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Testimony Before the District of Columbia Council
Committee on Human Services
February 26, 2026

Public Hearing:
Department of Human Services Performance Oversight

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Introduction

Good morning, Chairperson Frumin, 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 about the performance of the Department of Human Services (DHS). According to DHS, its mission is “to empower every District resident to reach their full potential by providing meaningful connections to work opportunities, economic assistance and supportive services.”¹ DHS programs and services are aimed at providing families with a foundation upon which they can build opportunity. Many low-income families in the District, including Children’s Law Center’s clients, have multiple touchpoints with DHS as they work to meet their children’s basic needs like housing, nutrition, and healthcare. These programs are interconnected in families’ lives, even if they are administered separately within DHS.

Today, the foundation DHS programs are supposed to provide is increasingly fragile. Federal and local policy choices and budget tightening are reducing access to income support, healthcare, food benefits, and rental assistance.² For many of the families Children’s Law Center works with, the harms from these changes are compounding and instead of building stability, families are being pushed further into crisis. While the District cannot control federal decisions, it can control how effectively it administers local programs and how intentionally it aligns them. This hearing presents an opportunity for the Council to use its oversight authority to ensure DHS is operating as part of a holistic strategy to mitigate harm to DC families amidst unprecedented challenges. That will require transparency from DHS –comprehensive data on their programs and the families they serve– and coordinated policy and budgetary choices from Council to support sustained family stability.

My testimony today will focus on three areas of DHS’s work where thoughtful, effective implementation is essential to keep DC families and children stable. First, I will assess DHS’s administration of three forms of rental assistance used by Children’s Law Center’s clients –temporary assistance via Rapid Re-Housing, DC Flex and Career Map; long-term assistance via Permanent Supportive Housing and Targeted Affordable Housing vouchers, and emergency assistance via the Emergency Rental Assistance Program– and identify areas where changes in DHS practice and priorities will help more families access lasting housing security. Second, I will outline the risks facing

District families from pending cuts to their cash assistance from Temporary Assistance for Needy Families (TANF) and the data needed from DHS to inform the best path forward. Finally, I will highlight an issue occurring between DHS and the Department of Healthcare Finance (DHCF) that is causing DC children to improperly lose their health insurance coverage.

DHS's Time-Limited and Shallow Rental Assistance Programs May Pause Housing Insecurity But Do Not Connect Families to Long-Term Stability

A core tenant of DHS's mission is to support the District's goal to "make homelessness brief, rare, and non-recurring."³ In recent years, the District has touted its progress in significantly decreasing the number of homeless families with children in DC, largely because of the homelessness intervention and prevention programs operated by DHS.⁴ However, the metrics DHS and the Executive use to measure this progress provide an incomplete picture of what families are experiencing —overemphasizing success in making homelessness "brief" at the expense of acknowledging persistent challenges in making it "rare" and "non-recurring."⁵

For years DHS's primary tool to prevent or end an episode of family homelessness has been the Family Re-Stabilization Program, more commonly known as Rapid Re-Housing.⁶ As Children's Law Center, our partners, and participant families have raised to DHS and the Council many times, and a 2025 report by the Office of the District Auditor confirmed, Rapid Re-Housing *does* quickly move families out of the shelter system but because families do not reliably or significantly grow their incomes during

their time in Rapid Re-Housing, the program fails to connect families to lasting housing stability.⁷ In our experience, families that participate in Rapid Re-Housing commonly face eviction and a return to homelessness at the end of the program and remain stuck in a cycle of acute housing insecurity for years to come.⁸

Therefore, we appreciate that in Fiscal Year 2025 DHS began intentionally decreasing its reliance on Rapid Re-Housing as a one-size-fits-all exit path for families in shelter and has made one of its new projects for Fiscal Year 2026 “redesign[ing the] family system to include additional exit pathways from shelter and [Rapid Re-Housing] to “diversify housing solutions and strengthen long-term stability for families exiting shelter.”⁹ However, we are deeply concerned that in order to implement this system “redesign” and downsize Rapid Re-Housing, DHS is 1) placing families into programs that are no better designed to meet their needs or help them achieve long-term housing security and 2) focusing on how to incentivize families to live in temporary, unstable situations or leave the District altogether while failing to realize cost savings that could be used to help those families access secure housing in their community. Over the next year, the Committee should work with DHS to identify and maximize cost savings across programs and invest those savings in the housing resources that are suitably tailored to families’ needs so more families can achieve the long-term stability DHS states it wants to strengthen.

DC Flex is At Risk of Replicating the Same Failures as Rapid Re-Housing

In support of DHS's effort to decrease its reliance on Rapid Re-Housing, in the Fiscal Year 2026 budget, the Mayor and Council funded 460 new slots in the District's Flexible Rent Subsidy Program (DC Flex) also operated by DHS.¹⁰ These slots were intended to be utilized in two ways. First, as an alternative way for families to exit shelter, instead of Rapid Re-Housing, and second, as a new step-down path from Rapid Re-Housing after recent changes in District law have made it nearly impossible for families to extend their time in Rapid Re-Housing beyond 12 months.¹¹ Under current program rules, DC Flex provides enrolled families with a "flexible shallow subsidy" of \$8,400/year for up to five years. Families how much of their annual \$8,400 in DC Flex funds to spend on rent each month (up to their total rent amount) until their yearly allotment is exhausted. DC Flex was created to offer an alternative "duration and depth of assistance" from the District's permanent rental subsidies, like Permanent Supportive Housing (PSH), and time-limited but still resource-intensive programs, like Rapid Re-Housing.¹²

Children's Law Center appreciates that DC Flex offers families steady rental assistance for multiple years — giving families more reliability than hoping to receive limited Emergency Rental Assistance (ERAP) funds and more time to meaningfully grow their income before taking on market rent than Rapid Re-Housing. We also appreciate that during a hearing on DC Flex in the fall of 2025, DHS Director Pierre stated that DHS is "targeting [DC Flex to] families who have means to afford rent but are severely rent

burdened so a big portion of their income is going toward rent.”¹³ However, we are deeply concerned that despite DHS’s intention to consider whether DC Flex will provide an appropriate level of support for a family before enrolling them, given the reality that there are almost no families in the populations eligible for DC Flex that fit DHS’s description of who the program can work for, DHS will end up using DC Flex in the same way it has Rapid Re-Housing — as a one-size-fits-all tool for exiting as many families as possible from shelter or Rapid Re-Housing and keeping point-in-time family homeless numbers low.

For example, for the past year Children’s Law Center has been working with a family transitioning out of Rapid Re-Housing that is now been enrolled in one of the new DC Flex slots. The family is theoretically a good candidate for DC Flex. The family’s rent costs are relatively low as it is just one parent and one child and during their time in Rapid Re-Housing the mother, through her own diligent efforts, periodically held full and part-time jobs at decent wages. However, as with many of the families Children’s Law Center works with, the family’s progress toward meaningful income growth was not linear and none of the mom’s jobs turned into reliable, long-term employment. Shortly after being told she was eligible for DC Flex and submitting her application materials, the mom lost both part-time jobs she was working at the time. Because of administrative delays and errors at DHS, the family had their Rapid Re-Housing rental assistance cut off before they were approved for DC Flex and ended up going almost

three months with no form of rental assistance while they had no income. The mother simply did not have the savings to support full market rent and other necessities during that period and fell behind on rent. While DC Flex can help them pay their rent moving forward, it cannot help with the rental arrears accrued during the transition from Rapid Re-Housing to DC Flex. Now this family is worried about facing an eviction and returning to homelessness despite having spent over a year in Rapid Re-Housing and being enrolled in DC Flex because the level and length of assistance the programs provided and their operation by DHS are not tailored to the realities of families trying to transition from homelessness to supporting market rent.

Even if this family had experienced a seamless transition between programs with no gap in rental assistance, they would be in a tricky position because they would have had to draw down the full amount of DC Flex assistance for at least three months and use up over half of their yearly allotment of DC Flex funds just a quarter of the way through the year.¹⁴ If DHS, the Mayor, and Council want to use DC Flex as an alternative to Rapid Re-Housing and set families up for success in the program, the Committee must work with DHS to ensure that 1) families transitioning from Rapid Re-Housing to DC Flex do not experience such problematic gaps in their rental assistance and 2) the level of assistance families receive in DC Flex is sufficient to support their housing stability so families enrolled in DC Flex are do not have to rely on additional DHS resources like ERAP or Homelessness Prevention Program (HPP) funding to prevent eviction. To that

end, we strongly encourage the Committee to confirm whether DHS still anticipates that the report assessing the DC Flex pilot to be published in April 2025 and if DHS can share a preliminary draft with the Committee to help assess the efficacy of DC Flex and any changes that should be made to the program to improve outcomes for families.

DHS Is Missing Opportunities to Maximize Cost Savings in Its Housing Programs That Could Be Invested in Assistance for More DC Families

Over the past year, DHS has adopted several troubling policies that give families short-term financial incentives to agree to less-than-ideal temporary housing situations, like doubling up with family or friends or moving out of DC away from their support network, instead of pursuing longer-term rental assistance through DHS programs.¹⁵ While we recognize that DHS is aiming to lower costs amidst District-wide budget constraints, these policies set a concerning narrative and precedent that stable housing in DC is simply not “for” some families simply because they are too poor —even if they were born and raised in DC and want to stay here in the city they call home. It is especially disappointing that DHS has suggested that it simply has to adopt these policies when the agency has failed to pursue several cost savings opportunities in other areas of its housing programs.

For example, in the Fiscal Year 2026 Budget Support Act, this Committee passed a subtitle that made case management optional for all Rapid Re-Housing participants.¹⁶ Children’s Law Center strongly supported this change because, in our experience working with families in Rapid Re-Housing, the expensive case management provided

by Rapid Re-Housing providers —over \$900/family/month on average— brings little to no benefit to families.¹⁷ Therefore, we were disappointed to see in DHS’s pre-hearing responses that the agency has not realized any cost efficiencies from making Rapid Re-Housing case management optional because 100% of families remain enrolled in case management despite the fact that numerous families have expressed that they would opt out of mandatory case management if possible.¹⁸ The Committee should work with DHS to understand why no families have opted out of Rapid Re-Housing case management. Has DHS communicated the change in policy to families in a way that they fully understand? Are families reluctant to opt out of case management because DHS simultaneously adopted a policy that only families participating in case management can apply for extensions in Rapid Re-Housing?¹⁹ If so, perhaps DHS should reconsider that policy; especially as fewer families are enrolled in the program and DHS has expanded its discretion to deny extensions such that families requesting extensions would put less financial pressure on DHS.

Additionally, according to program cost breakdowns provided in DHS’s pre-hearing responses, in the Career MAP program, case management plus other administrative costs only average \$453/family/month.²⁰ Career MAP case management is supposed to be “robust” and “two-generational” with career advising, customized income growth plans, and financial literacy such that it should have similar if not more expensive costs than Rapid Re-Housing case management.²¹ The Committee should work

with DHS to identify why Career MAP case management costs almost \$500 less per family per month than Rapid Re-Housing case management and what practices employed in Career MAP could be applied to Rapid Re-Housing to bring case management costs down. Even if every family in Rapid Re-Housing opted in to case management, if the monthly costs per family were the same as Career MAP, DHS could save at least \$4.2 million/year.²² Children’s Law Center believes it would be a much better investment for the District to put that money towards rental assistance that will keep more families in housing for longer.

Detailed Program Evaluations are Needed to Assess Whether Career MAP and a Re-Designed DC Flex Could Effectively Connect Families to Long-Term Housing Stability

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).²³ 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.²⁴ 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.”²⁵ Where Rapid Re-Housing is designed as a 12-to-18-month program, families can participate in Career MAP for up to five years. Further, unlike the much lower level of assistance available through DC Flex’s shallow subsidy, 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.²⁶ Further, Career MAP provides 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.²⁷ Children’s Law Center is excited about the possibilities of this program for families like our clients who regularly find that neither Rapid Re-Housing nor DC Flex 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 498 families enrolled, is scheduled to run through September 2027 so participants are over halfway through their time in the program.²⁸ Children’s Law Center thanks the Committee for asking DHS to provide data on Career MAP in its pre-hearing responses as there as DHS has previously shared very little details to help the Committee and interested stakeholders evaluate the program. According those pre-hearing responses, on December 31, 2025, 39% of participant heads of household in Career MAP had some kind of employment and 29% were working 30 hours or more per work with an average hourly wage for employed heads of household of \$21.08.²⁹ While these employment numbers suggest that families in Career MAP, are as predicted, being more successful at securing employment and raising their income than families in Rapid Re-Housing, they should also raise serious concerns about whether the majority of families in Career MAP will be

able to independently support market rent at the end of their time in the program in September 2027.³⁰

Children’s Law Center looks forward to the thorough analysis the Lab @ DC plans to release in the fourth quarter of Fiscal Year 2026 and we encourage the Committee to confirm DHS and the Lab @ DC are still on track for that timeline.³¹ In the meantime, we believe the Committee should exercise its oversight powers to engage in ongoing discussions with DHS about the progress of families in Career MAP, their likelihood to be prepared to independently afford market rent at the end of their time in the program, and how DHS intends to support any families who are not able to do so to ensure they do not return to homelessness.

Ongoing Oversight and Comprehensive Data Are Needed to Meaningfully Increase the Efficiency of DHS’s Voucher Administration Process

Evidence shows that permanent housing vouchers — which provide deep rental subsidies for as long as a family needs support— are a particularly effective tool for alleviating housing insecurity.³² 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.³³

Recognizing the importance of long-term vouchers to District families, in the fall of 2025, this Committee partnered with the Committee on Housing to hold a roundtable on the persistent “bottleneck” in the administration of District-funded vouchers by DHS

and its partner agency the District of Columbia Housing Authority, with the stated goal of “identify[ing] concrete solutions to ensure that [vouchers] are reaching residents in need efficiently and equitably.”³⁴ As Children’s Law Center testified at the roundtable, in our recent experience, pervasive administrative delays and poor communication at both agencies continue to prevent eligible families from securing safe and stable housing with a voucher.³⁵ The pre-hearing responses submitted by DHS illustrate the ongoing impact of these delays. According to the data provided by DHS, for families that leased up with PSH-F and TAH-F vouchers during Fiscal Year 2025, the median time it took for them to move from match to lease-up was 519 days (nearly 1.5 years) and 798 days (over 2 years) respectively.³⁶

Additionally, DHS stated that it anticipates over 600 locally-funded vouchers for families will remain underutilized at the end of Fiscal Year 2026, meaning the voucher is funded in DHS’s budget but a family is not using it to pay rent in a unit.³⁷ Those are 600 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,³⁸ in the rest of Fiscal Year 2026 the agency must prioritize honing each step of the utilization process to move matched families into housing as quickly as possible.

To help ensure DHS is continuously improving its voucher administration processes, Children’s Law Center encourages the Committee to utilize its oversight powers during this hearing and regular check-ins with the agency moving forward, to assess what DHS is doing to implement solutions identified during the fall 2025 roundtable. 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 steps DHS has taken and plans to take in the rest of Fiscal Year 2026 to increase efficiency in the voucher process. In particular, 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.

Additionally, as we did in the fall 2025 roundtable, Children’s Law Center wants to encourage the Committee to discuss how DHS can update its public-facing voucher portal to ensure the data is complete and useful.³⁹ A comprehensive level of historic and up-to-date information on the length of each step of the voucher administration process

for each type of voucher, is necessary to ensure DHS, DCHA, policymakers and other relevant stakeholders, like PSH service providers, can strategically collaborate on identifying and implementing targeted solutions. Ultimately, it is imperative that the entire District government work together to connect more families to long-term housing security through existing resources.

DHS Needs to Provide Clarity on Eligibility Requirements and Future Distribution Plans to Ensure Equitable Access to ERAP Funds

Over the past year, pursuant to the Emergency Rental Assistance Program Reform Amendment Act of 2025 passed by the Council in May 2025, DHS has implemented significant changes to the eligibility criteria for its Emergency Rental Assistance Program (ERAP).⁴⁰ Notably, the law narrowed the eligibility for ERAP to households that had experienced an emergency that was an “unforeseen or unusual event.”⁴¹ As Children’s Law Center previously voiced, we are concerned this new definition of emergency is vague and difficult to prove and will limit the ability of our clients to qualify for ERAP assistance and curtail their chances for preventing eviction and homelessness if they fall behind on rent.⁴² Councilmember Frumin, as Chair of this Committee, attempted to address this concern by ensuring that the final law retained language allowing ERAP applicants to self-attest to their emergency situation if they did not have documentation of it available.⁴³

Despite this, several community partners have reported that some DHS-contracted ERAP processors are refusing to accept self-certification of emergencies and

instead are requiring formal documentation in all cases. This practice appears inconsistent with the law and Council intent, and risks denying assistance to households who do meet the new eligibility standards but cannot immediately produce documentation of their qualifying emergency. We urge the Council to discuss this issue with DHS and establish a plan for DHS to ensure its contracted ERAP processors are permitting self-attestations where the law allows.

Separate from these eligibility implementation concerns, the way DHS rolled out ERAP in the fall of 2025 created significant and discriminatory access barriers for families seeking to apply for ERAP. As has been well-documented for this Committee, instead of opening an ERAP portal and accepting applications on a designated day as it has the past several years, DHS set a date, November 20, 2025, on which prospective applicants could contact DHS to sign up for a future appointment to apply.⁴⁴ While we appreciate that this approach was intended to avoid the chaos and technical difficulty that plagued portal openings for the past few years, it resulted in a new set of issues.⁴⁵ In the absence of clear and proactive communication from DHS, legal service providers, tenant advocates, and tenants heard rumors that only families who showed up at DHS's office in person — as opposed to those who called on the phone— would be guaranteed to receive an ERAP application appointment slot, which discouraged some families from even attempting to call. Further, until the day before November 20th, even Children's Law Center had a lack of clarity about the type of language access services that would be available to families

who have limited English proficiency in person and via phone, which may have discouraged families in need of translation services from requesting an appointment.

The fall 2025 ERAP process was not only confusing but also inaccessible for many District residents. Individuals with physical disabilities, injuries, or other mobility limitations and parents without childcare options were effectively excluded from requesting an appointment because they could not physically stand in the line at DHS for hours on end and the telephone lines were not working for most of the day. For example, one of Children’s Law Center’s clients did not get an appointment to apply for ERAP because an injury prevented her from standing in line in person, and she was unable to successfully connect with DHS by phone. The Committee should work with DHS to ensure that if more ERAP application appointments are made available in Fiscal Year 2026, DHS has a process in place for all families to have fair and equitable access to appointment slots.

Cuts to Temporary Assistance for Needy Families in Fiscal Year 2027 Will Have a Devastating Impact on Families

Temporary Assistance for Needy Families (TANF) is the District’s only cash-based assistance program in the District that supports families including Children’s Law Center clients with little or no income to help to pay for rent, utilities, diapers, clothes, transportation, and other essentials. Having available cash provides power, flexibility, and greater stability, especially during uncertain economic times. In FY24, DC had 13,7000 individual houses on TANF, which contained 25,370 individual children.⁴⁶ In

FY2025 those numbers rose significantly to 18,442 individual households utilizing TANF which contained 33,049 children.⁴⁷ An increase of over 4,700 households and almost 7,700 households relying on TANF.

The increase in the number of households relying on TANF is even more alarming when taking into consideration of the upcoming cuts to TANF. Beginning in Fiscal Year 2027, there are three steps to cuts to TANF: (1) End cost-of-living adjustments for TANF benefits; (2) Reinstigate time limits for families receiving TANF for 60 months or more; and (3) Increase sanctions for not meeting work readiness requirements.⁴⁸ These cuts are being driven by increasing budget —in part due to the increasing number of families relying on TANF. However, the cuts do nothing to investigate why more and more families are relying on TANF and address the root cause of why a family may rely on TANF for 60 months or more or have difficulty meeting work requirements.

What is clear is that these cuts will have deep and devastating impacts on families if they go through. The Department of Human Services has reported that 15,000 children —almost half the children currently on TANF will be impacted.⁴⁹ By 2028, benefits will drop to \$201/month for family of three under time limits and in the same year if a family also faces sanctions, benefits will be \$151 a month.⁵⁰ Studies show that without sufficient TANF support the District will see an increase in hunger, homelessness, absenteeism and worse school outcomes, and child neglect due to parental stress.⁵¹

The budget of both the agency and the District as a whole is not prepared to absorb the cost of these increases in poor outcomes and entries into other harmful systems like child welfare and homelessness. For example, the average annual cost of keeping a child in foster care is \$42,884 and the average annual cost of shelter for an unhoused child is \$49,700, while the maximum annual TANF benefit for a household of three is \$9,636. Moreover, given that they will have to implement these changes —including expanded hardship exemptions— while administering significant changes to SNAP and Medicaid, either admin costs will go up or program services will continue to suffer.

We, therefore, would ask this Committee and the Council to work with DHS and the budget office to assess where other expenses will arise due to these cuts and to understand how the District will be spending more money in an attempt to look like it is saving money.⁵² The District needs to assess where it is spending more on administrative costs than actually providing services.

Moreover, studies show that time limits and sanctions simply do not work to increase employment.⁵³ Time limits and sanctions do nothing to address the barriers to work that many TANF recipients experience including physical and mental health impairments, low education levels, limited English proficiency and experience with domestic violence and other trauma.

In our experience most TANF families are working but the jobs they are in are a mismatch for their need.⁵⁴ Jobs include high-turnover, low paying, or lack alignment of

realities of being a parent (like needing childcare). Instead of using DHS's time to administer time limits — which will be administratively burdensome for the agency— the agency's time would be better used to actually focus on the implementation of the TANF Training and Employment Program and more broadly meaningfully addressing barriers to work.

We appreciate that this Committee asked more extensive performance oversight questions this year so we can better understand the realities of the TANF program and its recipients.⁵⁵ For example, the performance oversight responses highlight that DHS just undertook a redesign of TEP. The redesign began in October 2024, so the agency has only had a little over a year to see the impact of this redesign on supporting participants with employment.

Ultimately, if we want to see families move off of TANF (and other subsidies) they must be connected not only with jobs that allow them to pay for necessities —rent, food, childcare, clothing, medicine, etc.— but also jobs that fit the needs of being a parent. Cutting TANF will only make it harder for families to move out of poverty as they will not have sufficient resources that actually allow them to break the cycle of poverty —like creating savings to address emergent financial constraints. DHS acknowledges the realities of the job market— “the declining employment numbers reflects accelerated Federal job cuts in the D.C. region since early 2025, outpacing national trends. Budget constraints have further reduced local hiring and impacted related sectors—hospitality,

healthcare, law, and administrative services — industries that typically employ most TEP customers.”⁵⁶ And yet the agency is still choosing to cut the vital lifeline that is TANF.

We strongly believe that any decisions regarding TANF should be data informed and not solely based on budget pressures as they currently are being proposed. So, while we appreciate the significantly more in-depth performance oversight responses this year, we were alarmed at how what DHS does not track to understand the realities of TANF recipients. The questions DHS indicated they do not track data for included:

- The number and percentage of TANF beneficiary children enrolled in the childcare subsidy program.
- The five most common causes of errors in the termination and denial, respectively, of TANF benefits and describe the steps DHS is taking to address each of those issues.
- How many individuals currently meet TANF eligibility criteria due to having no children, being pregnant, and expecting to deliver their child within four months.
- What was the District’s TANF work participation rate for each fiscal year from FY23 through FY26 to date?
- What percent were employed in permanent full-time positions upon leaving TANF?
- How many, and what percentage of TANF households who have participated in TANF for more than 60 months currently receive a DHS housing subsidy?

These questions are designed to help the agency understand first and foremost the TANF population, particularly what other subsidies they are receiving that are subject to upcoming cuts due to DC’s budget realities.⁵⁷ Additionally, these questions particularly around employment are meant to determine if TANF recipients are working and are accessing full-time employment. In our experiences, as noted above, most TANF families

work, and national data supports that —however, it would be helpful for DHS to provide DC specific data. If families are not working, it is also helpful to understand why.

Many of these data questions could be addressed in an active working group — including helping the agency understand why they are being asked and how the agency could move towards collecting this information. We are, therefore, grateful that this Committee established a working group on TANF and that DHS has begun the process for the working group.

However, we are disappointed to learn this will not be a robust process that can speak against these cuts, the lack of data, and the need to improve implementation. The working group will meet three times in the month of February —a significantly abbreviated process as compared to the 2016 working group. The first meeting starts the day before this hearing, February 25, 2026. The working group is limited in scope to address hardships exceptions to time limits.⁵⁸ We appreciate the opportunity to engage in the working group but recognize that it does not get to many of the actual concerns of implementing TANF. We would ask that DHS have a continued working group that would allow the agency in partnership with the Council and stakeholders to dive into addressing work barriers and reducing administrative burden of the TANF program. The rapid pace and narrow scope of the working group do not actually improve TANF — it is a small attempt to mitigate the deep harms the agency has proposed.

In the coming year, we ask this Committee to ensure funding through Fiscal Year 2027 at a minimum, create a more robust working group to address the barriers to employment as well as to meaningfully assess TANF implementation, outcomes, and impact. We can't collaborate with the agency on how to make TANF more effective if we have to focus on preserving the basics.

District Residents Are Losing Benefits Due to Insufficient Staffing and Technological Failures at DHS and DHCF

Children's Law Center issue where some of our clients covered by HSCSN have been improperly dropped from Medicaid coverage completely when their parent's income increases above the threshold for Social Security Income (SSI), despite the child's qualifying disability. We are also seeing this issue come up with our clients who are child welfare involved.⁵⁹ These clients have been determined to be ineligible for SSI —not because of a change in their SSI-qualified disability, but due to SSI fund mismanagement. While Health Services for Children with Special Needs (HSCSN) eligibility does not depend on actually receiving SSI benefits, we know that based on prior experiences that termination of SSI benefits results in an automatic termination of HSCSN insurance. Therefore, we remain concerned that they may lose their HSCSN coverage like our other clients have, which would have serious health consequences.

First and foremost, we want to thank HSCSN, DHCF, and DHS who have worked with us on individual cases to prevent gaps in healthcare coverage or reinstitute our clients quickly. We believe that this issue is bigger than our client community but because

of lack of transparency, accountability, and coordination we have no sense of scale of the problem, who is working on it, and what the source is so that we can adequately advise our clients. We, therefore, would like HSCSN, DHCF, and DHS to work together to address this systemic issue.

As noted, it is difficult for us to say exactly where the problem lies —is it within DHCF or DHS or both. Each agency and the health provider have different elements to own and see different sides of the problem. That is why all three need to come together to fill in the gaps and create a full picture.

We can hypothesize that in part this issue is due to an overreliance on the computer system —the District Access System (DCAS).⁶⁰ Once DCAS has identified someone has no longer receiving SSI, the system will automatically boot them from their healthcare even though they still have a qualify disability. DCAS lacks the nuance and sophistication to identify that SSI ineligibility due to finances does not equate ineligibility to receive HSCSN health services. We also speculate that part of the issue is delays in staff submitting and processing paperwork in DCAS in a timely manner to prevent automatic disenrollment.

However, we cannot emphasize enough that it has been extremely difficult to get to the root(s) of this issue. We are able to identify it is happening and through strong advocacy we are able to stop or mitigate the harm. However, we also know for many DC residents do not have an advocate that can help them navigate the very complex systems

of both SSI and healthcare. The issues of automatic disenrollment are systemic and therefore need a systemic solution.

We, however, have not been able to engage the agencies in interagency efforts to come up with a solution. No agency appears willing to own the problem, lead, and come up with solutions. We, therefore, ask this Committee to encourage HSCSN, DHCF, and DHS to come together to address this issue as well as others that may be coming up within the scope of these agencies. Solution oriented partnering through interagency coordination will provide a systemic solution for clients and DC residents to ensure consistent access to healthcare despite their income. We want to make clear that a client who no longer qualifies for SSI due to finances should not be automatically disenrolled from their healthcare.

Conclusion

Thank you for the opportunity to testify. Children’s Law Center welcomes the opportunity to work with this Committee and DHS to take a thoughtful, holistic approach to keeping District families and children stable.

¹ Department of Human Services, FY 2026 Performance Plan (November 26, 2025), p. 5, available at: <https://oca.dc.gov/sites/default/files/dc/sites/oca/FY26%20Plan%20-%20DHS.pdf>.

² See First Focus on Children, *What Proposed Federal Budget Cuts and Policy Changes Will Cost Children* (February 10, 2025), <https://firstfocus.org/resource/what-proposed-federal-budget-cuts-and-policy-changes-will-cost-children/>; New America, *The Hidden Impact of Federal Budget Cuts: What Families and States Stand to Lose* (July 1, 2025), <https://www.newamerica.org/insights/the-hidden-impact-of-federal-budget-cuts-what-families-and-states-stand-to-lose/>; Children’s Law Center, *TANF is Still a Lifeline*, <https://childrenslawcenter.org/our-impact/systemic-reform/tanf-is-still-a-lifeline/> (Mayor Bowser’s proposed local cuts to Temporary Assistance for Needy Families (TANF) in the District are scheduled to go into effect in Fiscal Year 2027).

³ Department of Human Services, FY 2026 Performance Plan (November 26, 2025), p. 5, 7-8, *available at*: <https://oca.dc.gov/sites/default/files/dc/sites/oca/FY26%20Plan%20-%20DHS.pdf>.

⁴ *See, e.g.*, 2025 Point-In-Time Results Show Decrease in Homelessness, Highlighting Continued Success of Key Services and Housing Investments (May 12, 2025), <https://dc.gov/release/2025-point-time-results-show-decrease-homelessness-highlighting-continued-success-key#gsc.tab=0>.

⁵ The data the District government uses to measure family homelessness only counts families in shelter or unsheltered as “homeless,” and considers families in the Family Re-Housing Stabilization Program (FRSP), more commonly known as Rapid Re-Housing (RRH), in “permanent housing” and not as homeless, despite the fact that RRH rental assistance is limited to only 12 months. As a result, if the District is focused on decreasing its official count of homeless families, it has an incentive to put families in RRH instead of shelter. While the District’s reported number of homeless families goes down, it often obscures a growing number of families in RRH are still deeply housing insecure. *See* Metropolitan Washington Council of Governments, Homelessness in Metropolitan Washington (May 2025), Appendix B: Homelessness Enumeration Jurisdictional Narrative Reports: District of Columbia, p. 105, 112, *available at*: <https://www.mwcog.org/documents/2025/05/14/homelessness-in-metropolitan-washington-results-and-analysis-from-the-annual-point-in-time-pit-count-of-persons-experiencing-homelessness-featured-publications-homelessness/>.

⁶ *See* Max Tipping, *Set up to Fail Rapid Re-Housing in the District of Columbia*, Washington Legal Clinic for the Homeless, May 2017, *available at*: <https://www.legalclinic.org/wp-content/uploads/2018/03/Set-up-to-fail-2nd-edition.pdf>; FY24 DHS Budget, Table JA0-4, p. E-69. (In Fiscal Year 2024, the District budgeted \$73M for Rapid Rehousing – Families (RRH-F) compared to \$51M for Permanent Supportive Housing – Families).

⁷ *See* Makenna Osborn, Children’s Law Center, Testimony Before the District of Columbia Council Committee on Human Services (March 5, 2025), p. 2-12, *available at*: <https://childrenslawcenter.org/resources/2024-25-performance-oversight-testimony-department-of-human-services/>; Kelly Hunt and Brian Churney, Income Growth in the Family Rehousing Stabilization Program, An Issue Brief by the Office of the DC Auditor (June 18, 2025), p. 3, *available at*: <https://dcauditor.org/report/income-growth-in-the-family-rehousing-stabilization-program/> (“More than 64% of participants who exited FRSP during our study period had no income growth. Fifteen percent experienced a decline in income. Only 21% experienced an increase in income.”)

⁸ *See* Makenna Osborn, Children’s Law Center, Testimony Before the District of Columbia Council Committee on Human Services (March 5, 2025), p. 2-12, *available at*: <https://childrenslawcenter.org/resources/2024-25-performance-oversight-testimony-department-of-human-services/>.

⁹ Department of Human Services FY2026 Performance Oversight Responses, response to Q16, *available at*: <https://lims.dccouncil.gov/Hearings/hearings/2104>. DHS also shared its goals to exit more families from shelter through non-RRH pathways with stakeholders at meetings of the Interagency Council on Homelessness during the summer of 2025. Slides and notes on file with Children’s Law Center.

¹⁰ Department of Human Services Fiscal Year 2026 Budget Oversight Hearing, *Pre-Hearing Questions and Responses to Council* (June 2025), response to Q23, *available at*: <https://lims.dccouncil.gov/Hearings/hearings/907>.

¹¹ *See* Department of Human Services, Responses to Pre Hearing Questions to DC Flex to Council, *available at*: <https://lims.dccouncil.gov/Hearings/hearings/1951>; Department of Human Services FY2026 Performance Oversight Responses, response to Q160, *available at*: <https://lims.dccouncil.gov/Hearings/hearings/2104> (“The agency is also leveraging DC Flex and other homeless prevention resources to provide stabilization support for families as they exit FRSP.”)

¹² Josh Leopold et al., *DC Flexible Rent Subsidy Program: Findings from the Program's First Year*, Urban Institute & The Lab @ DC (October 2020), p. vi, available at:

<https://www.huduser.gov/Portal/publications/DC-Flexible-Rent-2020.html>.

¹³ Director Rachel Pierre, Remarks During Questions From Chairperson Matt Frumin, Committee on Human Services Public Hearing on the Flexible Rent Subsidy Amendment Act (B26-0366), October 30, 2025, video available at: https://dc.granicus.com/ViewPublisher.php?view_id=11.

¹⁴ Currently, families in DC Flex receive a total of \$8,400 in rental assistance that they can pull down throughout the year. Department of Human Services FY2026 Performance Oversight Responses, response to Q42(a)(ii), available at: <https://lims.dccouncil.gov/Hearings/hearings/2104>. Even if our client had a relatively affordable one-bedroom apartment for her and her child with rent at \$1,500, if she had to draw down enough DC Flex funds to cover to cover that full rent for three months while unemployed, she would only be left with \$3,900 of rental assistance for the remaining nine months of the year ($\$1,500 \times 3 \text{ months} = \$4,500$ and $\$8,400 - \$4,500 = \$3,900$). For examples of fair market rents for one-bedroom apartments across DC, see *Monthly Income Limits & Fair Market Rent*, Department of Human Services, <https://dhs.dc.gov/page/monthly-income-limits-fair-market-rent>.

¹⁵ Over the past two years, DHS has repeatedly published Emergency and Proposed Rulemakings for the RRH program that include “Financial Incentives” for families “who meet[] program goals related to exiting the program earlier than the twelve (12) month program timeframe...” These incentives include \$1,000 to \$2,000 if a family “has moved in or is planning to move in with family or friends and has a written commitment they can live at that location for at least a year” or “has entered into a shared housing agreement where they will be able to live in the housing for at least a year paying fifty percent (50%) Rent Burden.” See Department of Human Services, *Notice of Fifth Emergency Rulemaking - Amending 29 DCMR Ch. 78 - Family Re-Housing and Stabilization Program* (February 20, 2026), Section 7811, available at: <https://www.dcregs.dc.gov/Common/DCMR/SectionList.aspx?SectionNumber=29-7800>. Additionally, in 2025, DHS introduced a new aspect of its Homelessness Prevention Program, titled HPP+, that can provide “partial rental assistance for up to six (6) months [. . . for] assistance for clients relocating outside the District.” Department of Human Services FY2026 Performance Oversight Responses, response to Q82, available at: <https://lims.dccouncil.gov/Hearings/hearings/2104>

¹⁶ D.C. Act 26-148, Fiscal Year 2026 Budget Support Act of 2025, Subtitle K. Rapid Rehousing Programs, available at: <https://lims.dccouncil.gov/Legislation/B26-0265>.

¹⁷ See Committee on Human Services, Fiscal Year 2026 Committee Budget Report (June 21, 2025), Recommendations for New Subtitles: Rapid Re-Housing Case Management Efficiency, p. 67, available at: <https://www.dccouncilbudget.com/fy-2026-budget>. Note that this Committee initially proposed explicitly prohibiting participation in RRH case management services for families enrolled in TANF’s TEP case management, which would have resulted in definite savings, but the final subtitle passed by the full Council did not go as far.

¹⁸ Department of Human Services FY2026 Performance Oversight Responses, response to Q68, available at: <https://lims.dccouncil.gov/Hearings/hearings/2104>.

¹⁹ See Department of Human Services, *Notice of Fifth Emergency Rulemaking - Amending 29 DCMR Ch. 78 - Family Re-Housing and Stabilization Program* (February 20, 2026), Section 7810.3, available at:

<https://www.dcregs.dc.gov/Common/DCMR/SectionList.aspx?SectionNumber=29-7800> (“DHS cannot evaluate an FRSP participant’s good-faith efforts toward the achievement of goals set forth in an individualized plan if the participant did not request, or opts out of, case management services. Accordingly, an FRSP participant who has not requested case management services, or who has opted out of case management services, will not be eligible for an extension of the twelve (12)-month FRSP assistance period.”).

²⁰ Department of Human Services FY2026 Performance Oversight Responses, response to Q46, available at: <https://lims.dccouncil.gov/Hearings/hearings/2104>.

²¹ Career MAP, Department of Human Services, <https://dhs.dc.gov/am/node/1605181>.

²² DHS has stated that it intends to have 700 families in RRH by the end of Fiscal Year 2026 and keep program capacity around that number moving forward. DHS remarks to the Interagency Council on Homelessness Family System Working Group, Notes on File with Children’s Law Center. Savings of approximately \$500/family on case management costs across a year for 700 families adds up to savings of approximately \$4,200,000 overall (\$500/family/month x 12 months x 700 families = \$4.2 million).

²³ 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>.

²⁴ *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.

²⁵ 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>.

²⁶ 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>;

²⁷ Department of Human Services, Career MAP, https://dhs.dc.gov/page/career-map?utm_source=chatgpt.com.

²⁸ 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. 15, Figure 4 (December 2023), available at: <https://osf.io/yxktj>.

²⁹ Department of Human Services FY2026 Performance Oversight Responses, response to Q117, available at: <https://lims.dccouncil.gov/Hearings/hearings/2104>.

³⁰ If a family is working 30 hours per week at a wage of \$21.08/hour, their monthly income would be approximately \$2,530 ((30 x \$21.08) x 4), which is still well below the monthly income needed to independently support fair market rent in DC. See *Out of Reach: District of Columbia*, National Low Income Housing Coalition, <https://nlihc.org/oor/state/dc> (Estimates that a household would need to earn at least \$44.50 / hour in a full time job to support the \$2,314 fair market rent for a two-bedroom apartment in DC).

³¹ Department of Human Services FY2026 Performance Oversight Responses, response to Q121, available at: <https://lims.dccouncil.gov/Hearings/hearings/2104>.

³² 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.

³³ 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).

³⁴ 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](#).

³⁵ Makenna Osborn, Children's Law Center, 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.").

³⁶ Department of Human Services FY2026 Performance Oversight Responses, response to Q131, available at: <https://lims.dccouncil.gov/Hearings/hearings/2104>.

³⁷ *Id.* at response to Q132.

³⁸ According to DHS's pre-hearing responses, the only unmatched vouchers the agency had as of February 2026 is 198 PSH-F vouchers (which includes the 160 TAH-F vouchers newly funded in the Fiscal Year 2026 budget that DHS converted to PSH-F vouchers to facilitate step downs from PSH to TAH) and the agency has a schedule for how it will match those vouchers throughout the rest of Fiscal Year 2026 that we are confident it will adhere to based on need and capacity. *Id.* at response to Q125 and Q126.

³⁹ Makenna Osborn, Children's Law Center, Testimony Before the District of Columbia Council Committees on Housing and Human Services, p. (Nov. 13, 2025), p. 11-14, available at: [Testimony: Roundtable on Fixing the District's Voucher Bottleneck - Children's Law Center](#).

⁴⁰ See D.C. Act 26-74, Emergency Rental Assistance Program Reform Amendment Act of 2025, available at: <https://lims.dccouncil.gov/Legislation/B26-0046>.

⁴¹ *Id.* at Section 2(b).

⁴² Makenna Osborn, Children's Law Center, Testimony Before the District of Columbia Council Committee on Housing, Public Hearing on the Emergency Rental Assistance Reform Amendment Act of 2024 (November 15, 2024), p. 11-12, available at: <https://childrenslawcenter.org/resources/testimony-emergency-rental-assistance-reform-amendment-act-of-2024/> ("Children's Law Center believes this [] standard is vague and will be difficult to administer in practice, which means there is a risk it will be applied inconsistently across ERAP processors and subjectively by individual case managers.").

⁴³ See Committee on Human Services, Committee Report on Bill 26-0046 the Emergency Rental Assistance Amendment Act of 2025 (March 25, 2025), p. 16-17, available at: <https://lims.dccouncil.gov/Legislation/B26-0046> ("[S]elf-certification is limited to those circumstances in which it is not possible to document the nature of an emergency situation due to the nature of the emergency itself.").

⁴⁴ See e.g., Meagan Flynn, Hundreds of Struggling Renters in Nation's Capital Line Up to Ask for Help, Washington Post (November 21, 2025), <https://www.washingtonpost.com/dc-md-va/2025/11/21/emergency-rental-aid-dc-erap-eviction/>.

⁴⁵ *Id.*

⁴⁶ FY2024 DHS Performance Oversight Responses, response to Q171, *available at*: <https://lims.dccouncil.gov/Hearings/hearings/706>.

⁴⁷ FY2025 DHS Performance Oversight Responses, response to Q201, *available at*: <https://lims.dccouncil.gov/Hearings/hearings/2104>.

⁴⁸ Fiscal Year 2026 Budget Support Act of 2025. SUBTITLE G. TANF BENEFITS.

⁴⁹ The agency reported that 7,838 or 50.9% of TANF households are currently at 60 months or more on TANF. Note the agency should also provide how many children are in each of those households. FY2025 DHS Performance Oversight Responses, response to Q209, *available at*: <https://lims.dccouncil.gov/Hearings/hearings/2104>.

⁵⁰ TANF is Still a Lifeline, *available at*: <https://childrenslawcenter.org/our-impact/systemic-reform/tanf-is-still-a-lifeline/>.

⁵¹ Lucie Schmidt, Lara Shore-Sheppard, Tara Watson, “The Effect of Safety Net Programs on Food Insecurity,” National Bureau of Economic Research, (October 2013), *available at*: <http://www.nber.org/papers/w19558>; Ali Zane, Cindy Reyes, and LaDonna Pavetti, “TANF can be a critical tool to address family housing instability and homelessness,” Center on Budget and Policy Priorities, (July 19, 2022), *available at*: <https://www.cbpp.org/research/income-security/tanf-can-be-a-critical-tool-to-address-family-housing-instability-and>; Chelsea Coffin and Hannah Mason, “Patterns and predictors of chronic absenteeism in D.C.’s middle and high schools,” D.C. Policy Center, (October 14, 2025), *available at*: <https://www.dcpolicycenter.org/publications/patterns-and-predictors-chronic-absenteeism-dc-middle-and-high-schools/>; Kate Coventry, “When Every Dollar Counts: Child Poverty Has Lasting Negative Effects, But Even Small Income Boosts Help,” DC Fiscal Policy Institute, (February 11, 2016), *available at*: <https://www.dcfpi.org/all/when-every-dollar-counts-child-poverty-has-lasting-negative-effects-but-even-small-income-boosts-can-help-2/>; Sonya Troller-Renfree, et al., “The impact of a poverty reduction intervention on infant brain activity,” Proceedings of the National Academy of Sciences, (February 1, 2022), *available at*: <https://pubmed.ncbi.nlm.nih.gov/35074878/>; Aditi Shrivastava and Urvi Patel, “Research Reinforces: Providing Cash Assistance to Families in Poverty Reduces Risk of Family Involvement in Child Welfare,” Center on Budget and Policy Priorities, (May 1, 2023), *available at*: <https://www.cbpp.org/research/income-security/research-reinforces-providing-cash-to-families-in-poverty-reduces-risk-of>.

⁵² “Since Georgia implemented work requirements in 2020, they have spent twice administrative costs as on healthcare for people.” Highlighting the pause that additional onerous requirements may seem to be saving money in one place but are really spending more money elsewhere.

⁵³ Extensive endnote citing to the studies. *See* US Government Accountability Office, Medicaid Demonstrations: Information on Administrative Spending for Georgia Work Requirements, (September 3, 2025), *available at*: <https://www.gao.gov/assets/gao-25-108160.pdf>.

⁵⁴ TANF is a Lifeline for Parents in Low-Wage Jobs and Those Facing Job Barriers, (2026), *available at*: <https://childrenslawcenter.org/wp-content/uploads/2026/01/TANF-Employment-One-Pager.pdf>.

⁵⁵ Last year, there were four questions on TANF which gave high-level information on the program – mainly focused on number of families receiving TANF and termination of TANF. This year there are about 30 questions on TANF that get into significantly more detail on the program and it’s implementation. FY2024 DHS Performance Oversight Responses *available at*: <https://lims.dccouncil.gov/Hearings/hearings/706>; FY2025 DHS Performance Oversight Responses, *available at*: <https://lims.dccouncil.gov/Hearings/hearings/2104>.

⁵⁶ FY2025 DHS Performance Oversight Responses, response to Q225, *available at*: <https://lims.dccouncil.gov/Hearings/hearings/2104>.

⁵⁷ This year, the Committee asked “how many and what percent of participants received SNAP; b. How many and what percent of participants received SSI; c. How many and what percent of participants received SSDI; and d. How many and what percent of participants received DHS housing assistance.” It is very helpful to see that majority of individuals are on SNAP, a limited number are on SSI/SSDI, and almost a quarter are receiving some kind of DHS housing assistance. These are all programs that are subject to cuts in this coming fiscal year so the impact of TANF cuts will potentially be felt even more deeply for those impacted by these additional cuts. FY2025 DHS Performance Oversight Responses, response to Q207, *available at*: <https://lims.dccouncil.gov/Hearings/hearings/2104>.

⁵⁸ To the extent DHS wants to rely on hardship exemptions to mitigate harm, the experience with POWER under enrollment is a useful and troubling guide to what might happen including the onus is on beneficiary to request and document.

⁵⁹ Chris Gamble, Children’s Law Center Testimony before the Committee on Health, (January 27, 2026), *available at*: <https://childrenslawcenter.org/resources/2025-26-oversight-testimony-department-of-health-care-finance/>; Chris Gamble, Children’s Law Center Testimony before the Committee on Health, (January 30, 2025), *available at*: <https://childrenslawcenter.org/resources/testimony-roundtable-on-managed-care-organizations-in-the-districts-medicaid-program/>.

⁶⁰ DCAS, also known as District Direct, is a web-based application that is intended to allow District residents to apply for certain public benefits available in the District. The goal of DCAS is to streamline the application and recertification processes by linking a central system to various data sources to eliminate repeated data entry through forms and applications. After more than a decade of implementation, concerns with the performance of the software remain. *See* Joint Roundtable, Committee on Health and Committee on Housing, Roundtable on Health and Human Services Benefits Enrollment and the DC Access System, (December 4, 2023), *available at*: <https://www.youtube.com/watch?v=og6SL6fHaso>.