



April 29, 2025

NYS Office of Temporary and Disability Assistance
HEAP Bureau
40 North Pearl Street, [REDACTED]
Albany, New York 12243
By Email: [REDACTED]

Re: New York City Comments on the development of the 2025-2026 New York State Home Energy Assistance Program (HEAP) Plan

Dear HEAP Bureau:

In response to the Notice of Public Comment Period, the New York City Department of Social Services/Human Resources Administration (“HRA”), the NYC Department of Health and Mental Hygiene (“DOHMH”), NYC Emergency Management, and the NYC Mayor’s Office of Climate & Environmental Justice (“MOCEJ”) (collectively the “City”) are pleased to submit comments and recommendations on the development of the New York State Plan for the 2025-2026 New York State Home Energy Assistance Program (“HEAP”).

First and foremost, the HEAP program is critical to protecting vulnerable New Yorkers. The program is facing significant challenges ahead. Recent staffing cuts at the federal Department of Health and Human Services (HHS), and potential cuts to the program budget at large, underscore the importance of State support, and the critical role of the Office of Temporary Disability Assistance (“OTDA”) in keeping New Yorkers safe in their homes through programs like HEAP. While this response is focused on program improvements and program delivery, the program is foundational to the health and safety of New Yorkers. We are concerned that the announced staffing cuts will impede HHS’s ability to administer the program as we approach cooling season – when air conditioning is critically important for the health and safety of many low-income New Yorkers.

Energy cost burden is a significant challenge in New York City. As of the most recent available data from 2019, approximately 480,000 NYC residents were paying over 6% of their income toward their energy bills, above the State target for energy affordability. The financial impacts of the COVID-19 pandemic have only exacerbated these challenges, expanding the population struggling with unmanageable energy costs. In addition, the major utility companies serving New York City have proposed rate increases of up to 13% for all residents over the next couple of years. Therefore, the City is in support of raising the benefits amounts for eligible residents who are affected by the high cost of energy. As the next plan is finalized, we urge OTDA to maintain its efforts that have expanded eligibility and to expand further the supports provided to New Yorkers at greatest risk of negative health impacts from unsafe living conditions because of unaffordable residential energy.

The City appreciates the steps OTDA has taken to expand the low-income Home Energy Assistance Program (“LIHEAP”) in recent years, including the shift to open Cooling Assistance application in April instead of May. This continues to be important, as we experienced a particularly early and intense heat wave in June 2024. Also, the Regular and Emergency applications were extended, increasing the opportunity for all eligible New Yorkers to take advantage of these benefits.

The City also appreciates the additional funding that the governor provided last year for Cooling Assistance. Even with the supplemental funds, the need for air conditioners continues to outpace the resources available. The City emphasizes the need for dedicated state sources of funding for the Cooling Assistance Component (“CAC”) Program and other HEAP benefits, paired with further modifications both to meet the growing summer energy needs from increasing temperatures due to climate change and to continue supporting low-income New Yorkers throughout the winter.

In NYC and NYS, extreme heat is the deadliest form of extreme weather and temperatures continue to increase. In NYC alone, more than 500 residents die each year due to heat exposure both on extreme heat and non-extreme hot days (2024 NYC Heat-Related Mortality Report, DOHMH). Since 2020, as a result of expanded eligibility and targeted outreach, the number of NYC residents who received Cooling Assistance has increased. In 2024, NYC reached its highest number of CAC applicants in more than 6 years (21,225) with 13,138 applicants successfully receiving a cooling benefit. Again in 2024, as in 2023, the CAC program was forced to stop accepting applications in July due to the exhaustion of funds. We share the recommendations below (by section number in the 2024-2025 HEAP Plan) to support both advocacy for more resources and more intentional allocation across seasons to prepare for our changing climate.

One item of major importance is ensuring that the crisis assistance benefit is available to clients who are facing a heating emergency. The crisis assistance benefit is a lifeline for clients at risk of harm when their heat source has been exhausted or disconnected given cold temperatures and surging energy prices as the result of inflation. While maintaining this critical wintertime support, HEAP must also expand to extend the same lifeline New Yorkers in the summer heat.

Section 1 – Program Components

- Provide a larger HEAP benefit to address large utility bills.

Rationale: Since the closing of the Regular Arrears Supplement (“RAS”) program, HEAP has seen many clients with excessive utility bills. These include clients who did not know of RAS and did not have the opportunity to apply for it. A larger crisis benefit would provide necessary assistance for these clients.

Section 2 – Heating Assistance

- §2.7 – Recommend increasing the maximum base Heating Benefit from \$900 per household to \$1,100 per household annually.

Rationale: The previous HEAP Plan increased the maximum heating benefit from \$751 to

\$976. In addition to inflation and increased heating cost, clients must apply for emergency benefits because the regular heating benefit generally does not cover the amount of arrears. The annual inflation rate for the United States is **2.4%** for the 12 months ended March 2025 after rising 3.5% for the previous year ending in March 2024, according to U.S. Labor Department data published April 10, 2025. Recommend increasing the base heating benefit by \$200, to a new requested base benefit of \$1,100 annually.

Section 3 – Cooling Assistance

- § 3.2 –*Eliminate the medical documentation requirement for CAC, subject to additional federal or state funding for this component.*

Rationale: OTDA waived these requirements beginning in Summer 2020, which has helped to streamline applications for households in need of the benefit, and reduced strain on an already-burdened medical system. This documentation requirement presents a significant and unnecessary barrier to eligible New Yorkers, as well as creating nonessential paperwork for over-burdened healthcare providers. Permanently waiving this requirement is in line with ongoing efforts to streamline application processes and consistent with LIHEAP winter heating benefits, which currently require no medical documentation for eligibility.

- § 3.5 *Include an additional \$300 benefit during the summer months to households with utility accounts-subject to additional federal or state funding, in the form of an autopayment to the energy service provider for utility assistance.*

Rationale: In NYC alone, more than 500 residents die each year due to heat exposure both on extreme heat and non-extreme hot days (2024 NYC Heat-Related Mortality Report, DOHMH). In NYC and NYS, hospital admissions for renal, respiratory, mental health, and cardiovascular conditions also increase during hot weather. Many vulnerable families and individuals pay more than the state’s target of 6% of their incomes on energy bills, and many do not run their cooling system because of increased energy costs. Many New Yorkers (28% of adults) struggle with energy insecurity, which is the inability to meet household energy needs. Energy insecurity includes economic hardship, like not being able to pay a bill, physical hardships related to conditions of the building, and coping behaviors used to deal with insufficient energy, like not using air conditioning when it is too hot. A 2022 survey of 1,950 people conducted by the NYC Health Department and weighted to be representative of all NYC adults found that nearly a quarter (21%) of New Yorkers face economic hardship – being unable to pay their electric or gas bill in full, missing a payment, or being late paying because they could not afford it in the previous year (among those who paid those bills directly). Difficulty paying bills was even higher among Black (34%) and Hispanic (27%) residents, as well as households with children (31%). More than a third (39%) of all New Yorkers said they cut back on energy use to cope with concerns about the bill. Of those cutting down on energy use because of worries about the bill, nearly two-thirds said it affected their stress levels or mood (64%), and more than one third said it affected decisions about food purchases (38%). Many said it affected their health conditions (18%), and decisions about medicine purchases (13%). These are not tradeoffs New Yorkers should have to make. Self-reported participation in HEAP for winter and summer assistance in the past year was low (8%) in NYC relative to the needs.

Section 4 – Crisis Assistance

- § 4.7 — *Crisis assistance eligibility criteria should be amended as follows:*
“In addition to verified crisis emergency, as described in Sections 4.2 and 4.3, meeting income, residence, citizenship, or eligible immigration status, living situation, responsibility for heating costs, and providing a valid social security number for at least one household member[s], applicants for crisis assistance must have exhausted their Regular benefit, and meet the asset test in order to be eligible.”

Rationale: Although OTDA accepted in the current HEAP plan one of HRA’s recommendations to add “citizenship” to the crisis assistance eligibility criteria, it did not adopt the other recommendations set forth above. Adding eligible immigration status would conform with current OTDA policy. ([Home Energy Assistance Program \(HEAP\) Manual - 2020-2021 \(ny.gov\)](#) at 44) Federal policy does not require that all household members have a social security number. ([LIHEAP IM HHS Guidance on the Use of Social Security Numbers \(SSNs\) and Citizenship Status Verification | The Administration for Children and Families.](#)) The federal Information Guidance states “***What if the applicant or household members do not have SSNs? A6: This depends on what the grantee’s policy is regarding SSNs. If the grantee’s law or policies require SSNs, then individuals that do not have SSNs may be considered ineligible by the grantee. It is strongly encouraged, however, that grantees (a) assist such individuals with obtaining SSNs and the necessary documentation; and (b) avoid delaying or denying LIHEAP assistance to those household members pending such information if the individuals are otherwise eligible to receive LIHEAP benefits.***”

In addition, a conforming amendment should be made to Section 17.2 of the current plan which requires the collection of the social security number without the actual cards from all adults in the household and all household members.

- § 4.7 – *Increase the resource threshold for Crisis Assistance from \$2,500 (or \$3,750 for households with a vulnerable member, a member aged 60+, or young children under age 6) to \$3,000 and \$4,000 respectively, and amending as follows:*

“All applicants and household members for crisis assistance are asset (resource) tested. Applicants for the Emergency benefit component must not have more than \$3750 (or \$4000 for households that includes a vulnerable member, elderly age 60 years or older, or young children under age 6) in available liquid resources in order to be eligible. Only available liquid resources are counted. Declared liquid resources can be verified using the following: checking account statements, savings statements or bankbooks, stock certificates, bank or dividend statements, savings bonds, and statements from the institution where funds are deposited or managed.”

Rationale: This would model for crisis assistance resource limits relatively comparable to the temporary assistance resource limits which went into effect on October 1, 2022, of \$2500 and \$3750 for households with 60+ member.

- § 4.10 – *Amend plan to indicate that clients may apply for HERR by phone or electronic submission (e.g.: online and fax, including electronic-fax).*

Rationale: This would make it easier for clients to apply. This is already available for other HEAP benefits and there is available support to do so for electronic submission/phone for HERR applications.

- § 4.11 – *Amend plan to indicate that clients may apply for HERR by electronic submission (e.g.: online and fax, including electronic-fax).*

Rationale: This would make it easier for clients to apply. See immediately preceding rationale.

- § 4.12 - Increase maximum Heating Crisis Benefit from \$900 to \$1800 to adjust for inflation and increased costs.

Rationale: OTDA increased in the current plan the maximum Heating Crisis Benefit from \$675 to \$900. Providing a one-time payment larger payment would allow for emergencies to be thwarted and provide a longer-term continuance of service.

Section 5 – Weatherization Assistance

- § 5.11 *Recommend including heat pumps (including but not limited to: air source heat pumps, ground source heat pumps, and water source heat pumps) to the list of weatherization measures, and an associated increased benefit for heat pump installation*

Rationale: Air source heat pumps can provide vulnerable New Yorkers reliable and efficient heating and cooling while being more energy efficient and sustainable than traditional heating and cooling systems. Compared to AC units, heat pumps will have lower household energy usage in the summer months, better shielding New Yorkers from volatile electricity prices and dangerous indoor temperatures. Heat pumps will also allow New Yorkers to switch from harmful fossil fuels to a clean source of energy for heating, protecting them from the many dangerous health conditions associated with onsite fossil fuel combustion. While heat pump installation may lower cooling costs, it could result in higher electricity costs in the winter. For this reason, an increased heating utility benefit could be warranted.

We would like to thank OTDA for its cooperation and assistance in administering the federal LIHEAP to New York City’s low-income customers and appreciate the opportunity to provide our comments on the plan. We look forward to your consideration of these comments and requests.

Please contact [REDACTED], at [REDACTED] if you have any questions. Thank you for your consideration of our comments.

Sincerely,



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