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Testimony Before the District of Columbia Council  
Committee on Housing  
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Performance Oversight Hearing  
District of Columbia Housing Authority

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## **Introduction**

Good morning, Chairperson White, and members of the Committee. My name is Makenna Osborn. I am a Senior Policy Attorney at Children's Law Center and a tenant in 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 today regarding the performance of the District of Columbia Housing Authority (DCHA). Each year Children's Law Center works with hundreds of families who are seeking a safe, healthy, and stable place to call home but cannot afford market rent in DC.<sup>1</sup> DCHA's core mission is to provide quality affordable housing options these families and other District residents with low and extremely low incomes.<sup>2</sup> Through Children's Law Center's experience representing clients who live in public housing operated by DCHA and receive housing vouchers administered by DCHA, we do not believe the agency is fulfilling its mission. My testimony today will focus on three areas of DCHA's performance where marked

improvement is necessary for the agency to uphold its obligations to the DC residents it is supposed to serve: 1) timely and clear communication with program participants; 2) implementation of identified solutions to decrease delays in voucher administration; and 3) addressing poor conditions in public housing.

### **DCHA Regularly Fails to Maintain Timely and Clear Communication with the DC Residents in its Programs**

Children’s Law Center recognizes that some aspects of DCHA’s performance are influenced by factors outside of DCHA’s control —from decades of disinvestment in public housing by the federal government to a shortage of family-sized units in DC’s rental market. This makes it even more important for DCHA to effectively carry out the parts of its mission that are squarely within its control. To that end, maintaining standards of timely and clear communications with public housing residents, voucher applicants, and voucher holders should be a foundational priority for DCHA. However, despite repeated commitments from DCHA leadership to improve customer service and communication with program participants, over the past year Children’s Law Center’s clients and staff experienced a consistent lack of responsiveness to the most basic questions and requests for assistance from DCHA staff.<sup>3</sup> Just recently, it took one of our attorneys three contact attempts over 10 days just to get someone from DCHA to simply acknowledge receipt of a request for a hearing on a notice of termination. Another family we worked with noticed that their HCVP rent payments from DCHA were going to the wrong landlord after a transfer. Our client and Children’s Law Center staff contacted

DCHA repeatedly over four months —including going in person to a customer service center— while the inquiry was passed off between at least six different DCHA staff members before DCHA made any movement to correct the issue.

To address this persistent problem in DCHA’s performance, Children’s Law Center recommends that over the next year DCHA prioritizes improving 1) staff responsiveness to direct requests and 2) the timeliness and clarity of program wide policy changes or actions.

*DCHA Must Ensure Staff Are Reliably Responsive to Individual Program Participants and Their Representatives*

Regarding customer service to individual program participants, in the pre-hearing responses submitted to the Committee, DCHA highlighted decreases in its call center wait times last year. The average call center wait time decreased from 66 minutes in 2024 to 15 minutes in 2025.<sup>4</sup> That is certainly a notable and appreciated improvement. However, the call center is only one source of contact between individual program participants and DCHA. Where our clients and staff often report problems is in email or in person communications. Notably, DCHA directs HCVP applicants and participants to contact their assigned housing program specialist for any questions specific to their situation —everything from lease up to transfers to recertification.<sup>5</sup> However, in Children’s Law Center’s experience, families in the HCVP program regularly have questions to their housing specialist via email or phone go unanswered and when

families send paperwork directly to their housing specialist as requested, it is not reliably uploaded to DCHA's systems.

These failures in communication and administration have serious impacts for families and children in DC. For example, last summer a family in HCVP with several young children was referred to Children's Law Center when their air conditioning stopped working and the excessive indoor air temperatures were impacting the children's health, exacerbating asthma and causing frequent nose bleeds. In addition to the broken HVAC, their electrical circuit is broken, the stove is broken, and there is water intrusion and suspected mold growth throughout the home. After months of living in these conditions and struggling to contact their assigned housing specialist for assistance because the specialist changed multiple times without notification, the family was finally approved by DCHA for an emergency transfer only to be told they could not move forward with it because their most recent recertification documents were missing. Our client had previously submitted all the required paperwork for recertification and was not notified there was an issue until she was seeking to transfer. She has since had to refile the same documents two more times. In the meantime, during the recent cold spell in DC, the family's heat stopped working and the family was once again forced to live in extreme temperatures. Due to the repeated mismanagement of paperwork and lack of proactive communication by DCHA, this family remains stuck in an unsafe unit despite being approved for a transfer.

These problems are not unique to Children’s Law Center. We regularly speak with other legal service providers struggling to get a response from DCHA to what should be a routine request. If these are the experiences of our attorneys and clients, imagine how difficult it is for unrepresented tenants to get timely and appropriate assistance. DCHA must do better for District residents. The Committee should ask DCHA for details on what expectations it has set for housing specialists and other program staff that receive direct communications from program participants to acknowledge receipt and substantively respond to requests for assistance via email or phone; protocols for maintaining materials submitted by program participants via email or in person; and how DCHA will improve accountability to these standards in the next year.

*DCHA Must Improve the Timeliness and Clarity of its Communications to Program Participants and the Public*

In addition to responsiveness to individual communications, DCHA must focus on improving the timeliness and clarity of its program wide communications. When DCHA releases rushed announcements about program wide policy changes and actions, it can spread misinformation and cause unnecessary confusion. For example, in January 2026, DCHA announced that it would no longer offer security deposit assistance to voucher holders 1) on the day the change became effective —no advanced notice to give residents time to adjust their expectations and identify alternative means; and 2) stated that the policy change applies to both federal and local vouchers, despite DHS staff and

providers believing they still have an agreement with DCHA to pay security deposits for local vouchers.

Second, on February 12<sup>th</sup>, DCHA sent a letter to all property managers responsible for public housing units in DC requesting citizenship and immigration eligibility information on their public housing residents.<sup>6</sup> Because the request became public knowledge via a local reporter's social media and contained an extremely tight deadline of less than a week, it understandably caused stress and confusion among families in public housing about what was being requested of residents. If DCHA had been more proactive in its communications and precise in its language, public housing residents and advocates could have assessed the request and prepared appropriately. Given local budget pressures and changing policies at the federal level, it is likely that there will be an increased need for program wide changes and announcements in the foreseeable future. The Committee should ask DCHA how it plans to communicate those changes in a timely, clear manner.

### **Ongoing Oversight and Comprehensive Data Are Needed to Meaningfully Increase the Efficiency of DCHA's Voucher Administration Process**

In the fall of 2025, this Committee, in partnership with the Committee on Human Services held a roundtable on the persistent "bottleneck" in DCHA and DHS's voucher administration process with the stated goal of "identify[ing] concrete solutions to ensure that [vouchers] are reaching residents in need efficiently and equitably."<sup>7</sup> While the roundtable was focused specifically on local vouchers, many of the issues identified in

relation to DCHA's processes apply to federally-funded HCVP vouchers as well. As Children's Law Center testified at the roundtable, in our recent experience, pervasive administrative delays and poor communication by DCHA continue to prevent eligible families from securing safe and stable housing with a voucher.<sup>8</sup> While the voucher administration shared by DCHA in its pre-hearing responses is concerningly limited, see below, the data that was shared aligns with the experiences of our clients in Fiscal Year 2025 and Fiscal Year 2026, to date. In response to the Committee's specific question about 126 new local tenant-based vouchers funded in the Fiscal Year 2025 budget, DCHA indicated that only 64 families are leased up with one of those vouchers.<sup>9</sup> That means well over a year after the vouchers became available to use (October 1, 2024), 62 families have still not leased up with the housing resources the Council funded specifically for them and instead remain in limbo and likely harmful housing conditions.<sup>10</sup>

Throughout the fall 2025 roundtable, the Committees had productive discussions with public witnesses and agency leadership about the importance of DCHA holding staff to timely communication standards, adopting resident-facing portal technology, and maintaining detailed and transparent performance data in order to decrease delays wherever possible.<sup>11</sup> As it has now been over three months since the voucher bottleneck roundtable, this performance oversight hearing is an excellent opportunity for the Committee to assess what DCHA is doing to implement identified solutions. Unfortunately, DCHA's pre-hearing responses do not include detailed, reasoned

explanations of the steps the agency has taken or plans to take in the rest of Fiscal Year 2026 to increase efficiency in the voucher process. For example, during the roundtable, the full implementation of the Rent Café portal as an option for federal and local voucher applicants and participants was clearly identified as a priority but the pre-hearing responses do not give a clear update on the status and expected timeline of those efforts.<sup>12</sup> Additionally, during the roundtable, Director Pettigrew stated that it is clear DCHA needs to do a better job of monitoring how long application and Request for Tenancy Approval (RFTA) packages have been at a particular stage and suggested the agency could adopt “ticklers” to prompt more proactive monitoring and communication from housing specialists but there is no discussion of this in the pre-hearing responses.<sup>13</sup> The Committee should ask DCHA for a detailed status update on all solutions identified during the roundtable and assess what support the Committee can offer to facilitate smooth coordination with DHS.

Further, notably absent from DCHA’s Performance Oversight responses is any comprehensive reporting on the voucher administrative process. Children’s Law Center does not believe the Committee can conduct meaningful oversight of DCHA and work with the agency and stakeholders to increase the efficiency of voucher administration without this data. The narrow area where DCHA *did* include detailed information on the voucher process, Family Unification Program (FUP) vouchers, illustrates why this kind of data is useful to identify areas to prioritize for improvement.

According to DCHA's pre-hearing responses, the current average time between when a FUP recipient was confirmed eligible for a voucher and had their mandatory briefing was 42 days.<sup>14</sup> Children's Law Center knows from firsthand experience representing children in foster care in DC that most youth applying for FUP vouchers need to move through the process as quickly as possible in order to secure stable housing before they age out of care. Why then is it taking nearly two months for FUP recipients to attend a mandatory briefing? At that point, DCHA has found them eligible and it is merely a matter of scheduling and conducting the briefing. Whatever is causing this scheduling delay should be identifiable and solvable. For example, if Child and Family Services Agency (CFSA) staff are having a hard time coordinating communications and scheduling between DCHA and FUP recipients, the agencies and stakeholders should be able to identify solutions. If FUP recipients are consistently rescheduling or missing briefing appointments, Children's Law Center would be happy to work with CFSA to message the importance of having a briefing as soon as possible to foster youth. If there is a backlog in scheduling briefings at DCHA, the Committee should work with DCHA to determine if additional staff or resources are needed to hold timely briefings.

Children's Law Center believes DCHA should strive to make data on such important metrics for *all* voucher types publicly available on its website but at the least, the Committee should request that DCHA provide the Committee with the following for FY22, FY23, FY24, FY 25 and FY 26, to date:

- The average time, in days, between when:
  - DCHA receives an application and assigns it to an eligibility specialist for review;
  - an eligibility specialist initiates review of an application and the application is deemed complete;
  - an application is complete and an eligibility determination is made;
  - an eligibility determination is made and an applicant receives their voucher;
  - a voucher holder receives their voucher and submits their first RFTA packet;
  - an RFTA packet is submitted and approved or rejected;
  - an RFTA packet submitted and an inspection is conducted; and
  - a unit is approved and the HAP contract is executed.

Based on DCHA's response regarding FUP vouchers and its comments at the fall roundtable, it is Children's Law Center's understanding that DCHA can access this level of data.<sup>15</sup> However, where responsive data is not available, the Committee should ask DCHA why and what, if any, support DCHA needs to collect it.

### **Conditions in DCHA's Public Housing Properties are Harmful to Residents' Health and Well-Being**

DCHA is one of the largest landlords in the District and is entrusted with providing safe, sanitary, and healthy housing to thousands of families.<sup>16</sup> Yet Children's Law Center's experience working with families that live in public housing owned and operated by DCHA consistently reflects that many DCHA residents live in unsafe and harmful conditions such as prolonged exposure to mold, persistent water intrusion, pest infestations, and structural deterioration.. These conditions are not abstract policy concerns; they have concrete and measurable impacts on children's health, development,

and overall well-being. Research and public health data consistently demonstrate the connection between substandard housing conditions and adverse pediatric health outcomes.<sup>17</sup> Exposure to mold, moisture, and pests is associated with increased asthma exacerbations, greater reliance on emergency medical care, missed school days, and long-term respiratory complications.<sup>18</sup> For many families in public housing, these hazards remain inescapable so long as DCHA is their landlord.<sup>19</sup> Unsafe housing in this context is not merely a code compliance issue; it is a children's health issue.

*DCHA is Not Maintaining Public Housing Units in Compliance with Code Standards*

Although DCHA receives significant public funding and operates pursuant to a public mission, its performance in maintaining units to basic habitability standards remains deeply concerning. DCHA properties continue to generate substantial numbers of unresolved housing code violations and open repair requests, including conditions that directly threaten residents' health and safety. By one metric, DCHA operated housing contains roughly four times as many code violations as privately operated housing.<sup>20</sup> This is not a new concern. Children's Law Center has repeatedly highlighted persistent unhealthy conditions in public housing and chronic delays in responding to residents' complaints.<sup>21</sup>

When violations persist and repairs are delayed or incomplete, residents — particularly children— absorb the consequences. Over the past year, Children's Law Center has represented numerous DCHA residents experiencing severe and prolonged

housing conditions. For example, we worked with a family in a DCHA property who spent years seeking repairs to cracks and holes throughout their unit that allowed repeated mold growth and pest infestations. Their repair requests frequently went unaddressed and when property maintenance did respond, they engaged in superficial corrections like painting over peeling paint and suspected mold and improperly patching holes. The mom was deeply worried that the mold that kept appearing and the mice and roaches she saw every day were making her children's asthma worse. We appreciate that after Children's Law Center began working with the family, DCHA engaged in the necessary repairs, but these children would not have been forced to live in hazardous conditions for so long if DCHA had responded with prompt and adequate repairs when the family first reported their concerns.

*DCHA Must Improve the Timeliness and Quality of Repairs and Adopt Stronger Preventive Maintenance Practices*

In Children's Law Center's experience, public housing residents who submit repair requests frequently experience extended delays before conditions are addressed. Even when work orders are marked complete, the underlying hazard is not always fully remediated, resulting in repeated complaints for the same issue. This cycle of delay and superficial repair undermines both resident well-being and the long-term integrity of the housing stock. Delayed repairs allow water intrusion to persist, mold growth to expand, and structural damage to worsen. Continued exposure to environmental hazards exacerbates asthma and other respiratory conditions, particularly among children. At the

same time, repeated failures to resolve conditions erode residents' confidence in the repair system and discourage timely reporting, further compounding deterioration.

Therefore, Children's Law Center was pleased to learn that after years of discussing the possibility, DCHA finally implemented the technology for public housing residents to be able to submit and track work orders via Rent Café in 2025.<sup>22</sup> We are hopeful that using Rent Café will bring much-needed transparency to the process for residents and help DCHA more reliably track work orders so they are not lost or neglected for extended periods of time. Unfortunately, the data DCHA provided in its pre-hearing responses related to work orders is not reported in a way that helps the Committee and stakeholders assess the impact of work orders via Rent Café and any other improvements DCHA has adopted in the past year. Therefore, the Committee should ask DCHA for comparative data on average work order response and completion timelines broken down by routine and emergency and nature of submission (via phone call or Rent Café). While Children's Law Center believes DCHA must improve the timeliness of its response to work orders, especially for emergency repairs, we also wish to emphasize that a maintenance system that prioritizes work order closure over durable remediation does not satisfy DCHA's obligation to provide safe housing. In addition to implementing the option for residents to submit work orders via Rent Café, DCHA must strengthen its quality assurance processes, ensure that repairs address root causes rather

than visible symptoms, and establish clearer timelines and accountability mechanisms for unresolved or recurring violations.

Moreover, addressing individual complaints alone is insufficient to correct systemic deficiencies. Hazards like mold and moisture intrusion stem from aging infrastructure, failing roofs, plumbing deficiencies, inadequate ventilation, and deferred capital improvements. These are building-wide challenges that cannot be effectively resolved through piecemeal responses.<sup>23</sup> DCHA must implement a robust preventive maintenance strategy. This includes routine inspection of core building systems, scheduled replacement of aging infrastructure, proactive moisture assessment and remediation, and data-driven identification of properties with recurring health-related conditions. Whole-building assessments and comprehensive remediation efforts are often more effective and fiscally responsible than repeated temporary repairs in individual units.<sup>24</sup>

Children's Law Center has consistently advocated for a strategic, health-centered approach to housing maintenance and enforcement. DCHA must align its practices with that framework. Public housing residents should not be required to endure hazardous conditions before comprehensive action is taken. A proactive and preventive maintenance model is essential to safeguarding residents' health and preserving the District's public housing portfolio. As we wrote in recent testimony:

Notwithstanding the District's continuing budgetary pressures, DCHA has a responsibility to ameliorate poor housing conditions and address

housing code violations in a timely fashion and should be an exemplary landlord. We therefore urge the Council to focus on this issue during oversight and ensure DCHA takes concrete steps to improve conditions in its housing. We further ask the Council to continue to invest in maintaining and improving the quality of DCHA housing, and to hold DCHA accountable for using those funds efficiently and effectively.<sup>25</sup>

## Conclusion

Thank you again and I welcome any questions. Children's Law Center looks forward to continuing to work with the Committee and DCHA to make improvements for the many District families and children that rely on public housing and vouchers to safe, healthy, and stable housing.

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<sup>1</sup> 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, including poor housing conditions. Many of these clients live in some form of subsidized housing and/or are in unsanitary or inadequate housing because they cannot afford rent in DC. See Children's Law Center, *available at: <https://childrenslawcenter.org/ourimpact/health/>*.

<sup>2</sup> District of Columbia Housing Authority, *FY23-24 Performance Oversight Pre-Hearing Questions*, response to Q1 (Feb. 19, 2024).

<sup>3</sup> See District of Columbia Housing Authority, *Three-Year Recovery Plan: The Roadmap to Restore, Rebuild, and Revitalize the District of Columbia Housing Authority* (June 3, 2024), *available at: [Three-Year Recovery Plan – District of Columbia Housing Authority](#)*; Director Keith Pettigrew Remarks during DC Council Committees on Housing and Human Services, Joint Public Oversight Roundtable (November 13, 2025), video *available at: [https://dc.granicus.com/ViewPublisher.php?view\\_id=56](https://dc.granicus.com/ViewPublisher.php?view_id=56)*.

<sup>4</sup> See District of Columbia Housing Authority, *FY2026 Performance Oversight Response to Pre-Hearing Questions*, Response to Q16, *available at: <https://dccouncil.gov/wp-content/uploads/2026/03/FY2026-DCHA-Pre-Hearing-Responses.pdf>*.

<sup>5</sup> See District of Columbia Housing Authority, *Voucher FAQs*, <https://www.dchousing.org/wordpress/vouchers/faq/>; District of Columbia Housing Authority, *Find My Housing Specialist*, <https://www.dchousing.org/wordpress/vouchers/find-my-housing-specialist/>.

<sup>6</sup> District of Columbia Housing Authority, *Compliance Requirements for HUD-Assisted Properties*, *available at: <https://www.dchousing.org/wordpress/compliance-requirements-for-hud-assisted-properties-acc-public-housing/>*; Martin Austermuhle (@maustermuhle.bsky.social), Bluesky, February 13, 2026 at 3:46 PM, <https://bsky.app/profile/maustermuhle.bsky.social/post/3mereu2dpd225>.

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<sup>7</sup> Committee on Housing and Human Services, Notice of Joint Public Oversight RoundTable, "Housing Without the Holdup: Fixing the District's Voucher Bottleneck", available at: [Housing -Roundtable - DC Council Hearings Management System](#).

<sup>8</sup> Makenna Osborn, Testimony Before the District of Columbia Council Committees on Housing and Human Services, p. (Nov. 13, 2025), available at: [Testimony: Roundtable on Fixing the District's Voucher Bottleneck - Children's Law Center](#) ("The District's current goal is for the local voucher utilization process, measured from assignment to a case manager to lease up, to take no longer than 120 days for any household. While DHS and DCHA have recently made some notable progress decreasing voucher administration timelines, lengthy delays persist and most families are still far from entering stable housing within 120 days of assignment.").

<sup>9</sup> District of Columbia Housing Authority, FY2026 Performance Oversight Response to Pre-Hearing Questions, Response to Q68, available at: <https://dccouncil.gov/wp-content/uploads/2026/03/FY2026-DCHA-Pre-Hearing-Responses.pdf>.

<sup>10</sup> *Id.* See also, Makenna Osborn, Children's Law Center, Testimony Before the District of Columbia Committee on Housing, p.1-2 (March 6, 2025), available at: <https://childrenslawcenter.org/wp-content/uploads/2025/03/DCHA-Performance-Oversight-2025-Childrens-Law-Center-Written-Testimony-03.13.2025.pdf> ("As Children's Law Center has raised in previous Performance Oversight hearings, based on the experiences of our clients we believe poor conditions in public housing properties and administrative delays in the voucher program are undermining DCHA's ability to fulfill its mission.").

<sup>11</sup> DC Council Committees on Housing and Human Services, Joint Public Oversight Roundtable (November 13, 2025), video available at: [https://dc.granicus.com/ViewPublisher.php?view\\_id=56](https://dc.granicus.com/ViewPublisher.php?view_id=56).

<sup>12</sup> See DCHA, FY2026 Performance Oversight Response to Pre-Hearing Questions, Q4 and Q29, available at: <https://dccouncil.gov/wp-content/uploads/2026/03/FY2026-DCHA-Pre-Hearing-Responses.pdf> (responses that discuss new initiatives, Rent Café, and vouchers do not include any updates on the effort to implement an adapted version of Rent Café for local vouchers).

<sup>13</sup> Director Keith Pettigrew, DC Council Committees on Housing and Human Services, Joint Public Oversight Roundtable (November 13, 2025), video available at: [https://dc.granicus.com/ViewPublisher.php?view\\_id=56](https://dc.granicus.com/ViewPublisher.php?view_id=56).

<sup>14</sup> District of Columbia Housing Authority, FY2026 Performance Oversight Response to Pre-Hearing Questions, Response Q35(f), Attachment Q35. DCHA(HY0) FY2026 POH Response to Pre-Hearing Questions, available at: <https://lims.dccouncil.gov/Hearings/hearings/2119>. Responses Q39 attachment.

<sup>15</sup> *Id.*

<sup>16</sup> DCHA is currently the landlord for over 6,800 District residents who live in its public housing properties. District of Columbia Housing Authority, FY2026 Performance Oversight Response to Pre-Hearing Questions, Response Q39(d), Attachment Q39. DCHA(HY0) FY2026 POH Response – 39 Public Housing Residents – Demographic Information, available at: <https://lims.dccouncil.gov/Hearings/hearings/2119>.

<sup>17</sup> See e.g. Emily A. Benfer & Allyson E. Gold, *There's No Place like Home: Reshaping Community Interventions and Policies to Eliminate Environmental Hazards and Improve Population Health for Low-Income and Minority Communities*, 11 HARV. L & POL'Y REV. ONLINE S1 (2017) ("The home can have a significant impact on individual health. On average, the majority of Americans spend "90 percent of their time indoors, and two-thirds of that time is spent in the home. Children spend even more time in the home and are more vulnerable to household hazards... substandard and inadequate housing can result in health problems, including infectious and chronic disease, injuries, and permanent disability.") (internal citations omitted).

<sup>18</sup> See e.g. *id.* at S7.

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<sup>19</sup> We call DCHA “inescapable” because many tenants have few, if any, alternatives available. *See e.g. Drew Knauss, Note, District of Columbia Housing Authority Reform: Low-Income Housing Problems and Reformatory Action*, 31 GEO. J. ON POVERTY L. & POL’Y 337, 341 (2024).

<sup>20</sup> *See* Patrick Cothorn, Children’s Law Center, Testimony Before the District of Columbia Council Committee on Housing, 9, (Oct. 30, 2025), *available at* <https://childrenslawcenter.org/resources/testimony-roundtable-on-raising-the-standard-for-dc-housing/> (writing:

A significant portion of DOB’s issued NOIs are at DCHA properties. As of October 26, 2025, DOB’s public dashboard shows that since FY 2018, 54,662 housing NOIs have been issued (38,972 from complaint-based inspections and 15,735 from proactive inspections). Of those, 1,127 housing violations have been issued at DCHA owned properties. That is just over two percent of all cited housing-NOIs, despite DCHA owning less than half of one percent of all multifamily housing properties in the District. This means DCHA is incurring code violations at a rate that is at least four times what would be expected merely from their number of owned properties.

(internal citations omitted).

<sup>21</sup> Sophie House, *Cracking Code Enforcement: How Cities Approach Housing Standards*, 3-4 (Aug. 2021), *available at* [https://furmancenter.org/files/Up\\_To\\_Code-How\\_Cities\\_Enforce\\_Housing\\_Standards\\_Final.pdf](https://furmancenter.org/files/Up_To_Code-How_Cities_Enforce_Housing_Standards_Final.pdf).

<sup>22</sup> *See* District of Columbia Housing Authority, FY2026 Performance Oversight Response to Pre-Hearing Questions, Response Q48(a), *available at*: <https://lims.dccouncil.gov/Hearings/hearings/2119>, (“DCHA has implemented RentCafe [sic] and beginning in March 2025, DCHA will host on-site training for PH residents to access the system for work orders, recertifications, etc.”).

<sup>23</sup>*See* Harvard Kennedy School, ASH Center for Democratic Governance and Innovation. Systematic Code Enforcement Program, (Jan. 5, 2005), *available at* <https://ash.harvard.edu/news/systematic-code-enforcement-program>.

<sup>24</sup> Harvard Kennedy School, ASH Center for Democratic Governance and Innovation. Systematic Code Enforcement Program, (Jan. 5, 2005), *available at* <https://ash.harvard.edu/news/systematic-code-enforcement-program>.

<sup>25</sup> Cothorn, n.20 at 10, *supra*.