housing Authority, Applications and Tenancy Administration Department - CY 2021 Annual Report, available at https://drive.google.com/drive/folders/1pQ3B3D9hc9gyfAwWV8_8TLexJaaGP8ba.
- ⁷⁴ New York City Housing Authority, Apartment Turnover Staff Vacancy Data, 2018-2023, available at https://drive.google.com/drive/folders/1pQ3B3D9hc9gyfAwWV8_8TLexJaaGP8ba.
- ⁷⁵ Greg B. Smith, *NYCHA Has 5,000 Empty Apartments After Bureaucratic Bungle, Monitor Finds*, February 21, 2024, available at <https://www.thecity.nyc/2024/02/21/nycha-5000-empty-apartments/>.
- ⁷⁶ Bart M. Schwartz, Office of the Federal Monitor, *NYCHA Monitor Letter Final Report 3-19-2024*, available at <https://www.documentcloud.org/documents/24487647-nychamonitorletterfinal-report-3-19-2024>; Neil M. Barofsky and Matthew D. Cipolla, Jenner & Block LLP, *Monitors’ Report, August 21, 2024*, available at <https://static1.squarespace.com/static/65ce4d018b46ba0076431f63/t/66db0d872baeea5cdf62751d/1725631885065/NYCHA+Monitorship+Report+%289.6.24%29+%28FINAL%29.pdf>.
- ⁷⁷ Sara Ruberg, *Abused in Public Housing, Victims Often Face a Long Wait to Move*, The New York Times, September 18, 2024, available at <https://www.nytimes.com/2024/09/18/us/domestic-violence-victims-affordable-housing.html?searchResultPosition=1>.
- ⁷⁸ New York City Housing Authority, Housing Choice Voucher Program Administrative Plan, page 12, available at <https://www.nyc.gov/assets/nycha/downloads/pdf/hcpvadministrative.pdf>.
- ⁷⁹ For more information about NYCHA’s Permanent Affordability Commitment Together (“PACT”) program, visit <https://www.nyc.gov/site/nycha/about/pact.page>.
- ⁸⁰ For more information about the Public Housing Preservation Trust, visit <https://www.preservationtrust.org/>.