

501 3rd Street, NW · 8th Floor Washington, DC 20001 T 202.467.4900 · F 202.467.4949 www.childrenslawcenter.org

Testimony Before the District of Columbia Council Committee on Housing April 5, 2024

Public Hearing: Budget Oversight Hearing Department of Human Services

> Makenna Osborn Policy Attorney Children's Law Center

Introduction

Good morning, Chairperson White, and members of the Committee. My name is Makenna Osborn. I am a Policy Attorney at Children's Law Center and a resident of the District. Children's Law Center believes every child should grow up with a strong foundation of family, health and education and live in a world free from poverty, trauma, racism and other forms of oppression. Our more than 100 staff – together with DC children and families, community partners and pro bono attorneys – use the law to solve children's urgent problems today and improve the systems that will affect their lives tomorrow. Since our founding in 1996, we have reached more than 50,000 children and families directly and multiplied our impact by advocating for city-wide solutions that benefit hundreds of thousands more.

Thank you for the opportunity to testify regarding the Mayor's proposed FY25 budget for the Department of Human Services (DHS). Housing security – having a safe, stable, and affordable place to call home – has a profound impact on a child's health, development, and ability to learn. Childhood housing insecurity is linked to adverse physical, mental, and behavioral health conditions that can pose lifelong challenges. In a year where the District faces difficult choices about how to allocate our resources, adequately funding the DHS programs that help families at risk of homelessness attain and maintain stable housing is one of the most important investments the District can make to support our community. Therefore, we were deeply disappointed to see that

the Mayor's proposed FY25 budget includes cuts to the funding for these important services. We want to thank you, Chairperson White, for recognizing the harm these reductions will cause to District families and for your commitment to prioritizing investments in DHS in the FY25 budget.⁴

Many of Children's Law Center's clients utilize DHS's homelessness prevention programs to keep their family stably housed, including Targeted Affordable Housing (TAH) and Permanent Supportive Housing (PSH) vouchers and the Family Re-Housing Stabilization Program (FRSP, commonly referred to as Rapid Re-Housing). My testimony today will identify the level of funding the Council should ensure is included for these programs in the DHS budget to meet the needs of District families in FY25 and explain why the Council should prioritize investments in long-term housing vouchers like TAH and PSH over the time-limited Rapid Re-Housing Program that is more costly and less effective.

The Council Should Continue Investing in Local Long-Term Housing Vouchers to Keep Families Stably Housed

Long-term rental subsidies, like those provided by the District's Targeted Affordable Housing (TAH) and Permanent Supportive Housing (PSH)⁵ voucher programs, are an effective, evidence-based tool for alleviating housing insecurity and preventing homelessness.⁶ TAH and PSH vouchers are vital resources for the many families who cannot afford stable housing in DC's costly rental market due to a disability or other factor limiting household earning potential and/or the growing gap between

rental prices and wages.⁷ Unfortunately, the Mayor's proposed FY25 budget does not include any funding for new TAH or PSH vouchers for families.⁸ Households with children make up a disproportionate number of the 12% of District residents currently experiencing housing insecurity.⁹ If the Council does not ensure that there are new vouchers available to these families in the FY25 budget, hundreds – if not thousands – of DC children and families could become housing insecure or homeless.

Chairperson White and the Council have led historic investments in locally funded housing vouchers in recent years – making a positive difference for families¹⁰ – and Children's Law Center hopes you will continue supporting permanent housing solutions in FY25.¹¹ Along with our partners in the Fair Budget Coalition, we estimate that the number of vouchers that will be needed by families in shelter and Rapid Re-Housing in FY25, is 2,326 TAH vouchers and 580 PSH vouchers.¹² To meet this level of need, the Council would need to maintain the recurring funding for existing vouchers and allocate an additional \$70.75 million to DCHA for new TAH vouchers for families and \$22.80 million to DHS for new PSH vouchers for families.¹³

Both the Mayor and Council have raised concerns about funding new vouchers in while there is a backlog of local vouchers funded in previous years yet to be used – a prudent consideration while the District is facing drastic budget cuts. However, DHS has made notable improvements in its voucher processes over the past year such that all of the TAH and PSH vouchers funded in FY22 and over half of the vouchers funded in FY23

have been allocated to eligible families. ¹⁴ DHS expects to match all of the remaining FY23-funded vouchers to families by the end of June 2024. ¹⁵ If DHS meets this goal, the District is on track to run out of TAH and PSH vouchers to connect to families who are newly housing insecure or homeless in July and October 2024 respectively. ¹⁶

Children's Law Center would like to see the Council fund enough long-term vouchers to connect each eligible family that DHS anticipates will be terminated from Rapid Re-Housing or enter shelter in FY25 with long-term housing stability. However, given the budget constraints the District government is facing this year, we acknowledge that the Council may not be able to meet the actual level of need amongst DC families. At a minimum, the Council should fund enough new TAH and PSH vouchers for DHS to maintain its current matching pace through FY25. In FY23, DHS matched an average of 11 TAH and 25 PSH vouchers to new families per month meaning the Council should aim to fund at least 132 new TAH and 300 new PSH vouchers in the FY25 budget. This would require allocating an estimated additional \$4.01 million to DCHA for new TAH vouchers for families, and \$11.79 million to DHS for new PSH vouchers for families.

Children's Law Center also strongly encourages the Council to ask DHS 1) why fewer families are matched to TAH vouchers each month even though more families are eligible for TAH vouchers than PSH vouchers and 2) what, if any, process changes DHS could make in FY25 to increase the number of TAH vouchers matched per month. Most families in the District experiencing or at risk of homelessness do not need intensive

supportive services to maintain housing; they are simply struggling to afford rent in an economy where housing costs have outpaced wage growth for years. ¹⁹ Recognizing this reality, the Council created TAH to be a lower barrier, lighter touch voucher to "better match families . . . experiencing homelessness with the correct amount of housing and supporting services." ²⁰ TAH vouchers are critical for the many families Children's Law Center works with who are not statutorily eligible for a PSH voucher and do not require the level of case management services attached to PSH vouchers. ²¹ TAH vouchers are also less costly for the District. ²² The Council and DHS must work together to ensure that families can be connected to the most appropriate, cost-efficient resource for them in FY25, which would likely require funding more TAH vouchers than in previous budgets.

Not being able to connect a family at risk of homelessness with stable housing through an appropriate long-term voucher can have dire and costly consequences. If the Council does not invest in any new long-term vouchers for DC families in the FY25 budget, next year more families will go through the destabilizing experience of acute housing insecurity and many could end up in the District's family shelter system, which will be more costly for the District and harmful to the future of DC children.

The Council Must Reform Rapid Re-Housing Because It is an Ineffective Program and Inefficient Use of District Funds

The Mayor's FY25 budget once again appears to prioritize investing in the Rapid Re-Housing program instead of long-term housing solutions like new TAH and PSH vouchers.²³ As we have testified many times before, Children's Law Center does not

believe the District should rely on Rapid Re-Housing as its primary tool for addressing family homelessness. ²⁴ We have years of evidence that Rapid Re-Housing is an ineffective intervention and inefficient use of District money. Most families in DC simply cannot grow their income enough in the 12-to-18-month time limit set by DHS to independently afford market rent at the end of the program. In our experience, when a family's Rapid Re-Housing subsidy ends, they fall behind on rent, are sued for eviction and soon end up facing acute housing insecurity again. Additionally, landlords in DC know that Rapid Re-Housing participants will likely not be able to afford their rent after the program, so they have little incentive to maintain habitable, code-compliant properties. As a result, the conditions in rental units that families can rent with their Rapid Re-Housing subsidy are so poor that families do not – and often cannot for the health of their family – want to stay in the unit for an extended period. ²⁵

We cannot continue investing valuable and limited District resources into a program that we know does not help families achieve stable, affordable housing and consistently gives money to some of the worst landlords in DC.²⁶ Despite years of participants, housing advocates, and the Council raising concerns about the structure and operation of Rapid Re-Housing to DHS, the agency has not taken steps to meaningfully improve outcomes for participants. Instead, DHS just released new Rapid Re-Housing regulations that entrench rather than correct the worst aspects of the program and could result in thousands of District families exiting Rapid Re-Housing with no plan for long-

term housing stability.²⁷ DC residents need the Council to legislatively reform Rapid Re-Housing to better meet their needs. We encourage the Council to pass and fund the Rapid Re-Housing Reform Amendment Act of 2023 in the FY25 budget cycle.²⁸ Without these changes, we will continue cycling families through homelessness and housing insecurity, rather than setting them up on a path to permanent housing stability.

Conclusion

It is vital that the Council does not fund DHS homelessness prevention programs by taking from other components of the District's social safety net. The Council and Executive should work together to raise revenue and build an equitable budget that maintains the District's commitments to meeting our residents' basic needs. Children's Law Center looks forward to continuing to work with DHS and this Committee to improve how we connect families experiencing housing insecurity and homelessness in the District with appropriate resources. Thank you and I welcome any questions.

¹ See Sonya Acosta, "Stable Housing is Foundational to Children's Well-Being," Center on Budget and Policy Priorities (Feb. 15 2022), available at: https://www.cbpp.org/blog/stable-housing-is-foundational-to-childrens-well-being; Megan Sandel et al., "Housing as a Healthcare Investment," Children's Health Watch (Mar. 2016), available at: https://childrenshealthwatch.org/wp-content/uploads/Housing-as-a-Health-Care-Investment.pdf.

² See Abigail Gaylord et al., *Impact of Housing Instability on Child Behavior at Age 7*, Int'l J. Child Hum. Dev. 287 (2018), *available at*: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8442946/#R8; Pete Nabozny, *A Place to Call Home*, The Children's Agenda (Aug. 2023), *available at*: https://thechildrensagenda.org/wpcontent/uploads/2023/08/Housing-Stability-FINAL.pdf; Kimberly Rollings, *Housing and Neighborhood Physical Quality: Children's Mental Health and Motivation*, 50 J. Env't Psych. 17 (2017), *available at*: https://www.sciencedirect.com/science/article/abs/pii/S027249441730004X?via%3Dihub.

³ Families that experience eviction and homelessness are more likely to use public services like shelter, the healthcare system, educational supports, and the legal system. Numerous studies have shown that investments in eviction and homelessness prevention generate larger savings across other budget areas

and benefits to communities. See William N. Evans et al., The Impact of Homelessness Prevention Programs on Homelessness, 353 Science 694 (August 12, 2016), available at: https://nlihc.org/sites/default/files/Impact-ofhomelessness-prevention.pdf (Study on temporary financial assistance to those at risk of homelessness in Chicago found average cost of assistance was \$10,300 and average estimated societal benefits was \$20,548); EY, CommonBond Communities: Social Impact Measurement of CommonBond's Eviction Prevention Activities, (Aug. 2018), available at: https://commonbond.org/wp-content/uploads/2018/08/CommonBond-Social-impact-report-Final.pdf (Study of eviction prevention programs in Minnesota, Iowa, and Wisconsin found that for every \$1 spent on eviction prevention, the states realized an average \$4 social return on investment); Stout, Cost-Benefit Analysis for Philadelphia Right to Counsel for Low Income Tenants Facing Eviction, https://www.stout.com/en/experience/cost-benefit-analysis-for-philadelphia-right-tocounsel (Study found that the City of Philadelphia would receive a benefit of over \$12 for every \$1 spend on providing legal representation to low-income tenants facing eviction). See also Dan Threet, Mackenzie Pish et al., Costs of Covid-19 Evictions, Nat'l Low Income Hous. Coal. & Univ. Ariz. James E. Rogers Coll. L. (Nov. 19, 2020), available at: https://nlihc.org/sites/default/files/costs-of-covid19-evictions.pdf. ⁴ Letter from Councilmember Robert White to Mayor Muriel Bowser (March 13, 2024), available at: https://www.robertwhiteatlarge.com/councilmember-robert-whites-2025-budget-letter-to-mayor-murielbowser/ ("Investing in DHS is not just an act of compassion but a strategic investment in our residents' resilience and the District's stability. Not putting food on the table, getting evicted, and falling behind on basic expenses can set a family back financially for years and have profound effects on their relationships, mental health, and ability to provide for themselves. [The] FY 2025 budget must prioritize filling DHS's budget gap.")

11/Housing%20Insecurity%20in%20the%20District%20of%20Columbia 0.pdf. See Solari, Claudia D., Douglas Walton, and Jill Khadduri. 2021. "How Well Do Housing Vouchers Work for Black Families Experiencing Homelessness? Evidence from the Family Options Study." The ANNALS of the American Academy of Political and Social Science, 693(1): 193-208; Gubits, Daniel, Marybeth Shinn, Michelle Wood, Stephen Bill, Samuel Dastrup, Claudia D. Solari, Scott R. Brown, Debi McInnis, Tom McCall, and Utsav Kattel. 2015. Family Options Study: 3-Year Impacts of Housing and Services Interventions for Homeless Families. Washington DC: US Department of Housing and Urban Development; Fischer, Will. October 2015. "Research Shows Housing Vouchers Reduce Hardship and Provide Platform for Long-Term Gains Among Children." Washington DC: Center on Budget and Policy Priorities; and Wood, Michelle, Jennifer Turnham, and Gregory Mills. 2008. "Housing Affordability and Family Wellbeing: Results from the Housing Voucher Evaluation." Housing Policy Debate 19 (2): 367–412.

⁵ For details on the TAH and PSH programs, see DHS, Housing Resources for Families, https://dhs.dc.gov/page/housing-resources-families.

⁶ Solari, Claudia D., et. al., *Housing Insecurity in the District of Columbia*, Urban Institute, November 2023, p. 28, *available at*: https://www.urban.org/sites/default/files/2023-

⁷ Morgan Baskin, *Growing Share of DC Renters Spend at Least Half of Their Income on Rent*, WAMU/DCist (September 19, 2023), https://www.npr.org/local/305/2023/09/19/1200323237/growing-share-of-d-c-renters-spend-at-least-half-of-their-income-on-rent; National Low Income Housing Coalition, "District of Columbia" (2023), https://nlihc.org/sites/default/files/oor/DC_2023_OOR.pdf; Claire Zippel, DC's Housing Affordability Crisis in 7 Charts, Greater Greater Washington (April 30, 2015), https://ggwash.org/view/37967/dcs-housing-affordability-crisis-in-7-charts.

⁸ Office of the Chief Financial Officer, "FY 2025 Proposed Budget Documents," *available at*: https://cfo.dc.gov/node/289642. The Mayor's proposed budget does not include the increase in program funding that would be required to add new vouchers in the FY25 budget. In conversations with

advocates, representatives from the Mayor's Office of Budget and Finance confirmed that the Mayor's proposed budget did not include any new PSH or TAH vouchers.

⁹ Solari, Claudia D., et. al., *Housing Insecurity in the District of Columbia*, Urban Institute, November 2023, p. 28, *available at*: https://www.urban.org/sites/default/files/2023-

<u>11/Housing%20Insecurity%20in%20the%20District%20of%20Columbia</u> <u>0.pdf</u>. Please note, while TAH and PSH vouchers are available to both individuals (TAH-I and PSH-I) and families (TAH-F and PSH-F), Children's Law Center will only speak to the family programs used by our clients.

¹⁰ The District's initial increased investments in long-term vouchers were included in the FY22 budget (October 2021 – September 2022) and the number of homeless families counted in the District's Point-in-Time Count decreased by 14% between January 2021 and January 2022. Metropolitan Washington Council of Governments (COG), Homelessness in Metropolitan Washington (May 2022), p. 87.

¹¹ Annemarie Cuccia, "Council Adds 400 Housing Vouchers to Budget in First Vote," Street Sense Media (May 18, 2022), available at: https://streetsensemedia.org/article/council-adds-400-housing-vouchers-to-budget-in-first-vote/; DC Fiscal Policy Institute, "What's in the Fiscal Year 2024 Budget?," (June 26, 2023), available at: https://www.dcfpi.org/all/whats-in-the-fiscal-year-2024-budget/.

¹² Fair Budget Coalition, *Safety is Investing in Community: Shifting Power and Resources to the People*, (2024), *available at:* https://fairbudget.org/wp-content/uploads/2024/03/Desktop-View.pdf. These numbers come from an informed estimate of the number of families that will be exited from Rapid Re-Housing in FY25 and account for the percent of families that will be able to afford rent at the time of exit and the percent of families that will be eligible for a PSH voucher. For further details, please contact Makenna Osborn at Children's Law Center at mosborn@childrenslawcenter.org.

¹³ Responsibility and funding for TAH and PSH vouchers is split between DHS and the District of Columbia Housing Authority (DCHA). TAH family vouchers are funded in the DCHA budget and PSH family vouchers are funded in the DHS budget. *See* FY24 DHS Budget, Table JA0-4; FY24 Housing Authority Subsidy, Table HY-04. *See also* Fair Budget Coalition, *Safety is Investing in Community: Shifting Power and Resources to the People*, (2024), *available at:* https://fairbudget.org/wp-content/uploads/2024/03/Desktop-View.pdf. DHS is responsible for identifying and connecting (or matching) eligible families with TAH and PSH vouchers and supportive services. DHS, Voucher Process, "A Path to Ending Chronic Homelessness in DC,"

https://storymaps.arcgis.com/stories/993e532a43bd4af3a2bf1b69d54dc704.

¹⁴ According to data reported by The Community Partnership to the Interagency Council on Homelessness Family System Workgroup, as of February 14, 2024, just over 50% of TAH and PSH family vouchers funded in FY23 had been matched to an eligible family (136 of 395 TAH-F vouchers and 348 of 570 PSH-F vouchers = 484 of 965 total family vouchers. Interagency Council on Homelessness: Family System Workgroup, PowerPoint (February 14, 2024), slide 16 (on file with Children's Law Center). *See also* Data reported on the DHS Voucher Utilization Tracker "A Path to Ending Chronic Homelessness in DC" as of Mar. 15, 2024.

¹⁵ FY24 Department of Human Services Performance Oversight Reponses, response to Q87, available for download at: https://lims.dccouncil.gov/Hearings/hearings/239.

¹⁶ FY24 DHS Budget, Table JA0-4, p. E-69, available at:

https://app.box.com/s/v3scx0crk2ulukjob253aqexjdrkzs1k; FY24 Housing Authority Subsidy Budget, Table HY0-4, p. B34-35, available at: https://app.box.com/s/wjiy9uv4tntch5bmjt978fi61ilp56j9.

No new TAH-F vouchers were funded in the FY24 budget meaning that if DHS finishes matching the FY23-funded vouchers by the end of June 2024, the agency will have no vouchers available to match families with beginning in July 2024 (unless and until there is program turnover). 80 PSH-F vouchers were funded in the FY24 budget and if DHS achieves its goal of matching all FY23-funded vouchers by

the end of June 2024, those vouchers will all be matched to families by early October 2024 (assuming that DHS maintains the pace of matching approximately 25 PSH-F vouchers/month from FY23). See FY24 Department of Human Services Performance Oversight Reponses, response to Q85 and Q87, available for download at: https://lims.dccouncil.gov/Hearings/hearings/239 (In response to Q85, 300 families entering the PSH-F program in FY23 is approximately 25 families/month).

- ¹⁷ FY24 Department of Human Services Performance Oversight Reponses, response to Q85 and Q87, available for download at: https://lims.dccouncil.gov/Hearings/hearings/239 (In response to Q85, 128 families entering the TAH-F program in FY23 is approximately 11 families per month and 300 families entering the PSH-F program in FY23 is approximately 25 families/month).
- ¹⁸ These figures are based on the program costs used by the Washington Legal Clinic for the Homeless to prepare the Fair Budget Coalition's recommendation to fund the full need for vouchers, which are \$30,416 per family/year for TAH vouchers and \$39,312 per family/year for PSH vouchers.
- ¹⁹ National Low Income Housing Coalition, "District of Columbia" (2023), available at: https://nlihc.org/sites/default/files/oor/DC 2023 OOR.pdf.
- ²⁰ See Committee Report on B21-0157, (May 27, 2015), where the Council initially funds TAH vouchers for FY16; Elizabeth Oquendo, Children's Law Center Testimony Before the District of Columbia Council Committee on Human Services, (June 14, 2021), available at:

https://childrenslawcenter.org/resources/budget-testimony-dhs/.

- ²¹ For eligibility requirements, see DC Department of Human Services, "Permanent Supportive Housing for Individuals and Families," available at: https://dhs.dc.gov/page/permanent-supportive-housingindividuals-and-families-project-based-tenant-based-localveterans#:~:text=Eligibility%3A,Limited%20income%20earning%20potential.
- ²² A year with a PSH voucher costs an average of \$39,312 per family while a TAH voucher costs \$30,416
- per family. These cost estimates were compiled by the Washington Legal Clinic for the Homeless for the Fair Budget Coalition. For further details, please contact Makenna Osborn at mosborn@childrenslawcenter.org. ²³ For example, while the Mayor's proposed FY25 budget does not include funding for any new vouchers,
- it does include an enhancement of \$30 million for Rapid Re-Housing for families. FY25 Department of Human Services, table JA0-5, p. E-73 and E-75. Additionally, over the past few years the Mayor and DHS have expanded Rapid Re-Housing and made it the District's primary intervention for addressing family homelessness such that the District relies more heavily on our Rapid Re-Housing program than almost any other state. See Max Tipping, Set up to Fail Rapid Re-Housing in the District of Columbia, Washington Legal Clinic for the Homeless, May 2017, available at: https://www.legalclinic.org/wp-
- content/uploads/2018/03/Set-up-to-fail-2nd-edition.pdf; Kate Coventry, Bringing it All Home: How DC Can Become the First Major City to End Chronic Homelessness and Provide Higher-Quality Services, DC Fiscal Policy Institute, April 4, 2023, available at: https://www.dcfpi.org/all/bringing-it-all-home-how-dccan-become-the-first-major-city-to-end-chronic-homelessness-and-provide-higher-quality-services/; Solari, Claudia D., et. al., Housing Insecurity in the District of Columbia, Urban Institute, November 2023, p. 28, available at: https://www.urban.org/sites/default/files/2023-

11/Housing%20Insecurity%20in%20the%20District%20of%20Columbia 0.pdf.

- ²⁴ Makenna Osborn, Children's Law Center Testimony Before the District of Columbia Council Committee on Housing, (Feb 29, 2024), available at: https://childrenslawcenter.org/resources/2023-24oversight-testimony-department-of-human-services/.
- ²⁵ See Id. at 7 (describing the experience of a family CLC represents that was living in a Rapid Re-Housing unit with "poor ventilation and mold contamination, which exacerbated several of their young children's asthma"); Makenna Osborn, Children's Law Center Testimony Before the District of Columbia Council

Committee on Housing, (Feb 23, 2023), *available at*: https://childrenslawcenter.org/resources/fy23-oversight-testimony-department-of-human-services/ (describing clients' units paid for by Rapid Re-Housing subsidies that were infested with mice, lacked sufficient heat, and had significant electrical hazards and mold issues).

²⁶ Year after year some of the worst conditions we see are in units paid for with Rapid Re-Housing Funding. *See* Kathy Zeisel, Children's Law Center, Testimony Before the District of Columbia Council Committee on Human Services, (February 24, 2022), *available at*: https://childrenslawcenter.org/wp-content/uploads/2022/02/Zeisel-2022-DHS-Oversight-testimony-FINAL.pdf; Elizabeth Oquendo, Testimony Before the District of Columbia Council Committee on Human Services, (June 14, 2021), *available at*: https://childrenslawcenter.org/wp-content/uploads/2021/07/DHS-Budget-Testimony-FY22-Childrens-Law-Center-Final.pdf; Kathy Zeisel, Children's Law Center Testimony Before the District of Columbia Council Committee on Human Services and Committee on Housing & Neighborhood Revitalization, (January 29, 2020), *available at*: https://childrenslawcenter.org/wp-content/uploads/2021/07/Zeisel-FY19-DHS-Oversight-testimony-final.pdf; Diana Sisson, Testimony Before the District of Columbia Council Committee on Human Services, (April 10, 2018), *available at*: https://childrenslawcenter.org/wp-content/uploads/2021/07/Testimony-Before-the-District-of-Columbia-Council-FINAL-FORMATTED-nj.pdf.

²⁷ Department of Human Services, Notice of Emergency and Proposed Rulemaking, 71 D.C. Register 003298 – 003325 (March 22, 2024), available at https://www.dcregs.dc.gov/Common/NoticeDetail.aspx?NoticeId=N135494. These new regulations 1) harden the program's arbitrary time-limit to 12 months for most participants and an absolute maximum of 18 months, 2) allege to adopt "voluntary" case management but the services are only voluntary in name because participants face negative consequences – like not being able to request an extension if they opt out of case management, 3) make it much more difficult for participants to request and be eligible to receive an extension in the program all of which will result in more families losing Rapid Re-Housing rental assistance before establishing any path to long-term housing stability. For a more detailed analysis of the regulations, please request a copy of Children's Law Center's forthcoming comments.

²⁸ B25-0047, *Rapid Re-Housing Reform Amendment Act of* 2023.