



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

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Makenna Osborn
Policy Attorney
Children's Law Center

Introduction

Good morning, Chairperson Frumin 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 about the performance of the Department of Human Services (DHS). Each year Children’s Law Center works with hundreds of District families who are trying to provide their children with a decent and stable place to call home.¹ We see firsthand the profound impact housing insecurity can have on a child’s health, development, and ability to learn.² For our clients and the nearly 30% of families in the District — an estimated 18,907 families — who are housing insecure, the main barrier to long-term stability is the unaffordability of rent.³ DHS’s rental assistance programs are a critical resource for helping these families secure and maintain stable housing but they are under enormous pressure due to the scale of the District’s housing

affordability crisis.⁴ While lessening that pressure is beyond the capacity or mission of DHS alone, DHS *can* ensure that the rental assistance resources it has are used as efficiently and effectively as possible to help District families.

My testimony today will assess DHS's administration of three forms of rental assistance available to families. First, on temporary assistance, I will discuss why Rapid Re-Housing (also known as the Family Re-Housing Stabilization Program) fails to help most participating families and the importance of assessing the Career MAP pilot as an alternative. Second, on long-term assistance, I will highlight areas where DHS made progress in decreasing the time it takes for families to fully utilize locally funded housing vouchers and areas where DHS should target further improvements. Lastly, on one-time assistance, I will emphasize how administrative delays in the Emergency Rental Assistance Program (ERAP) are preventing tenants and housing providers from accessing funding to keep families housed and landlords financially solvent.

As Operated, the Rapid Re-Housing Program is Not Helping Families Achieve Housing Security

Through the Family Re-Stabilization Program (FRSP), more commonly known as Rapid Re-Housing (RRH), DHS provides temporary rental assistance and case management to families experiencing or at imminent risk of homelessness.⁵ According to DHS, Rapid Re-Housing has two primary goals: to minimize a family's time in shelter — by exiting them from shelter to Rapid Re-Housing or placing them in Rapid Re-Housing instead of shelter — and to support their transition to long-term housing stability.⁶

However, DHS's decision to operate Rapid Re-Housing as a strictly time-limited program where all families receive only 12 to 18 months of assistance, regardless of individual circumstances or ability to afford market rent, undermines the second goal. Children's Law Center regularly works with families in Rapid Re-Housing. In our experience, most families cannot independently afford their rent at the end of their time in the program and return to acute housing insecurity soon after their rental assistance ends, facing eviction, displacement, and homelessness.

Many of our clients find their time in Rapid Re-Housing destabilizing for their family. For example, here is the experience of one family we represented in the past year. When the family first entered Rapid Re-Housing, DHS drove the process for them to sign a lease in a property well-known to the District for a history of unsafe and unsanitary conditions. The family's apartment has had serious problems throughout their tenancy including broken appliances, electrical issues, pest infestations, leaks, and mold. These conditions have been harmful to the family's health, exacerbating a child's asthma and skin conditions, and trying to get them resolved has been time-consuming and disruptive, even forcing the family to relocate for several months. The mother has had five different case managers over three years,⁷ none of whom were responsive to her requests for support addressing the conditions in the unit. Without reliable and affordable childcare, the mother's primary focus has been caring for her young children, and she has had no change in her economic circumstances since entering Rapid Re-

Housing. The family recently received notice from DHS that they were being exited from Rapid Re-Housing for being in the program longer than 18 months. They will not be able to afford their rent when their Rapid Re-Housing assistance ends, and the mother is deeply stressed about how to keep her kids housed moving forward. If they end up being evicted from their current unit, it will be harder for them to rent another apartment in the future.⁸

Unfortunately, this family's experience is not unique and reflects problems that have been endemic to Rapid Re-Housing for years. Their experience illustrates what Children's Law Center believes are two primary issues with DHS's operation of Rapid Re-Housing:

- 1) 12 to 18 months is not enough time for the population placed in Rapid Re-Housing to experience a change in their ability to afford market rent in DC; and
- 2) The units rented to families in Rapid Re-Housing have extremely poor conditions.

Families in Rapid Re-Housing Do Not Increase Their Incomes During the Program and Cannot Afford Market Rent at Time of Exit

Like many service providers around the country, DHS initially launched its Rapid Re-Housing program in the wake of the 2008 financial crisis "as a means of helping a limited range of people who were in need of only a small amount of [temporary] support" after a job loss.⁹ Over time the Mayor and DHS have expanded Rapid Re-Housing and made it the District's primary intervention for addressing family homelessness.¹⁰

However, unlike the population Rapid Re-Housing was initially designed to serve, most families that DHS currently places in the program are housing insecure due to structural poverty and the District's housing affordability crisis, not a temporary income loss, and have never been able to support market rent for an extended period of time. Housing costs in DC are too high and wages too low for most families to go from chronic housing insecurity to having enough income to support market rent in the 12-to-18-month time limit DHS has set for Rapid Re-Housing assistance.¹¹

This reality is clearly illustrated in the data shared in DHS's pre-hearing responses. In FY24, the average monthly income of families participating in Rapid Re-Housing only marginally increased from \$1,071 at the time of program entry to \$1,222 at the time of exit or last update.¹² With a monthly income of \$1,222 a family cannot afford Fair Market Rent (FMR) for a one-bedroom apartment in DC — \$1,803 — let alone FMR for an apartment with the number of bedrooms they actually need.¹³ \$1,222 is also less than 20% of the \$6,817 monthly income the National Low Income Housing Coalition estimates a family needs to afford a two-bedroom apartment in DC.¹⁴ As a result, almost no families transition to a position of long-term, independent housing stability through Rapid Re-Housing. In FY22 and FY23, less than 1% of families who exited Rapid Re-Housing did so because they reached their financial goals for being able to afford market rent moving forward.¹⁵ In FY24, the number increased to 4% of exited families but it is still startlingly low.¹⁶

The families that do transition from Rapid Re-Housing to long-term housing stability do so via connection to a permanent voucher rather than an increase in income. In FY23, FY24, and FY25 to date, 32%, 55%, and 22% of families that exited Rapid Re-Housing, respectively, did so because they transferred to a Permanent Supportive Housing (PSH) or Targeted Affordable Housing (TAH) voucher.¹⁷ Under DHS's current eligibility requirements, to receive a PSH or TAH voucher a family must have 1) a history of "chronic homelessness," 2) a "chronic disabling condition," and 3) "limited income earning potential."¹⁸ Therefore, if a family is eligible for a PSH or TAH voucher, they were likely not in a position to increase their income enough to independently afford market rent in 12 to 18 months when they were placed in Rapid Re-Housing. Children's Law Center encourages the Committee to ask DHS if these families could be connected to vouchers earlier — i.e. from shelter or as shelter diversion — instead of being placed in Rapid Re-Housing. If a long-term voucher is the most appropriate resource for a family to achieve housing security, DHS should prioritize connecting them to a voucher as soon as possible and providing safe, stable conditions until then.

Families in Rapid Re-Housing Live in Unsafe and Health-Harming Conditions

A core component of Children's Law Center's work is helping families secure repairs when poor rental housing conditions are harming their child's health. Year after year, the worst conditions we see are in units rented by clients in the Rapid Re-Housing program. It is Children's Law Center's impression that landlords in the District know that

Rapid Re-Housing participants will likely not be able to afford their rent at the end of their time in the program. With the knowledge that a family is unlikely to stay longer than a year and that they carry a high risk of rental delinquency, landlords have little incentive to maintain habitable, code-compliant units for these families. For example, one family in Rapid Re-Housing that we are currently working with experienced serious flooding in their unit twice in one year due to leaks at the property. The landlord was not responsive to the family's requests for assistance, telling them to simply let things dry out. The family observed multiple small electrical fires at water damaged outlets before the landlord finally replaced them. Despite bubbling walls, an increase in pests, and the appearance of suspected mold, the landlord dismissed the families concerns about lasting water damage and did not make any repairs to impacted walls or floors.

Dealing with unsafe and unhealthy housing conditions takes a lot of time and effort from families. They must repeatedly report their concerns to their landlord, even when they go unanswered, and often spend their own money trying to remedy issues like pests and poor air quality. If they do get a response from their landlord or escalate the issues to the Department of Buildings (DOB), they need to coordinate timings for inspections and repairs, which often require being present at the unit. Sometimes, the required repairs are so intensive that a family has to temporarily relocate to another unit, moving their necessities back and forth. When conditions exacerbate a health condition, like a child's asthma, the family will likely have more visits to doctors and even the

emergency room, which can be disruptive to school and work schedules. It is understandably difficult for parents to make progress on their educational and career goals when they are constantly trying to address circumstances beyond their control that are threatening their children's well-being.

Children's Law Center has raised the systemic issue of unsafe and unhealthy conditions in units subsidized through Rapid Re-Housing to DHS and the Council for years.¹⁹ We were hopeful when DHS changed its vendor for Rapid Re-Housing inspections in the fall of 2022 that DHS would take steps toward requiring Rapid Re-Housing landlords to maintain habitable and code-compliant housing.²⁰ However, we have seen no material improvement in the conditions our clients in Rapid Re-Housing are living with. We therefore encourage the Committee to ask DHS 1) for details on the process for inspecting units before leasing them to families in Rapid Re-Housing and how it is overseeing the quality of inspections conducted by its contractor, Greater Washington Urban League and 2) to develop a written, actionable plan of steps the agency will take in the next year to ensure Rapid Re-Housing participants live in safe, habitable rental housing. At a minimum, DHS should not authorize new Rapid Re-Housing leases with landlords who have a history of serious housing code violations until that record improves. DHS cannot continue providing steady income to landlords who flout DC laws and fail to provide safe and healthy housing to DC residents.

Council Must Require Transparency on Outcomes for Families Exited from Rapid Re-Housing to Inform Necessary Changes

Under its current design and operation, DHS's Rapid Re-Housing program does not work to transition most families placed in it to long-term housing stability. Families who do not receive a permanent housing voucher during their limited time in Rapid Re-Housing are not in a position to take over market rent payments when their assistance is cut off and exit Rapid Re-Housing back on a path toward homelessness. In Children's Law Center's experience, it is not uncommon for these families be evicted from the unit they were renting through Rapid Re-Housing, try to stay with family or friends for a few months, and eventually return to the District's homeless system only to be placed Rapid Re-Housing again. That is not an efficient use of District resources and puts families through a cycle of instability that is especially harmful to children. It also leads to crises like the potential mass exit of over 2,000 families from Rapid Re-Housing in just a few months that DHS announced during the FY25 budget process, acknowledging that without vouchers most of those families would not be able to maintain housing in DC.²¹ Despite years of participants, housing advocates, and the Council raising concerns about Rapid Re-Housing to DHS, the agency has not made changes to meaningfully improve outcomes for families.

DC families need the Council to legislatively reform Rapid Re-Housing to better meet their needs. To that end, Children's Law Center was grateful to see the Rapid Re-Housing Reform Amendment Act re-introduced early in the new Council period.²²

Children’s Law Center has supported this legislation since its original introduction in 2022.²³ We believe the bill would make four key reforms to the program that would improve the experiences and outcomes of our clients in Rapid Re-Housing:

- 1) End arbitrary time limits so Rapid Re-Housing participants cannot be cut off from assistance until the program has successfully:
 - a) increased their household income enough to afford market rent; or
 - b) connected them to a long-term housing subsidy;
- 2) Ensure participants’ rent payments do not exceed 30% of their household income;
- 3) Make participation in case management services voluntary – which is more effective and cost-efficient; and
- 4) Require the timely and transparent assessment of Rapid Re-Housing participants for long-term housing subsidy eligibility.²⁴

The Rapid Re-Housing Reform Amendment Act has not yet received an official Fiscal Impact Statement (FIS) to assess its costs. To prepare an accurate FIS, Children’s Law Center believes the Office of the Chief Financial Officer (OCFO) will need to consider a metric that DHS does not reliably report: how many of the families that enter Rapid Re-Housing each year have been in the program before. Assessing the true cost of keeping families in Rapid Re-Housing longer than 12 to 18 months depends on how many families currently exit Rapid Re-Housing only to reenter again, how soon after exiting Rapid Re-Housing they reenter it, and whether they returned to Rapid Re-Housing via shelter or Homelessness Prevention Program (HPP). The way DHS currently collects and reports on this data is not consistent or clear enough to accurately answer these questions.

For example, in its pre-hearing responses, DHS reported the number of families “entering *shelter* in FY24 . . . who had previously exited *shelter* in the District” within the past 6 to 24 months.²⁵ An equivalent metric was not reported for families entering Rapid Re-Housing. In its FY25 Performance Plan, DHS indicated that it was tracking “families exiting FRSP to permanent housing [who] do not reexperience homelessness within in 6-12 months.”²⁶ That appears to only capture families that exit to “permanent housing,” which is a small number of families and the ones that are least likely to return to homelessness. It also does not account for families that reexperience homelessness over a year after their exit from Rapid Re-Housing or families that do not reexperience homelessness because they are placed back in Rapid Re-Housing through HPP, both of which are circumstances in which Children’s Law Center’s clients have reentered Rapid Re-Housing for a second or third time.

To address these data gaps and fully understand the population utilizing Rapid Re-Housing, the Committee should request the following information from DHS for as many previous fiscal years as data is available: the number and percentage of families that entered Rapid Re-Housing who had previously exited Rapid Re-Housing within the past 6, 12, 18, 24, 30, and 36 months broken down by entrance via shelter or HPP. It is Children’s Law Center’s understanding that DHS should be able to track and retrieve this information via the Homeless Management Information System (HMIS), the database that DHS and service providers use to track client level data for use of homeless

services, including Rapid Re-Housing, in the District.²⁷ This data will be critical to ensure there is an accurate FIS for the Rapid Re-Housing Reform Amendment Act moving forward and ground the discussion around reforms to Rapid Re-Housing in evidence of how the program currently functions.

Career MAP May Be an Effective Alternative to Rapid Re-Housing, But More Details Are Needed to Understand How the Pilot is Working for Families

In 2022, DHS and The Lab @ DC (The Lab) began piloting a new temporary rental assistance program for families, the Career Mobility Action Plan (Career MAP).²⁸ Career MAP was designed based on input from families in Rapid Re-Housing and is intended to explore a new approach for connecting families experiencing or at risk of homelessness with long-term housing stability.²⁹ The goal of Career MAP is to “support households [with guaranteed housing and income stability] as their head of household pursues education or training to enable them to access higher paying jobs and earn more income.”³⁰ Where Rapid Re-Housing is designed as a 12-to-18-month program, families can participate in Career MAP for up to five years.³¹ Families in Career MAP receive the same level of rental assistance as Rapid Re-Housing – paying no more than 30% of their household income toward rent – and it is paired with individualized career coaching, two-generational case management for the whole family, and up to \$10,000 per year as reimbursement for any benefits lost due to an increase in earned income.³² Children’s Law Center is excited about the possibilities of this new program for families like our clients who regularly find that Rapid Re-Housing does not give them enough financial

stability or meaningful career advancement support to achieve the kind of change in earning potential needed to independently afford market rent in DC.

The five-year Career MAP pilot, which began with 600 families and currently has 511 families enrolled, is scheduled to run through September 2027 so participants are almost halfway through their time in the program.³³ According to DHS's pre-hearing responses, "Career MAP is being rigorously evaluated in partnership with The Lab @ DC using a randomized control trial that draws on a control group from the FY22 application and enrollment lottery."³⁴ While the final analysis of the pilot will not be completed until 2029, DHS and The Lab are reportedly "conduct[ing] periodic interim analyses" throughout the pilot.³⁵ In its pre-hearing responses DHS indicated that it is "tracking shorter-term outcomes for enrolled families that include receipt of Career MAP benefits, . . . employment, participant progress towards career goals, and participant engagement with the program" and will use this information "in considering future program expansion and/or adjustments to other DHS programs."³⁶ However, DHS did not provide any details on shorter-term outcomes it has been measuring or the substance of lessons learned from Career MAP administration so far.

Children's Law Center looks forward to the thorough analysis the Lab has planned to assess Career MAP's efficacy. In the meantime, we believe DHS should provide the Committee and stakeholders with more information on program implementation and family experiences in the first two years of Career MAP including the number of

participants enrolled in an education or career training program, the participants employed in full or part-time work, and the level of communication between participants and navigators. The Committee should work with DHS to maintain an ongoing dialogue of key lessons learned from Career MAP – such as main barriers to future family success in the program and program features that have been most useful for families – and how those lessons could be applied now to improve existing DHS programs like Rapid Re-Housing.

DHS Must Continue Improving the Transparency and Efficiency of the Voucher Administration Process to Connect Families with Existing Resources for Stable Housing

Evidence shows that permanent housing vouchers – which provide long-term, deep rental subsidies – are a particularly effective tool for alleviating housing insecurity.³⁷ DHS operates two locally-funded permanent housing voucher programs, Targeted Affordable Housing (TAH) and Permanent Supportive Housing (PSH), and they are an essential resource for helping low-income families maintain stable housing in DC’s unaffordable rental market.³⁸

DHS works with the District of Columbia Housing Authority (DCHA) and contracted case management providers to connect families with stable housing through TAH and PSH vouchers. DHS is responsible for identifying families that are eligible for a local voucher (a process called “matching”), connecting them with appropriate case management services, and overseeing case management providers.³⁹ Before a family can

officially receive their voucher and use it to secure a rental unit, DCHA must also approve their eligibility for the voucher based on an application prepared by their case management provider and submitted to DCHA by DHS. Once DCHA approves the family's eligibility, they receive their voucher at a briefing with DCHA and can use the voucher to lease a private rental unit with the help of their case manager and approval from DHS and DCHA.⁴⁰ The voucher utilization process ends when a voucher holder and DCHA officially execute a lease and payment contract with the private landlord – known as “lease up” – and the voucher holder moves into the unit.⁴¹

DHS Should Increase the Transparency in Voucher Eligibility Determinations

To ensure that families eligible for a TAH or PSH voucher are connected with available vouchers and stable housing as quickly as possible, families are supposed to be assessed for voucher eligibility through the District's Coordinated Assessment and Housing Placement (CAHP) system when they first seek homeless services and periodically throughout their time in shelter and other housing assistance programs like Rapid Re-Housing.⁴² However, in Children's Law Center's experience working with families in the District's homeless and homelessness prevention system, we do not believe DHS is ensuring that families receive these timely and regular voucher eligibility assessments. Many of the families we work with are not aware that they could be eligible for a locally funded permanent housing voucher or how to request assessment because they have not received transparent information about vouchers from DHS and its

contractors. Our attorneys regularly need to contact a client's case manager to request they be assessed for a voucher or to move their voucher application forward in the process. It should not take intervention by an attorney for service providers to perform such an essential duty.

Additionally, in Children's Law Center's experience, when families are assessed for a PSH or TAH voucher, they typically do not receive any written information about the determination. District residents are entitled to appeal a "rental assistance decision or action" made by DHS or a DHS provider and DHS is supposed to notify residents of this right to appeal whenever they make such a decision or action.⁴³ However, our clients rarely know whether a determination has been made about their eligibility for a voucher and are almost never aware of their right to appeal a determination of ineligibility. It is difficult for our attorneys to help clients appeal a decision about their eligibility when there are no written notices or documentation about the eligibility determination. To Children's Law Center's knowledge, DHS does not have any standard operating procedures requiring DHS staff and service providers to take these steps or quality control measures in place to see if due process is being followed. DHS is not upholding the due process rights of residents receiving homeless services. The agency must establish clear procedures for all DHS staff and service providers to ensure that whenever a voucher eligibility determination is made, the assessed family receives written notice of

the decision, with a description of the agency's reasoning, and details about how they can appeal the decision.

While DHS Continued Decreasing the Amount of Time it Takes for Families to Utilize Vouchers in FY24, Further Improvements are Needed

In recent years, the Council funded historic increases in the number of TAH and PSH vouchers available for District residents; the local voucher program expanded by more than 100% in just two years.⁴⁴ However, both DHS and DCHA struggled to adapt and streamline their administrative processes to accommodate the additional vouchers, resulting in unreasonable delays in the voucher utilization process for many families.⁴⁵ It regularly took well over a year between when a family was matched to a voucher and leased up with it. Children's Law Center appreciates that over the past two years, thanks to DHS' efforts to scale up the local voucher utilization process through initiatives like Operation Make Movement,⁴⁶ the agency has made progress in decreasing the time between match and lease-up.⁴⁷ The average time from match to lease up for PSH and TAH vouchers decreased from 471 days in FY22 to 296 days in FY24.⁴⁸ However, as DHS acknowledges, "the process still takes too long."⁴⁹

DHS's goal is for all voucher recipients to move from match to lease up in 120 days.⁵⁰ In FY24, for families that completed the PSH and TAH voucher lease up process, the average number of days from match to lease up was 316 — 10 months and over twice as long as DHS's goal.⁵¹ Further, due to continued administrative delays, many vouchers funded by the District are not being put to use to house families. Of the 1,922 family

vouchers funded in FY22-FY24, 49% are matched but unutilized.⁵² Those are 942 District families that are currently without stable housing despite having a funded housing subsidy assigned to them. Every month that a family cannot move into a home using their voucher is a month that family is stressed by housing insecurity and likely living in unsafe and unhealthy conditions. As DHS no longer has a backlog of unmatched vouchers, in the rest of FY25 the agency must prioritize honing each step of the utilization process to move matched families into housing as quickly as possible.

Specifically, Children’s Law Center encourages the Committee to ask DHS to identify how the agency can improve each of the following steps within its responsibility in the coming year:

- Ensuring case management providers are working with voucher applicants to promptly and successfully compile application materials;
- Checking the completeness of applications before submission to DCHA;
- Communicating with DCHA, case management providers, and voucher applicants to ensure any issues with an application are promptly addressed;
- Ensuring case management providers are effectively supporting voucher recipients to find a unit and complete the lease up packet; and
- Checking the completeness of leasing packets before submission to DCHA.

It is imperative that the entire District government work together to connect more families to long-term housing security through existing resources.

DHS Should Adopt Administrative Efficiencies to Meaningfully Decrease the Time it Takes to Approve and Issue Emergency Rental Assistance Program Payments

DHS also provides one-time⁵³ rental assistance to low-income families “facing

housing emergencies” through the Emergency Rental Assistance Program (ERAP).⁵⁴ For families living on a tight budget – where an unexpected bill or decrease in wages can mean not being able to pay rent that month – ERAP is an important tool to prevent eviction. In response to claims by landlords across the District that existing ERAP policies were contributing to high rental delinquencies and drawn-out evictions,⁵⁵ in the fall of 2024 Council passed emergency and temporary legislation to reform ERAP.⁵⁶ Changes made by the legislation have been in effect for the entire FY25 ERAP cycle so far.⁵⁷ Therefore, the FY25 ERAP data that DHS shared in its pre-hearing responses is a valuable source for assessing the impact of the changes, which the Council is currently considering making permanent.⁵⁸

As Children’s Law Center testified at the hearing for the permanent ERAP bill, we believe any permanent reforms to ERAP should be focused on reducing the lengthy delays in administration that prevent the timely distribution of ERAP funds. DHS’s pre-hearing responses appear to show a decrease in ERAP processing time between FY24 and FY25 – down from an average of 136 days from submission to payment in FY24 to 63 days in FY25, so far.⁵⁹ However, the data provided is not complete enough for a meaningful assessment. process still takes longer than the standards DHS has set for itself and longer than the jurisdictions with most efficient processes. DHS opened the ERAP portal for FY25 and began accepting applications for ERAP assistance on November 20, 2024.⁶⁰ The portal closed on the same day, after receiving 2,727 applications—the number

it predicted would result in the full utilization of the funds allocated in the FY25 budget.⁶¹ As such, all the applications for FY25 so far were submitted on the same day. According to DHS's pre-hearing responses, only 413 — 15% — of ERAP applications submitted in FY25 have had made it completely through the ERAP process so far, meaning either the application was denied or ERAP funds were dispersed.⁶² Therefore, the data showing 63 days cannot reflect all FY25 ERAP applications because 100 days after submission 85% of those applications have not received either a denial or payment issuance. The Committee should request regular updates from DHS on the progress of FY25 ERAP application processing timelines to ensure it has complete and accurate information while it is working on the substance of the permanent ERAP legislation.

Additionally, given that it has been well over 60 days since the ERAP portal opened and closed for FY25 and only 15% of applications submitted have received a final decision, it is unclear why DHS believes “the current number of case managers is sufficient to claim and make a final decision on the FY25 submitted cases within 60 days.”⁶³ Children's Law Center encourages the Committee to ask DHS for the reasoning behind this assessment so the agency and Council are on the same page regarding realistic processing times with current staffing levels. It is important to accurately identify whether additional staff or other resources are indeed needed to make DHS's regulatory deadlines and internal goals.⁶⁴ Further, Children's Law Center reiterates its previous recommendations that the District should investigate technology tools and best practices

used in jurisdictions with highly efficient rental assistance programs, like Massachusetts, Illinois, and Philadelphia where final decisions are generally issued within 30 to 45 days of submission.⁶⁵ The Committee and DHS should prioritize meaningfully reducing its ERAP processing times in the rest of FY25 because efficient administration of funds will support affordable housing providers in need of financial stabilization while still protecting eligible tenants from avoidable evictions.

Conclusion

Thank you for the opportunity to testify. Children’s Law Center looks forward to working with the Committee and DHS over the coming year to improve how we meet the needs of families experiencing homelessness and housing insecurity in DC.

¹ 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/ourimpact/health/>*.

² 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>*.

³ This calculation is based on estimates from Urban Institute that 21% of households in DC are households with children and 28% of those households are housing insecure and data from the American Community Survey (ACS) that there are 321,556 households in DC (21% of 321,556 is 67,527 households with children and 28% of that is 18,907 households with children who are housing insecure). It is important to note that Urban Institute’s figures do **not** include families in shelter. See *Housing Insecurity in the District of Columbia: Results from a Representative Survey*, Claudia D. Solari et al., Urban Institute, p. 72-73 and Table D.8-9 (November 2023), https://www.urban.org/sites/default/files/2023-11/Housing%20Insecurity%20in%20the%20District%20of%20Columbia_0.pdf; QuickFacts: Washington city, District of Columbia, People: Families & Living Arrangements: Households, 2019-2023, U.S. Census Bureau, <https://www.census.gov/quickfacts/fact/table/washingtoncitydistrictofcolumbia/HSD410223> (accessed March 10, 2025) (summarizing data from the U.S. Census Bureau, American Community Survey, 5-Year Estimates, 2019-2023).

⁴ In DC, there are only 33 available and affordable (meaning a household would not spend more than 30% of its income on housing costs) rental units for every 100 extremely low-income renters (households earning 0-30% of Area Median Income). The Gap: District of Columbia, National Low Income Housing Coalition (NLIHC), <https://nlihc.org/gap/state/dc> (accessed March 10, 2025).

⁵ Department of Human Services, Family Re-Housing Stabilization Program, *available at*: <https://dhs.dc.gov/page/family-re-housing-stabilization-program%C2%A0%C2%A0>.

⁶ “The purpose of FRSP is to minimize the number of time families spend in shelters and support rapid exit back to stable housing.” *Id.*; *see also* D.C. Mun. Regs. tit. 29, § 7800 (2016) (The purpose of [Rapid Re-Housing] is to support District residents who are experiencing homelessness or at imminent risk of experiencing homelessness to **achieve stability in permanent housing**. (emphasis added)).

⁷ This family has been in Rapid Re-Housing for longer than 18 months because DC paused time-limit exits during the pandemic and only resumed regular time-limit exits beginning in the spring of 2024.

⁸ A history of eviction makes it harder for families to rent and pushes families into units that are in worse conditions. *See* Matthew Desmond, *Evicted: Poverty and Profit in an American City*, p. 297 (2016).

⁹ 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>.

¹⁰ *Id.* *See also* FY24 DHS Budget, Table JA0-4, p. E-69. (In FY24 the District budgeted \$73M for Rapid Rehousing – Families (RRH-F) and \$51M for Permanent Supportive Housing – Families).

¹¹ Morgan Baskin, *Growing Share of D.C. Renters Spend At Least Half of Their Income on Rent*, DCist, September 19, 2023, *available at*: <https://dcist.com/story/23/09/19/dc-residents-income-rent/>; Sydney Lake, *Million-dollar homes are swallowing D.C.’s housing market as a whopping 20% of listings are out of reach for most people*, *Fortune*, February 24, 2024, *available at*: <https://fortune.com/2024/02/24/washington-dc-unaffordable-housing-market/>. *See also* Cunningham, Mary, et. al., *Rapid Re-housing*, Urban Institute, June 2015, p. 4, *available at*: <https://www.urban.org/sites/default/files/publication/54201/2000265-Rapid-Re-housing-What-the-Research-Says.pdf>. (In 2020, almost a third of households were considered cost burdened, defined as households devoting more than 30 percent of their incomes toward housing.).

¹² Department of Human Services 2025 Performance Oversight Responses, response to Q109(f), *available at*: <https://lims.dccouncil.gov/Hearings/hearings/707> [hereinafter DHS 2025 Performance Oversight Responses].

¹³ Out of Reach 2024: District of Columbia, National Low Income Housing Coalition (NLIHC) (2024), *available at*: https://nlihc.org/sites/default/files/oor/2024_OOR-dc.pdf.

¹⁴ *Id.* Based on the measurement that a family can “afford” an apartment if they are spending no more than 30% of their gross income on housing costs (rent and utilities).

¹⁵ *See* Department of Human Services 2024 Performance Oversight Responses, response to Q83(e), *available at*: <https://lims.dccouncil.gov/Hearings/hearings/239>; Department of Human Services 2023 Performance Oversight Responses, response to Q91(e), *available at*: <https://dccouncil.gov/wp-content/uploads/2023/03/Pre-Hearing-Question-Responses-DHS-2.20.2023.pdf>.

¹⁶ DHS 2025 Performance Oversight Responses, *supra* note 12, response to Q109(d).

¹⁷ *Id.*; Department of Human Services 2024 Performance Oversight Responses, response to Q83(e), *available at*: <https://lims.dccouncil.gov/Hearings/hearings/239>; Department of Human Services 2023 Performance Oversight Responses, response to Q91(e), *available at*: <https://dccouncil.gov/wp-content/uploads/2023/03/Pre-Hearing-Question-Responses-DHS-2.20.2023.pdf>.

¹⁸ For information on Permanent Supportive Housing vouchers *see*, Department of Human Services, Permanent Supportive Housing for Individuals and Families, <https://dhs.dc.gov/page/permanent-supportive-housing-individuals-and-families-project-based-tenant-based-local-veterans>; and for more

information on Targeted Affordable Housing vouchers *see* Department of Human Services, Targeted Affordable Housing for Individuals and Families, <https://dhs.dc.gov/page/targeted-affordable-housing-individuals-and-families>.

¹⁹ *See, e.g.*, 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); Kathy Zeisel, Children’s Law Center, Testimony Before the District of Columbia Council Committee on Human Services (March 1, 2021).

²⁰ *See New Developments to the DC Family Rehousing and Stabilization Program (FRSP)*, DC Department of Human Services, available at: https://dhs.dc.gov/sites/default/files/dc/sites/dhs/page_content/attachments/FRSP%20Changes%20Website.pdf.

²¹ Testimony of DHS Director Laura Zeilinger before the Committee on Housing, Department of Human Services Budget Oversight Hearing, April 5, 2024, at approximately 10:40:00, https://dc.granicus.com/MediaPlayer.php?view_id=56&clip_id=8798; *see also* Donte Kirby, *2200 Families Must Exit Rapid Rehousing. Where Will They Go?*, Street Sense Media (June 5, 2024), <https://streetsensemedia.org/article/2200-families-must-exit-rapid-rehousing-where-will-they-go/>.

²² B26-0050, *Rapid Re-Housing Reform Amendment Act of 2025*, available at: <https://lims.dccouncil.gov/Legislation/B26-0050> (introduced January 13, 2025). For previous versions of the bill *see* B24-0893, *Rapid Re-Housing Reform Amendment Act of 2022*, available at: <https://lims.dccouncil.gov/Legislation/B24-0893>; B25-0047, *Rapid Re-Housing Reform Amendment Act of 2023*, available at: <https://lims.dccouncil.gov/Legislation/B25-0047>.

²³ *See Over 50 Organizations and Experts Demand That the DC Council Reform Rapid Re-Housing*, Washington Legal Clinic for the Homeless (April 7, 2022), <https://www.legalclinic.org/over-50-organizations-and-experts-demand-that-the-dc-council-reform-rapid-re-housing/>; Kathy Zeisel, Children’s Law Center, Testimony Before the District of Columbia Council Committee on Human Services (October 20, 2022).

²⁴ B26-0050, *Rapid Re-Housing Reform Amendment Act of 2025*, available at: <https://lims.dccouncil.gov/Legislation/B26-0050>.

²⁵ DHS 2025 Performance Oversight Responses, *supra* note 12, response to Q93.

²⁶ 5.5: *Improve Outcomes for Families Existing the Family Rehousing and Stabilization Program FRSP*, Department of Human Services FY 2025 Performance Plan, p. 15 (November 26, 2024), available at: <https://lims.dccouncil.gov/Hearings/hearings/707> (Attachment 14-15 DHS FY25 Performance Plan).

²⁷ *See Homeless Management Information System, The Community Partnership (TCP)*, <https://community-partnership.org/hmis/> (accessed March 10, 2025).

²⁸ The Lab @ DC is an applied research and design team within the Office of Budget and Performance Management that partners with DC agencies to help design, target, start up, and evaluate District programs with a resident-centered lens. About Us: Who are we?, The Lab @ DC, <https://thelabprojects.dc.gov/about-us>.

²⁹ *Can Comprehensive Support Break the Cycle of Poverty?*, The Lab @ DC, <https://thelabprojects.dc.gov/career-map>; *Mayor Bowser Launches \$24.9 Million Career MAP Pilot, Cuts Ribbon on the New Taylor Street Service Center, Department of Human Services* (September 19, 2022), https://dhs.dc.gov/release/mayor-bowser-launches-24-million-career-map-pilot-cuts-ribbon-new-taylor-street-service?utm_source=chatgpt.com.

³⁰ Ren Massari et al., *Career MAP: Long-term effects on families of career and family supports, guaranteed housing, and benefit cliff-abatement: Pre-Analysis Plan*, The Lab @ DC, p. 7 (December 2023), available at: <https://osf.io/yxktj> [hereinafter Career MAP Pre-Analysis Plan].

³¹ Career MAP was designed to address, among other things, that FRSP families reported their rental assistance “cuts off long before it is possible to gain the education and experience needed to enter the

middle class.” *Can Comprehensive Support Break the Cycle of Poverty?*, The Lab @ DC, <https://thelabprojects.dc.gov/career-map>;

³² Department of Human Services, Career MAP, https://dhs.dc.gov/page/career-map?utm_source=chatgpt.com.

³³ Career MAP Pre-Analysis Plan, *supra* note 30, p. 16, Figure 4; DHS 2025 Performance Oversight Responses, *supra* note 12, response to Q125(b).

³⁴ DHS 2025 Performance Oversight Responses, *supra* note 12, response to Q125(g).

³⁵ Career MAP Pre-Analysis Plan, *supra* note 30, p. 16; *see also*, DHS 2025 Performance Oversight Responses, *supra* note 12, response to Q125(g).

³⁶ DHS 2025 Performance Oversight Responses, *supra* note 12, response to Q125(g) and (k).

³⁷ 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. *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.

³⁸ Department of Human Services, *A Path to Ending Chronic Homelessness in DC*, Overview, available at: <https://storymaps.arcgis.com/stories/993e532a43bd4af3a2bf1b69d54dc704> (accessed March 10, 2025).

³⁹ *Id.* at Voucher Process.

⁴⁰ *Id.*

⁴¹ For a description of the “lease-up process,” *see* District of Columbia Housing Authority, Request for Tenancy Approval Packet, Revised September 26, 2023, <https://www.dchousing.org/wordpress/wp-content/uploads/2023/09/rfta.pdf>.

⁴² FY2022 Department of Human Services Performance Oversight Responses, response to Q52, available at: <https://dccouncil.gov/wp-content/uploads/2023/03/Pre-Hearing-Question-Responses-DHS-2.20.2023.pdf>.

⁴³ D.C. Code § 4–210.01. Right to hearing; notification of right.

⁴⁴ FY24 DHS Budget, District’s Approved Budget, Enhance, p. E-76; FY23 DHS Budget, District’s Approved Budget, Enhance, p. E-82 and E-83. *See also* Marlene Berlin, *From zero to 7,000+: One DC agency charts voucher renters in its programs since 2016*, *Forest Hills CONNECTIONS*, June 13, 2023, available at: <https://www.foresthillsconnection.com/home-front/from-0-to-7000-one-dc-agency-charts-voucher-renters-in-its-programs-since-2016/>; FY2022 Department of Human Services Performance Oversight Responses, response to Q80, available at: <https://dccouncil.gov/wp-content/uploads/2023/03/Pre-Hearing-Question-Responses-DHS-2.20.2023.pdf>.

⁴⁵ Department of Human Services, *A Path to Ending Chronic Homelessness in DC: Voucher Process*, Average number of days between case management assignment and lease up, available at: <https://storymaps.arcgis.com/stories/993e532a43bd4af3a2bf1b69d54dc704>; FY2022 Department of Human Services Performance Oversight Responses, response to Q80, available at: <https://dccouncil.gov/wp-content/uploads/2023/03/Pre-Hearing-Question-Responses-DHS-2.20.2023.pdf>; Meagan Flynn and Marissa J. Lang, *D.C. residents face long housing aid delays as 3,100 vouchers sit unused*, *The Washington Post*,

October 8, 2023, available at: <https://www.washingtonpost.com/dc-md-va/2023/10/08/dc-housing-voucher-delays/>; Annemarie Cuccia, *D.C. Funded A Record Number Of Housing Vouchers, But Still Struggles to Efficiently Use Them*, DCist, August 30, 2023, available at: <https://dcist.com/story/23/08/30/dc-housing-voucher-authority-assistance-2023/>.

⁴⁶ Operation Make Movement is a new initiative implemented by DHS beginning in February 2023 to “create more capacity to support residents” through the voucher process. For the initiative, DHS “trained 30+ case managers . . . to complete the voucher application . . . [which] enabled residents to complete their voucher application earlier in the process . . . so that they could more quickly start their housing search.” DHS credits Operation Make Movement with playing a significant role in over 600 voucher applications submitted to DCHA between February 2023 and December 2023. FY2023 Department of Human Services Performance Oversight Pre-Hearing Responses, response to Q8, available at: <https://lims.dccouncil.gov/Hearings/hearings/239>.

⁴⁷ The average length of time it took recipients to lease up with almost all types of locally funded vouchers decreased markedly each year from FY22 to FY24. See Department of Human Services, *A Path to Ending Chronic Homelessness in DC*, Voucher Process, available at: <https://storymaps.arcgis.com/stories/993e532a43bd4af3a2bf1b69d54dc704> (accessed March 10, 2025).

⁴⁸ *Id.*

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² Department of Human Services, *A Path to Ending Chronic Homelessness in DC*, Tracking Progress: Tracking progress of FY22 – FY24 voucher utilization, available at: <https://storymaps.arcgis.com/stories/993e532a43bd4af3a2bf1b69d54dc704> (accessed March 10, 2025).

⁵³ Residents can apply for and receive ERAP once within a 12-month period. ERAP: Frequently Asked Questions, Department of Human Services, <https://erap.dhs.dc.gov/FAQs> (accessed March 10, 2025).

⁵⁴ Emergency Rental Assistance Program (ERAP), Department of Human Services, <https://erap.dhs.dc.gov/About> (accessed March 10, 2025).

⁵⁵ See Letter from the Office of Chairman Phil Mendelson for B25-0994, *Emergency Rental Assistance Reform Amendment Act of 2024*, (2024), available at: <https://lims.dccouncil.gov/downloads/LIMS/56343/Introduction/B25-0994-Introduction.pdf?Id=199201> (citing Jon Banister, *The Whole Industry Could Collapse’: D.C.’s Housing Providers Face An Existential Crisis*, BISNOW, (Sept. 5, 2024), available at: <https://www.bisnow.com/washington-dc/news/multifamily/the-whole-industry-could-collapse-dcs-housing-providers-face-an-existential-crisis-125782>).

⁵⁶ B25-0968, *Emergency Rental Assistance Reform Emergency Amendment Act of 2024*, <https://lims.dccouncil.gov/Legislation/B25-0968> (effective from October 18, 2024 to January 16, 2025); B25-0969, *Emergency Rental Assistance Reform Temporary Amendment of 2024*, <https://lims.dccouncil.gov/Legislation/B25-0969> (effective from December 17, 2024 to July 30, 2025).

⁵⁷ For FY25, the ERAP portal opened and closed on the same day, November 20, 2024. Department of Human Services, Emergency Rental Assistance Program: Notice of Closing of Emergency Rental Assistance Program (ERAP) Application Portal, <https://dhs.dc.gov/service/emergency-rental-assistance-program>.

⁵⁸ B25-0994, *Emergency Rental Assistance Reform Amendment Act of 2024*, <https://lims.dccouncil.gov/Legislation/B25-0994>; B26-0046, *Emergency Rental Assistance Reform Amendment Act of 2025*, <https://lims.dccouncil.gov/Legislation/B26-0046>.

⁵⁹ DHS 2025 Performance Oversight Responses, *supra* note 12, response to Q53.

⁶⁰ Department of Human Services, Emergency Rental Assistance Program: Notice of Closing of Emergency Rental Assistance Program (ERAP) Application Portal, <https://dhs.dc.gov/service/emergency-rental-assistance-program>.

⁶¹ *Id.* at pre-hearing response Q56.

⁶² *Id.* at pre-hearing response to Q42 and 43.

⁶³ *Id.* at pre-hearing response to Q56.

⁶⁴ DHS has 45 days to process applications per regulations.

⁶⁵ See *Apply for RAFT (emergency help for housing costs)*, Massachusetts housing assistance: Emergency and long-term help, available at: <https://www.mass.gov/how-to/apply-for-raft-emergency-help-for-housing-costs> (last visited Nov. 14, 2024); *The Illinois Court-Based Rental Assistance Program is open*, Illinois Housing Development Authority, available at: <https://www.illinoishousinghelp.org/cbrap> (last visited Nov. 14, 2024); *Frequently Asked Questions (FAQ): City of Philadelphia's Eviction Diversion Program*, Department of Planning and Development: City of Philadelphia, available at: <https://eviction-diversion.phila.gov/#/FAQ> (last visited Nov. 14, 2024).