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Committee on Human Services
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Human Services Public Oversight Roundtable:
The Department of Human Services' Rapid Re-Housing Program

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Thank you for holding this Roundtable, Councilmember Nadeau. Good afternoon, members of the Committee on Human Services. My name is Judith Sandalow. I am the Executive Director of Children's Law Center¹ and a resident of the District living in Ward 1. I am testifying today on behalf of Children's Law Center, which fights so every DC child can grow up with a loving family, good health and a quality education. With 100 staff and hundreds of pro bono lawyers, Children's Law Center reaches 1 out of every 9 children in DC's poorest neighborhoods – more than 5,000 children and families each year. We have represented far too many children and families experiencing homelessness, and we have worked with many clients who have received a Rapid Re-Housing subsidy.

Our experience with Rapid Re-Housing in the District is that its structure and its implementation often result in families living in substandard housing that puts their children's health at risk and that leaves them without a stable housing option at the end of the program.

This Committee has called for testimony regarding DC's version of Rapid Re-Housing, which DC has adapted from a national model intended to help a targeted group of individuals and families transition from homelessness to stable housing. I would be remiss, however, if I didn't first acknowledge that homelessness in DC is a direct result

of our city's affordable housing crisis, and that lack of affordable housing is a crisis of our own making. Historically, federal and local laws and policies have helped white residents purchase housing and accumulate wealth while actively preventing African American residents from living in certain neighborhoods, securing loans and purchasing homes. Today's zoning and tax laws continue to provide incentives and permission for certain types of housing while making it more difficult to build others. We laud recent investments in affordable housing, including through the Housing Protection Trust Fund. However, these investments barely make a dent in the need that has been created by the virtual disappearance of affordable, unsubsidized apartments.² Additionally, our investments have not been allocated proportionately to the people who need it the most. Although 77 percent of DC renters in need of affordable homes are 'extremely low-income,' only 39 percent of investment in new affordable housing between 2010 and 2016 has been available to that group.³ In short, our laws, policy decisions and investments have left thousands of DC's poorest children and families without access to stable, permanent, and affordable housing.⁴

The harmful impact of housing instability on children's emotional and physical health is well known, as is the great long-term financial cost of these public health concerns. Frequent moves are correlated with poor social development for children of all ages.⁵ Children who experience housing instability are more likely to regularly miss school,

more likely to do worse than their peers in terms of educational outcomes and achievement, and less likely to graduate from high school.^{6, 7, 8} Housing instability also makes it harder for children with chronic medical conditions to receive the regular care they need, leading to costly emergency care and long-term health crises.⁹ Parenting in the face of imminent eviction can cause toxic stress, which, in turn can have cognitive and emotional repercussions for both parents and children.¹⁰ Toxic stress in early childhood can actually disrupt the brain's physical development, which can harm the development of organ systems and the body's regulatory functions.¹¹ For young children, the lifelong costs of toxic stress are enormous, and we know that investment in interventions to mitigate the effects of that stress can generate large and enduring economic returns.¹²

There are so many reasons why we need to invest in affordable housing. Sadly, the proof of our failure to step up to this great challenge is in the data. Over time, DC households have been forced to spend greater and greater portions of their income on rent,¹³ leaving fewer funds for other basic needs. Since 2008, individual homelessness has increased by 24%, and family homelessness has doubled.¹⁴

We urge the city to treat homelessness and affordable housing as one issue. Silos within the Council and the executive branch prevent important collaborations for addressing

homelessness through affordable housing solutions. Within the Council, this Committee on Human Services should work closely with the Committee on Housing and Neighborhood Revitalization in oversight, and to develop legislative strategies and solutions to this crisis. We also implore the Council to work with the Mayor to develop a comprehensive plan to ensure that all DC residents can secure affordable housing.¹⁵

Rapid Re-Housing: A Program Not Used to Fidelity in DC

My colleague, Diana Sisson, will discuss in more detail the many ways in which the Rapid Re-Housing program is being poorly implemented. But to summarize, we regularly meet:

- Families who, rather than being *rapidly* re-housed, spend months in shelter before finding a landlord who will accept their voucher.
- Families who receive little to no support in that housing search.¹⁶
- Families who sign a lease for an apartment only to realize the conditions in the home are squalid and hazardous to their children's health.
- Families who continue to lack that vital sense of stability because they are told from the outset that their subsidy will only last three months to a maximum of one year.
- Families who receive little to no supportive assistance from their case manager, despite program requirements.

- Families who, at the end of their subsidy, are suddenly left to pay a rent they could never have afforded to pay.
- Families who are evicted and, as a result, will have a much more difficult time renting in the future if and when they do become more stable.

There are problems with the policy decisions being made as well. As you know, Rapid Re-Housing was developed as a targeted, brief intervention for individuals and families who have temporarily lost a job, and who need fewer supportive services to become permanently housed.^{17, 18} Under the national model, Rapid Re-Housing is intended to be a small component of a spectrum of interventions, not a tool used for all families regardless of their circumstances.

DC does not use Rapid Re-Housing in the targeted, narrow way in which it was designed. Here, Rapid Re-Housing is used as the only Housing First tool for families—it is an intervention offered to the vast majority of families in shelter under the theory that they need to be stabilized to determine their housing needs. This theory is premised on an assumption that families cannot be stabilized in shelter.¹⁹ While we agree that stabilizing families is a necessary step in determining their long-term needs, we disagree that Rapid Re-Housing as it currently exists is the right way to do that.

In April of this year, 1,367 families with more than 4,000 children were receiving a Rapid Re-Housing subsidy.²⁰ This includes many families in which the parents have no job history, and single-parent families in which the parent has only ever held a minimum-wage job. It is not realistic to expect these families to be able to afford a market rate apartment in DC after just one year. The math simply does not work.²¹ The only logical endpoint for many of these families is to leave their housing through eviction or in anticipation of eviction.

There is no comprehensive data on what happens to families who leave rapid re-housing. The District focuses on how many families re-enter the shelter system. But this creates a false dichotomy between homelessness and secure housing. Our experience is that many families double up in overcrowded or unsafe situations, sometimes in DC and sometimes in neighboring communities. The negative impact of this housing instability is addressed earlier in my testimony.

The Director of DC's Department of Human Services has said that Rapid Re-Housing is not designed to be a long-term solution for homeless families.²² We agree. It is also not an effective short-term solution for many of the homeless families for whom it is used. Solving the problem of homelessness requires a nuanced spectrum of interventions. Rather than our current one-size-fits-all approach, we urge the District to determine

families' long-term needs much earlier in the process: if we know a family will eventually require a targeted affordable housing or permanent supportive housing voucher, we should be providing those vouchers immediately rather than several months into a rapid rehousing subsidy. This may require doing more to stabilize families in shelter. And, just as Housing First models tailor the support to individual needs, the duration of a Rapid Re-Housing subsidy should be tailored to each individual family's needs, even if that would mean a subsidy which lasts longer than 12 months. Finally, the Council and DHS should ensure providers are diligently screening *all* families for other programs which may be a better fit, including transitional housing, targeted affordable housing, and permanent supportive housing.

ISSUES AND PROPOSED SOLUTIONS

In light of the fact that Rapid Re-Housing is inappropriate and even harmful for many of the families who receive the subsidy, we recommend that the Council take action to ensure DC scales back its dependence on this program. But we know this sort of systems change takes time. To protect families in the meantime, this Committee and the Administration should make immediate changes to DC's version of Rapid Re-Housing. Rapid Re-Housing has two core components: subsidy and case management.²³ As implemented in DC, each of these components are deeply flawed.

Subsidy-Related Concerns and Proposed Solutions

With respect to the subsidy, we are specifically concerned about:

- The difficulty families have in finding quality landlords who accept the subsidy,²⁴
- inflexibility in size and uses of the subsidy, and
- that the subsidy is time-limited.

Presently, one big challenge is that families have a very hard time finding landlords who will accept the Rapid Re-Housing subsidy. As a result, the options our families are left with tend to be unsafe and unhealthy—shameful circumstances which Diana will describe in detail. If our intent is to stabilize families, DC should ensure people in Rapid Re-Housing are living in healthy and safe homes. We should find ways to incentivize good, honest landlords to rent to our families. A larger subsidy, and the recently created Landlord Partnership Fund may be solutions.²⁵ We could also accomplish this by more careful screening for who enters the program, more individualization of the program design to the family's needs, and a guarantee of high-quality case management for everyone in the program.

Second, families should have more flexibility about how they use their Rapid Re-Housing subsidy. We should allow families to explore housing solutions that might

work long term for them, such as renting rooms from a family member or permitting two families to live together in a larger unit. We should be open to anything which will increase the likelihood of successful exit from the program.

Finally, as with TANF, we should eliminate arbitrary time limits that fail to account for individual circumstances. For that reason, we must end the Rapid Re-Housing cliff. To do so is penny-wise and pound-foolish. Not having to worry constantly about the threat of eviction and homelessness will have the effect of reducing toxic stress in families and will benefit children's well-being. Stability and a sense of security will result in more successful outcomes for individual families.

Case Management-Related Concerns and Solutions

We regularly see poor quality case management, high turnover rates for case workers, and long delays in re-assigning case workers. All of this leaves families without the support and tools they need to succeed. DHS describes case management as an essential part of the program. Indeed, families can be terminated for failing to engage in case management.²⁶ But there is no reciprocal obligation. When DHS fails to ensure a client receives even minimal case management over the course of their subsidy, it does not prevent the hard stop, twelve month cut-off for the subsidy.

While we know that a few providers provide higher quality case management, too many of our clients have very low-quality case management, or no case management at all. Our clients may be assigned to three or four case workers over the course of a year in Rapid Re-Housing. In these instances, poor record-keeping means they may have to retell their painful story and complete the same screenings several times over, often with no result or follow-through. Our clients, and indeed our attorneys, report significant challenges in even having caseworkers return their phone calls. And when they do, our attorneys have spoken with case managers who are not aware of how to screen for or make referrals to long term housing resources.

In cases where clients are facing abysmal housing conditions, caseworkers should be a dependable resource for ensuring the landlord is following the law and keeping the home or apartment in habitable condition. When the heat stops working in the winter, or infestations of rodents and mold are causing a child visits to the emergency room for asthma flare-ups, clients should be able to depend on their case manager for support and help. In our experience, this does not happen.

For Rapid Re-Housing to be successful, participants need a case manager who is actively involved from the moment the family receives the voucher—a case manager who helps them find a safe and healthy apartment which the family has some chance of

affording at the end of a year. During the family's time in the program, the case manager should help the family find stability through career readiness and connection to other community-based supports. Finally, the case manager should be doing everything possible to ensure the family will be permanently housed at the end of the program.

However, DHS has not been successful at holding providers accountable. In fact, you will hear from Diana that some of the worst examples of case management we have seen have been from DHS' own Office of Work Opportunities. We ask that the Council, through oversight, hold DHS accountable for ensuring change in current case management practices. To that end, we would be very happy to provide suggestions for oversight questions. We also encourage the Council to provide the necessary funding to collect critically-needed, detailed data about Rapid Re-Housing.

Oversight and accountability may slowly help fix the system, but they are not an adequate or timely enough response for individual families. In order to address the serious systemic and implementation issues in Rapid Re-Housing while also protecting the families who are currently in it, we are asking for a legislative fix to limit the Rapid Re-Housing cliff by giving clients the right to appeal in their subsidy termination in certain circumstances, including when they have not received case management, when

the unit does not meet certain affordability standards, and when the housing conditions have significantly impacted their ability to benefit from Rapid Re-Housing.

Conclusion

Thank you for the opportunity to testify today. We look forward to working with the Committee and the Administration as this process moves forward.

¹ Children’s Law Center fights so every child in DC can grow up with a loving family, good health, and a quality education. Judge, pediatricians, and families turn to us to be the voice for children who are abused or neglected, who aren’t learning in school, or who have health problems that can’t be solved by medicine alone. With 100 staff and hundreds of pro bono lawyers, we reach 1 out of every 9 children in DC’s poorest neighborhoods--more than 5,000 children and families each year. And, we multiply this impact by advocating for city-wide solutions that benefit all children.

² *A Broken Foundation: Affordable Housing Crisis Threatens DC’s Lowest-Income Residents*, at p. 1. Claire Zippel, DC Fiscal Policy Institute (DCFPI). Dec. 8, 2016. <https://www.dcfpi.org/wp-content/uploads/2016/12/DCFPI-Broken-Foundation-Housing-Report-12-8-16.pdf>.

³ 880 of 4110 new affordable rental units from 2010 to 2016 were for extremely low-income renters. The rest were for higher income groups. Of 4700 newly preserved units in that time, only 1770 were for extremely low-income renters. P2: All in all, although 77 percent of the DC renters in need of affordable homes are extremely low-income, only 39 percent of publicly-funded apartments from 2010-2016 were affordable to this group. *Id.* at 10.

⁴ Claire Zippel, DCFPI. *A Broken Foundation: Affordable Housing Crisis Threatens DC’s Lowest-Income Residents*. Dec. 8, 2016. <https://www.dcfpi.org/wp-content/uploads/2016/12/DCFPI-Broken-Foundation-Housing-Report-12-8-16.pdf>.

⁵ *The Negative Effects of Instability on Child Development: A research Synthesis*, p. 6. Heather Sandstrom and Sandra Huerta, Urban Institute. Sept. 2013. https://www.urban.org/research/publication/negative-effects-instability-child-development-research-synthesis/view/full_report.

⁶ Rebecca Cohen and Keith Wardrip, Center for Housing Policy. *Should I Stay or Should I Go? Exploring the Effects of Housing Instability and Mobility on Children*. Feb. 2011. http://mcstudy.norc.org/publications/files/CohenandWardrip_2009.pdf

⁷ *Id.* at 4-5.

⁸ *Id.* at 7.

⁹ Reid KS, Vittinghoff E, Kushel MB. *Association between the level of housing instability, economic standing and health care access: a meta-regression*. Nov. 2008

¹⁰ Toxic stress in early childhood can actually disrupt the brain’s physical development, which can adversely affect the concurrent development of other organ systems and regulatory functions. *See* Jack P.

Shonkoff, MD, Andrew S. Garner, MD, PhD. *The Lifelong Effects of Early Childhood Adversity and Toxic Stress*. Jan., 2012. Am. Academy of Pediatrics, Volume 129, Number 1, at e243.

¹¹ *Id.*

¹² *Id.*

¹³ *A Broken Foundation*, at 3.

¹⁴ In 2008, 2013, and 2017 respectively the number of homeless families in Washington DC increased from 587 (1836 total people) to 983 (3169 total people) to 1166 (3890 total people). In 2008, 2013, and 2017 respectively, the number of homeless individuals increased from 6044 to 6865 to 7473. Metropolitan Washington Council of Governments, *A Regional Portrait of Homelessness: The 2010 Count of Homeless Persons in Metropolitan Washington*, p. 6; *Results and Analysis from the 2013 Point-in-Time Count of Homeless Persons in the Metropolitan Washington Region*, p. 7; *Homelessness in Metropolitan Washington: Results and Analysis from the 2017 Point-in-Time Count of Persons Experiencing Homelessness*, p. 13.

¹⁵ Of course, this will require the cooperation of many agencies, such as DCHA, DHCD, DHS, OTA, and others. And while we appreciate the work of the Interagency Council on Homelessness on the Homeward DC Plan, that plan does not provide comprehensive ideas for addressing the affordable housing crisis. See DC Interagency Council on Homelessness, *Homeward DC 2015-2020*.

[https://ich.dc.gov/sites/default/files/dc/sites/ich/page_content/attachments/ICH-StratPlan2.11 web.pdf](https://ich.dc.gov/sites/default/files/dc/sites/ich/page_content/attachments/ICH-StratPlan2.11%20web.pdf).

¹⁶ Indeed, we have had to appeal terminations for time limits which began tolling when the family was approved for the subsidy instead of when the family was actually housed.

¹⁷ According to the US Department of Housing and Urban Development (“HUD”) and the US Interagency Council on Homelessness, Rapid Re-Housing funds and services are intended for “households who have barriers to housing, but who are likely to sustain housing after the subsidy ends.” Department of Housing and Urban Development. See *Notice of Allocations, Application Procedures, and Requirements for Homelessness Prevention and Rapid Re-Housing Program Grantees under the American Recovery and Reinvestment Act of 2009*, at 26. https://www.hudexchange.info/resources/documents/HPRP_Notice_3-19-09.pdf

¹⁸ “Program participants who require longer-term housing assistance and services should be directed to programs that can provide the requisite services and financial assistance.” *Id.*

¹⁹ Jacob Fenston, *Does D.C.’s Rapid Re-Housing Program Live Up to Its Promise?* NPR. Feb 20, 2015. https://wamu.org/story/15/02/20/does_rapid_re_housing_program_live_up_to_its_promise/.

²⁰ Paul Duggan, *Report faults D.C.’s assessment of ‘rapid rehousing’ program*, Washington Post. May 6, 2017.

²¹ “Kate Coventry, a policy analyst with the D.C. Fiscal Policy Institute, says to afford market-rate rent, a single mom making minimum wage would have to work three full-time jobs, or more than 120 hours a week.” *Does D.C.’s Rapid Re-Housing Program Live Up to its Promise?*

²² *Id.*

²³ See United States Interagency Council on Homelessness, “Rapid Re-Housing” updated on Dec. 10, 2015, at <https://www.usich.gov/solutions/housing/rapid-re-housing>.

²⁴ Under DC’s Human Rights Act, a landlord’s refusal to accept payment through a subsidy or voucher is discrimination on the basis of Source of Income, and is illegal. But this is a real and very common challenge which our clients face.

²⁵ See *Mayor Bowser Announces Landlord Partnership Fund*, Oct. 6, 2017.

<https://mayor.dc.gov/release/mayor-bowser-announces-landlord-partnership-fund>.

²⁶ See 29 DCMR § 7803.5(f). See also 29 DCMR § 7805.12, stating that a participant cannot receive an extension to the program without having “demonstrated activity in achieving the goals identified in their individualized plan or IRP.”