



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 the Judiciary & Public Safety
February 25, 2025

Public Hearing:
FY24 Performance Oversight
Office of the Attorney General

Danielle Robinette
Senior Policy Attorney
Children's Law Center

Introduction

Good morning, Chairwoman Pinto, members of the Committee, and staff. My name is Danielle Robinette, and I am a Senior Policy Attorney at Children's Law Center. 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.

Our work at Children's Law Center intersects often with that of the Office of the Attorney General (OAG) – as counsel in family court cases, as a partner in protecting tenants, and in the development of law and policy that impacts DC children and families. While we may not always agree on specific cases or policy issues, we want to commend OAG's willingness to collaborate on ways to improve the lives of District residents. Our testimony today arises from our experience working with OAG in the areas of school attendance, healthy housing, and child welfare. Specifically, we thank OAG for their supportive approach to truancy prevention, their consistent pursuit of safe and healthy

housing for low-income tenants, and their partnership in improving the District's child welfare system.

OAG Meaningfully Supports DC Students and Families in Overcoming Barriers to Regular School Attendance

Over the past year, the District has focused on the persistently high rates of chronic absenteeism among DC students. Both the Council and the Executive have invested time and resources to identifying and addressing students' barriers to regular school attendance.¹ For many years, OAG has recognized that "[t]ruancy is virtually always symptomatic of underlying issues that exist in a child's life."² Despite changing trends in local political discourse, OAG has maintained their commitment to supportive truancy programming that identifies and addresses attendance barriers faced by students and families. The Agency's approach prioritizes ensuring that "youth and their families have access to community-based services and District resources *before* engaging them in the juvenile justice system"³ (emphasis added) and using "prosecution as a last resort."⁴ We commend the agency for their steadfast focus on supporting students and avoiding ineffective punitive measures.

OAG's approach to truancy reduction is backed by local and national⁵ experts in the field. A 2020 report from the DC Juvenile Justice Advisory Group recommended that the District should avoid unnecessary system involvement for status offenses – including truancy.⁶ Instead, the JJAG report recommends an expansion of community- and school-based hub model that connects families with the relevant city services.⁷ This is consistent

with national research finding that using the juvenile justice system to address absenteeism does not improve school attendance. One study found that “youth who became involved with the juvenile justice system missed, on average, five additional days of school—a statistically significant difference.”⁸ Additional research found that an “overarching correlate of chronic absence may be poverty. Homelessness, housing instability, family obligations such as caring for younger siblings or elderly family members, and lack of a safe path to school are poverty-related barriers that prevent students from consistently attending schools.”⁹ Prosecution, or the threat thereof, does not successfully deter truancy because it cannot remediate the underlying drivers of student absenteeism. OAG continues to follow research and best practices in their approach to truancy reduction.

OAG’s practice of limiting prosecution does not mean the agency has abdicated its responsibility to respond to truancy. For older youth (13-17) referred for truancy, OAG may, before pursuing prosecution, refer a young person to the Intensive Care Coordination (ICC) program at the Department of Behavioral Health (DBH) or divert the student to a truancy prevention program – namely the Alternative to Court Experience (ACE) and the Parent and Adolescent Support Services (PASS) intensive case management program run by Department of Human Services (DHS).¹⁰ OAG reports that in FY24, 67 youth were referred to ICC and 101 truancy cases were diverted to ACE.¹¹ Diversion programs like ACE and PASS can prevent harmful interactions with the juvenile justice system and

connect the student to supportive services to address the family's underlying attendance barrier. An expansion of the PASS model is currently being piloted by DHS per the Pilot Truancy Reduction Temporary Amendment Act of 2024.¹² The first preliminary report on this pilot is due to the Council on March 31, 2025.¹³

For younger students, OAG operates the Addressing Truancy Through Engagement and Negotiated Dialogue (ATTEND).¹⁴ This program offers an alternative to the traditional court system that brings parents and schools together with a trained mediator to identify attendance barriers and develop a plan to overcome challenges and improve school attendance. OAG reports that more than 75% of students and families referred to ATTEND successfully completed mediation.¹⁵ In FY24, OAG expanded this program to two new schools, the first from the charter sector.¹⁶ We thank OAG for their continued commitment to providing DC students and families with supportive programming instead of harmful and ineffective involvement in the juvenile justice system. We urge the Committee to continue supporting OAG's truancy reduction work.

OAG Holds Landlords Accountable for Putting Tenant Health and Safety at Risk

Poor housing conditions can profoundly impact a child's well-being.¹⁷ Each year, Children's Law Center works with hundreds of District families living in rental housing with unsafe and unsanitary conditions like mold, pest infestations, and inadequate heat that are harming a child's health.¹⁸ Given the dearth of affordable housing units and the unwillingness of many landlords to accept rental subsidies, many families feel that

properties with substandard conditions are their only option.¹⁹ DC law recognizes the importance of a safe and healthy living environment for *all* tenants — regardless of the source of income they use to pay rent — and establishes standards that housing providers must uphold to operate in the District.²⁰ OAG’s Public Advocacy Division²¹ plays a vital role in holding landlords accountable for violating these laws.

While legal service providers like Children’s Law Center assist individual tenants with claims against their landlord, OAG can address poor conditions at an entire property or discriminatory practices across a housing provider’s portfolio through one lawsuit. To that end, OAG litigation is an important enforcement tool for securing remedies for District tenants and effectively deterring bad actors from violating the law in the first place and OAG’s Public Advocacy Division is a valued partner in Children’s Law Center’s work to promote safe and healthy rental housing across the District.

The District’s primary mechanism for protecting tenants from poor housing conditions is the Department of Building’s (DOB) housing code inspection and enforcement process. However, for properties with chronic health and safety issues, an OAG lawsuit can more effectively hold landlords accountable and secure relief for tenants because OAG’s enforcement authority is not limited to the housing code.²² For example, OAG can use the Tenant Receivership Act to appoint a third party to make repairs a landlord has not,²³ the Consumer Protection Procedures Act to stop landlord’s from engaging in unfair business practices like deceptive fees,²⁴ and the False Claims Act

to hold landlords liable for profiting from District-funded housing subsidies while failing to meet their basic obligations to tenants.²⁵

These enforcement tools enable OAG to strategically pursue action against some of the worst landlords in DC — those with a history of evading accountability and a pattern of prioritizing profit margins at the expense of tenant well-being and District laws. For example, over the past several years Children’s Law Center has consistently received referrals for families living in harmful conditions in properties owned by Ali “Sam” Razjooyan or his associates. The lack of landlord engagement in those cases has delayed our clients’ ability to secure timely repairs through DC’s Housing Conditions Court.²⁶ On August 30, 2024, OAG filed two lawsuits against Razjooyan for the “deplorable, unsafe, [and] horrific conditions” that tenants have suffered in his properties at W St. SE and Minnesota Commons.²⁷ Thanks to OAG’s lawsuits, families in these two properties could receive significant rent abatement or other monetary restitution, which is difficult to secure through individual tenant cases for housing code violations.²⁸ Since filing, OAG has won emergency relief for repairs in one of cases and continues to seek additional repairs, restitution for tenants, and penalties.²⁹ Children’s Law Center hopes that meaningful accountability for the harm caused to tenants will make it easier to prevent Razjooyan from continuing his exploitative practices at his many other DC properties. Moreover, enforcement and accountability will hopefully deter other housing providers from engaging in similar practices moving forward.

In addition to litigation tools like the suits against Razjooyan, we also commend OAG's Public Advocacy Division for their development of innovative alternative dispute resolution opportunities. Specifically, we want to highlight the OAG Mediation program in the Office of Consumer Protection which has supported tenants when traditional lawsuits are not viable. In our work, we see that too often landlords are not held accountable because they cannot be identified or will not engage in court processes. For example, we see cases where property management staff changes without providing tenants a new point of contact or the landlord fails to maintain a registered agent to receive service of process. In these instances, we can turn to OAG Mediation to seek alternative resolution for our clients. Recently, we engaged the OAG Mediation program to support a client who had an open housing court case for over a year. Despite court orders and inspections conducted by the Department of Buildings (DOB), repairs came slowly or not at all. Over time, communication and trust between the tenant and landlord broke down. We engaged OAG Mediation, and they joined as a calm and responsive third party. As a mediator, they were able to cut through the tension and get to the heart of what needed to be done. The team quickly responded to my client's request for help, patiently listened to both sides, and kept communication open - documenting everything through clear and accurate emails along the way. With the help of OAG Mediation, a frustrating stalemate finally took meaningful steps toward resolution.

Children’s Law Center commends OAG for launching its new Housing Protection and Affordability Initiative in January 2025 to further “streamline and prioritize” OAG’s work to preserve and promote safe, healthy, and affordable rental housing for District families.³⁰ We are especially excited that the Initiative includes the creation of a Special Counsel for Housing Code Enforcement. It is our understanding that this position will work closely with DOB to strengthen and amplify their enforcement actions. We encourage the Committee to seek details from OAG regarding how this restructuring will strengthen and expand OAG’s existing housing work. Additionally, Children’s Law Center remains concerned with the trend of property owners declaring bankruptcy when stiff penalties are imposed through OAG litigation, further delaying the time it takes for tenants to actually see repairs or other relief.³¹ To that end, we hope the Housing Protection and Affordability Initiative team can explore how OAG’s litigation tactics can strike the appropriate balance between punishing negligent landlords, securing successful outcomes for tenants in a timely manner, and preserving the District’s affordable housing stock.

OAG Engages in Meaningful Community Engagement and Partnership in its Child Welfare Work

Children’s Law Center represents approximately half of the children involved with the DC Child and Family Services Agency (CFSA) – several hundred children in foster care and protective supervision each year.³² Through this casework, we interact daily with OAG’s Family Services Division. Under the leadership of Erin Cullen, Deputy

Attorney General of OAG's Family Services Division, the Agency has built a strong partnership with Children's Law Center. OAG meets with us regularly to resolve case-specific issues and collaborates with us to improve child welfare policy and practice more broadly in the District, including through the development of legislation. We greatly value the open communication and trust that is being built between our two organizations, and though we may not always agree, we hope that continuing to strengthen this partnership will result in more effective problem-solving and policy developments that improve the lives of child welfare-involved families in the District.

Of particular note, over the past year OAG has worked closely with Children's Law Center, CFSA, and members of the community to develop a proposal for a new legal permanency option designed to better meet the specific needs of older youth in care. When a court finds that a child has been neglected by their parents, that child generally has three pathways to achieving permanency and closing their case: reunification with their parents, adoption, or guardianship.³³ Although these options work for many children in care, some – typically older youth – find that none of the traditional pathways are suitable for their unique situation. These youth are left to “age out” of the system – exiting the care of CFSA at the age of 21.³⁴ Approximately 50-60% of older youth in care age out of the system³⁵ – entering the adult world without a permanent family; without the sustained support that everyone needs to be successful in life. Challenges and struggles are part of becoming an adult, and no one should have to navigate them alone.

Recognizing the harms of aging out and that traditional permanency options are ill-suited to meet the needs of older youth,³⁶ a coalition of stakeholders has worked to develop a proposal for a new legal permanency option in the District: SOUL which stands for Support, Opportunity, Unity & Legal Relationships. In partnership with CFSA, Children's Law Center, a group of former and current foster youth ("Lived Experience/LEX Leaders") and others, OAG has been a key support in this work.

SOUL is a new, youth-driven permanency goal for older youth (16+) in foster care. SOUL legally recognizes and supports the circle of loving adults in an older youth's life who are committed to their future. By choosing a SOUL permanency goal, older youth can create a permanent family and codify legal relationships with multiple caregivers and supporters, including people from their families of origin.

The District is one of the first jurisdictions to begin implementing this concept, putting CFSA and OAG at the forefront of figuring out how to adapt to the shifting demographics of the foster care population.³⁷ Children's Law Center has for many years expressed concerns that older youth are languishing in foster care.³⁸ We applaud both agencies for acknowledging the multitude of ways the current system does not work for older youth and proactively seeking a creative solution.

We must also commend OAG and CFSA for prioritizing youth and community voices throughout the development of the SOUL proposal. LEX Leaders co-chaired every working group and were at the table for every discussion. The resulting legislative

proposal is stronger because of the input and leadership of those most impacted by the child welfare system – the youth in it. We are excited for this proposed legislation to move forward and hope to see the members of this Committee and the full Council do everything in their power to pass and fund it as swiftly as possible.

Conclusion

Thank you for the opportunity to testify today and I welcome any questions.

¹ The State Board of Education held a panel on Identifying Truancy and Chronic Absenteeism Interventions in Schools, *see* District of Columbia State Board of Education, Public Meeting (Jan. 17, 2024), *recording available at*: <https://www.youtube.com/watch?v=5vpEFslIY30&list=PLc9Yooaf1xFROBf1O-6dvWvSleaVGZUO8&index=7> (panel begins at 20:42); the SBOE also passed a Resolution recommending policies that address chronic absenteeism and truancy, District of Columbia State Board of Education, SR24-7 Recommending Policies that Address Chronic Absenteeism and Truancy, *available at*: <https://sboe.dc.gov/sites/default/files/dc/sites/sboe/publication/attachments/Recommending%20Policies%20that%20Address%20Chronic%20Absenteeism%20and%20Truancy%20SR24-7.pdf>; and the SBOE published an analysis of the four attendance bills considered by the Committee, District of Columbia State Board of Education, “Crosswalk: Chronic Absenteeism & Truancy” (Sept. 2024), *available at*: https://sboe.dc.gov/sites/default/files/dc/sites/sboe/release_content/attachments/2024-09-17-SBOE_Crosswalk_ChronicAbsenteeism%26Truancy_0.pdf.

The Office of the State Superintendent has begun publishing mid-year data snapshots, *see e.g.*, Office of the State Superintendent of Education, “2023-24 Mid-Year Attendance Brief,” https://osse.dc.gov/sites/default/files/dc/sites/osse/page_content/attachments/Mid_Year%20Attendance_1_Pager%203_29_2024.pdf;

The Every Day Counts! Taskforce, under the Deputy Mayor for Education, undertook a year-long strategic planning process that culminated in their recent relaunch summit that brought together government and community partners to hear from panels comprised of national experts, DC school leaders, and DC students, *see* <https://meetingthemomenteverydaycounts.splashthat.com/>. At this summit, Deputy Mayor Kihn announced that D.C. has joined 14 states in a commitment to cut chronic absenteeism by 50% over the next five years. For more information on the 50% Challenge, *see* Attendance Works, Toolkits, “50% Challenge: Crating a State Road Map” (Sept. 2024), *available at*: <https://www.attendanceworks.org/resources/toolkits/the-50-challenge-crafting-a-state-road-map/>.

² Alicia Washington, Office of the Attorney General for the District of Columbia, Testimony Before the Council of the District of Columbia, Comm. of the Whole, Public Hearing on Chronic Absenteeism and Truancy, p. 2 (Nov. 13, 2024), *available for download at*: <https://lims.dccouncil.gov/Hearings/hearings/536>

³ Office of the Attorney General, Responses for FY24 Performance Oversight Hearing, at Q62, p. 83 (Feb. 25, 2025), *available for download at*: <https://lims.dccouncil.gov/Hearings/hearings/652>

⁴ Dana Edwards, Office of the Attorney General for the District of Columbia, Testimony Before the Council of the District of Columbia, Comm. of the Whole, Public Roundtable on Attendance, Chronic Absenteeism, and Truancy in the District (Nov. 30, 2022), *available at*: <https://oag.dc.gov/release/oag-testimony-attendance-chronic-absenteeism-and#:~:text=Under%20Attorney%20General%20Racine's%20leadership,causing%20kids%20to%20miss%20school.>

⁵ *See, e.g.*, Phyllis Jordan & Hedy Chang, *State Strategies for Fighting Chronic Student Absenteeism* (Aug. 23, 2023), *available at*: <https://www.future-ed.org/state-strategies-for-fighting-chronic-student-absenteeism/> (finding “no evidence that punishing students for missed days leads to better attendance”); *see also*, Dr. Robert Balfanz, Everyone Graduates Center, Johns Hopkins University, Testimony Before the DC Council Committee of the Whole Public Roundtable on Student Absenteeism and Discipline (May 13, 2024), at 47:25, *available at*: <https://www.youtube.com/watch?v=H9jrS7XS4QQ&t=4061s> (testifying that “the evidence base is fairly overwhelming that prevention and family engagement is much more effective than punitive”).

-
- ⁶ See, e.g., District of Columbia Juvenile Justice Advisory Group, Office of Victim Services and Justice Grants, “Create New Opportunities for ‘Persons In Need of Supervision’ (PINS) to Succeed Without Legal System Intervention: District of Columbia Juvenile Justice Advisory Group Recommendation to Mayor Bowser,” p. 15 (Feb. 21, 2020), available at: https://ovsjg.dc.gov/sites/default/files/dc/sites/ovsjg/service_content/attachments/JJAG%20PINS%20Alternatives%20Report%20February%202020.pdf
- ⁷ Id., at 16-17.
- ⁸ See Josh Weber & Rebecca Cohen, The Council of State Governments Justice Center, *Rethinking the Role of the Juvenile Justice System: Improving Youth’s School Attendance and Educational Outcomes*, at 9-10 (Sept. 2020), available at: https://csgjusticecenter.org/wp-content/uploads/2020/09/CSG_RethinkingtheRoleoftheJuvenileJusticeSystem_15SEPT20.pdf.
- ⁹ Kathryn Van Eck, et al., *How school climate relates to chronic absence: A multi-level latent profile analysis*, 61 J. SCH. PSYCHOLOGY 89, 90 (2017), available at: https://www.attendanceworks.org/wp-content/uploads/2018/04/How_School-Climate_relates_to_chronic-absence_attendance_works_1-s2.0-S0022440516300607-main.pdf
- ¹⁰ See OAG, Responses for FY24 Performance Oversight Hearing, *supra* note 3, at Q62, p. 83.
- ¹¹ Id., at Q62, p. 84.
- ¹² See B25-0913, *the Pilot Truancy Reduction Temporary Amendment Act of 2024*.
- ¹³ DC Code § 38-208(c-1)(3).
- ¹⁴ See Office of the Attorney General for the District of Columbia, “Keeping Kids in School,” available at: <https://oag.dc.gov/public-safety/keeping-kids-school>.
- ¹⁵ Alicia Washington, Office of the Attorney General for the District of Columbia, Testimony Before the Council of the District of Columbia, Comm. of the Whole, Public Hearing on Chronic Absenteeism and Truancy, p. 3 (Nov. 13, 2024), available for download at: <https://lims.dccouncil.gov/Hearings/hearings/536>
- ¹⁶ See OAG, Responses for FY24 Performance Oversight Hearing, *supra* note 3, at Q25, p. 39.
- ¹⁷ Living in housing with substandard conditions is a consistent and strong predictor of emotional and behavioral problems in children and exposure to certain conditions, especially mold and pests, is closely associated with increased asthma prevalence and severity in children. Levine Coley et. al., *Poor Quality Housing Is Tied to Children’s Emotional and Behavioral Problems*, MacArthur Foundation: How Housing Matter (Sept. 2013), available at: <https://housingmatters.urban.org/sites/default/files/wp-content/uploads/2014/09/How-Housing-Matters-Policy-Research-Brief-Poor-Quality-Housing-Is-Tied-to-Childrens-Emotional-and-Behavioral-Problems.pdf>; Ganesh et. al., *The Relationship between Housing and Asthma Among School-Age Children*, Urban Institute (Oct. 2017), available at: https://www.urban.org/sites/default/files/publication/93881/the-relationshi-between-housing-and-asthma_2.pdf. Rent burden (paying over 30% of household income toward rent) and eviction are “significantly associated with higher mortality risk” likely due to renters prioritizing housing costs over spending on health-related needs, including preventive care. Graetz et. al., *The Impacts of Rent Burden and Eviction on Mortality in the United States, 2000-2019*, *Social Science & Medicine* 340 (2024). See also, Weitzman et. al., *Housing and Child Health*, 43 *Current Problems in Pediatric and Adolescent Health Care* 187 (Sept. 2013) (how the physical, chemical, and biological aspects of a child’s home impact their health and development).
- ¹⁸ Children’s Law Center’s innovative medical legal partnership, Healthy Together, places attorneys at primary care pediatric clinics throughout the city with Children’s National, Unity Health Care, and Mary’s Center to receive referrals from pediatric providers for assistance with non-medical barriers to a child’s health and well-being. See Children’s Law Center, available at: <https://childrenslawcenter.org/our-impact/health/>.

¹⁹ Such as the Housing Choice Voucher Program (HCVP), *see* Center on Budget and Policy Priorities, *Policy Basics: The Housing Choice Voucher Program*, available at: <https://www.cbpp.org/research/housing/the-housing-choice-voucher-program>; Local Rent Supplement Program (LRSP), which is funded by and Family Re-Stabilization Program (FRSP, commonly known as Rapid Re-Housing), DHS, “Rapid Rehousing for Individuals,” available at: <https://dhs.dc.gov/page/rapid-rehousing-individuals>.

²⁰ *See* D.C. Mun. Regs. tit. 14, §§ 106, 301, 400-999 (housing code/warranty of habitability); DC Code § 8-231, Lead-Hazard Prevention and Elimination (elimination of lead-based paint hazards in properties with special protections for housing occupied by young children); DC Code § 8-241, Residential Indoor Mold Assessment and Remediation (requirements to assess and remediate of residential indoor mold); DC Code § 2-1402.21, Housing and Commercial Space: Prohibitions (protection from housing discrimination).

²¹ Office of the Attorney General, Responses for FY23-24 Performance Oversight Hearing, at 2 (Feb. 21, 2024), available at: <https://lims.dccouncil.gov/Hearings/hearings/264>.

²² *See* Office of the Attorney General for the District of Columbia, “Tenant Receivership Act Information,” available at: <https://oag.dc.gov/tenant-resources/how-oag-can-help/tenant-receivership-act-information>

²³ *See* *id.*; *see also* DC Code § 42-3651.01 *et seq.*

²⁴ *See* Office of the Attorney General for the District of Columbia, “How OAG Can Help,” available at: <https://oag.dc.gov/tenant-resources/how-oag-can-help>; *see also* DC Code § 28-3901-3913.

²⁵ *See* Office of the Attorney General for the District of Columbia, “Attorney General Schwalb Sues District Slumlord for Egregious Housing Code Violations, Disregarding Stop Work Orders & Defrauding Rapid Re-Housing Program” (Sept. 9, 2024), available at: <https://oag.dc.gov/release/attorney-general-schwalb-sues-district-slumlord>; *see also* DC Code § 2-381.01 to 2-381.09.

²⁶ In multiple Housing Conditions Court cases at properties owned by Razjooyan or his associates, a representative for the landlord failed to appear at hearings, causing hearings to be rescheduled and/or requiring our attorneys to go through extra steps to ask the Court to force the landlord to appear before the case could move forward; and meanwhile no one associated with the property responded to our communications via email or phone to attempt to engage on the requested repairs.

²⁷ *See* Office of the Attorney General for the District of Columbia, “Attorney General Schwalb Sues District Slumlord for Egregious Housing Code Violations, Disregarding Stop Work Orders & Defrauding Rapid Re-Housing Program” (Sept. 9, 2024), available at: <https://oag.dc.gov/release/attorney-general-schwalb-sues-district-slumlord>; *see also* Aaron Wiener, “D.C. AG sues landlord for ‘horrendous’ conditions in subsidized housing scheme,” WASHPOST (Sept. 9, 2024), available at: <https://www.washingtonpost.com/dc-md-va/2024/09/09/dc-ag-sues-landlord/>

²⁸ HCC does not grant any monetary relief; the only relief tenants can seek is “compliance with the housing and property maintenance code regulations.” HCC can order rent abatement but only as a sanction “if necessary to achieve compliance.” *See* Case Management Plan for the Housing Conditions Civil Calendar, DC Superior Court (Rev. April 2024), <https://www.dccourts.gov/sites/default/files/Housing-Conditions-Case-Management-Plan.pdf>.

²⁹ *See* OAG, Responses for FY24 Performance Oversight Hearing, *supra* note 3, at Q25, p. 37.

³⁰ *See* Office of the Attorney General for the District of Columbia, “Attorney General Schwalb Announces Initiative Prioritizing Housing Protection and Affordability” (Jan. 13, 2025), available at: <https://oag.dc.gov/release/attorney-general-schwalb-announces-initiative>

³¹ *See e.g.*, Khalida Volou, “Marbury Plaza Apartments in SE DC files for bankruptcy after judge orders 50% cut in rents,” ABC7 (Sept. 1, 2023) available at: <https://wjla.com/news/local/marbury-plaza-apartments-southeast-dc-tenants-residents-bankruptcy-cut-in-rent-living-conditions-cost-lawsuit-superior-court-judge-kravitz-barbara-cooper-financial-inflation>.

³² DC Children’s Law Center, “About Us,” *available at:*

<https://www.childrenslawcenter.org/content/about-us>; Tami Weerasingha-Cote, testimony before DC Council’s Committee of the Whole (Feb. 20, 2024), *available at:*

<https://childrenslawcenter.org/resources/2023-24-oversight-testimony-child-and-family-services-agency/>.

³³ Alternative Planned Permanent Living Arrangement (APPLA) is a last-resort permanency option once reunification, adoption by kin, permanent guardianship by kin, or non-kin adoption resources have been exhausted and/or have been determined not to be in the best interests of the child; legal custody happens when the agency supports legal custody to an individual who has demonstrated a commitment to assuming long-term responsibility for a child is pursued as a permanency goal only under rare and specific circumstances; reunification happens when the agency works with the birth parent or caregiver from whom the child was removed, and their supports, to ameliorate conditions of neglect such that the child can safely return home; adoption happens if safe reunification is not a viable option, the agency will pursue adoption for the child with kin or the current resource provider based on whomever is most clinically appropriate, and if neither is an option, by recruiting a new adoptive resource; and guardianship may be pursued in lieu of adoption if neither reunification nor adoption is a viable option; the agency shall pursue guardianship for the child with willing kin or, under certain circumstances, a non-kin resource. *See* Child and Family Services, Permanency Practice, (May 19, 2020), *available at:* https://cfsa.dc.gov/sites/default/files/dc/sites/cfsa/publication/attachments/Permanency_Practice_Policy_FINAL%20%282%29_0.pdf; DC Code Title 4. Public Care Systems, Chapter 12. Child Abuse and Neglect. Subchapter I. Prevention of Child Abuse and Neglect, Part C. Child and Family Services Agency § 4–1303.03. Duties and powers of the Director; Public Law 105–89.

³⁴ Alternative Planned Permanent Living Arrangement (APPLA) is a last-resort permanency option once reunification, adoption by kin, permanent guardianship by kin, or non-kin adoption resources have been exhausted and/or have been determined not to be in the best interests of the child. APPLA is only available for youth 16 or older. The social worker shall work actively with youth with to build lifelong connections, re-engage family, and achieve a successful transition to adulthood by setting and accomplishing goals across a series of critical domains, such as housing, education, employment, and physical and mental health. *See* Child and Family Services, Permanency Practice, (May 19, 2020), *available at:*

https://cfsa.dc.gov/sites/default/files/dc/sites/cfsa/publication/attachments/Permanency_Practice_Policy_FINAL%20%282%29_0.pdf.

³⁵ Child and Family Services Agency (CFSA), *FACES.net* management report CMT 367, “Children who Exited Care for Calendar Year 2024,” pulled January 30, 2025.

³⁶ Older foster youth represent the largest number of youths who experience multiple placement disruptions. Of the 39 youth who experienced 5 or more placement disruptions, 22 of them were 16 years or older. Of the 60 youth who experienced 4 or more placement disruptions, 29 of them were 16 years or older. *See* FY2023 Child and Family Services Agency Performance Oversight Responses, response to Q147, *available at:* <https://lims.dccouncil.gov/Hearings/hearings/253>. Older foster youth represent the largest number of youths who experience multiple placement disruptions. Of the 40 youth who experienced 5 or more placement disruptions, 23 of them were 16 years or older. Of the 73 youth who experienced 4 or more placement disruptions, 23 of them were 16 years or older. FY2024 Child and Family Services Agency Performance Oversight Responses, response to Q168, *available at:*

<https://lims.dccouncil.gov/Hearings/hearings/698>; Tami Weerasingha-Cote, testimony before DC Council Committee on Human Services, (February 17, 2022), *available at:* https://childrenslawcenter.org/wp-content/uploads/2022/02/TWeerasingha-Cote_Childrens-Law-Center-Testimony-for-Feb.-17-2022-CFSA-Oversight-Hearing_FINAL.pdf; Sharra E. Greer, testimony before DC Council Committee on Facilities

and Family Services, (February 24, 2023), *available at:* https://childrenslawcenter.org/wp-content/uploads/2023/02/Sharra-E.-Greer_Childrens-Law-Center_Performance-Oversight_FY2022-23-CFSA_final.pdf; Tami Weerasingha-Cote, testimony before DC Council Committee on Facilities and Family Services, (February 20, 2024), *available at:* <https://childrenslawcenter.org/resources/2023-24-oversight-testimony-child-and-family-services-agency/>.

³⁷ In FY2023, older youth (16 and older) represented 33% of the foster population (165 out of 496). *See* FY2023 Child and Family Services Agency Performance Oversight Responses, response to Q146, *available at:* <https://lims.dccouncil.gov/Hearings/hearings/253>. In FY2024, older youth (16 and older) represented 30% of the foster population (166 out of 547). FY2024 Child and Family Services Agency Performance Oversight Responses, response to Q167, *available at:* <https://lims.dccouncil.gov/Hearings/hearings/698>.

³⁸ Tami Weerasingha-Cote, testimony before DC Council Committee on Human Services, (February 25, 2021), *available at:* https://childrenslawcenter.org/wp-content/uploads/2021/07/TWeerasingha-Cote_Childrens-Law-Center-Testimony-for-Feb.-25-2021-CFSA-Oversight-Hearing_FINAL.pdf; Tami Weerasingha-Cote, testimony before DC Council Committee on Human Services, (February 17, 2022), *available at:* https://childrenslawcenter.org/wp-content/uploads/2022/02/TWeerasingha-Cote_Childrens-Law-Center-Testimony-for-Feb.-17-2022-CFSA-Oversight-Hearing_FINAL.pdf; Sharra E. Greer, testimony before DC Council Committee on Human Services, (February 24, 2023), *available at:* https://childrenslawcenter.org/wp-content/uploads/2023/02/Sharra-E.-Greer_Childrens-Law-Center_Performance-Oversight_FY2022-23-CFSA_final.pdf.