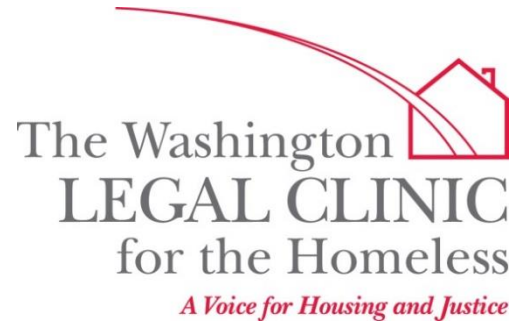


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DCHA’s Public Comment Period and Hearing held on June 20, 2024, for the Modification of the 2024 Administrative Plan

Testimony of Brittany K. Ruffin, Director of Policy and Advocacy, and Charisse Lue, Staff Attorney, The Washington Legal Clinic for the Homeless

Since 1987, the Washington Legal Clinic for the Homeless has envisioned and worked towards a just and inclusive community for all residents of the District of Columbia—where housing is a human right and where every individual and family has equal access to the resources they need to thrive. Unfortunately, this decision that DCHA now faces is due to the mayoral administration’s poor planning, cruel policy decisions to consistently underfund its own housing programs, and unwillingness to reform a failing housing program, despite the years-long calls from participants and advocates.

Mayor Bowser’s proposed FY25 budget included her policy decision to terminate 2200 families by the end of July 2024 and a thousand more in FY25 from the rapid re-housing program. Her agency not only decided to cut off the housing payments for thousands of families it knows cannot afford housing on their own, but her administration also failed to fund a single new housing voucher-- despite those same RRH families and many other D.C. residents facing or experiencing homelessness. After proposing a deeply inequitable and fundamentally flawed budget, the Bowser administration now punts its responsibility to DCHA to remedy its failure to invest in housing resources and programs that low-income D.C. residents rely on.

This Administration and its agency, DHS, has requested that DCHA use its HCVP resources and implement a “special admissions preference” to prioritize the RRH families that DHS is choosing to terminate. The WLCH represents households currently being terminated

from the Rapid Re-Housing Program due to an arbitrary time-limit *and* households who have been on the waitlist for an HCVP voucher for decades. All D.C. residents should have access to housing resources that permanently end and prevent homelessness. We hope that DCHA will encourage the mayoral administration to invest more appropriately in housing resources and programs in the future instead of looking to non-mayoral agencies to fix bad budgeting decisions.

This testimony will focus on the substance of the proposed amendment. If DCHA grants the mayor's request, it is important to note that the proposed language of the amendment will not keep the terminated RRH families from immediately returning to homelessness. The proposed language must be amended to ensure that the intended RRH families can receive the HCVP vouchers.

First, DCHA must remove the qualification of "good standing" from the proposed language. Most of the RRH families will not qualify under DCHA's definition of "Good Standing." Due to DHS' termination of the FRSP subsidy without regard to the existing lease, most of the families may owe rent. If DCHA intends to prioritize and match the exiting RRH families to the HCVP program as the mayor requested, an exception for "good standing" must be included in the regulation.

Second, the proposed language must be expanded to capture the intended and impacted RRH families upon which the mayor's request is contemplated. Eligibility cannot be restricted to current FRSP program participation. The current language in the amendment will exclude all RRH participants that have already been terminated from the subsidy due to the "time limitation" and before this rule is promulgated. DHS began terminating the 2200 families in May. Hundreds more will be terminated by the end of this month. DHS plans to issue the last round of exit notices on July 1, and those families will be terminated by the end of July. If the proposed language passes with a requirement of current FRSP participation, very few of the 2200 families facing termination from rapid rehousing will be eligible for the vouchers. The current language

contradicts and frustrates the entire purpose of the mayor's request. Conflicting and confusing language in the rule will create unintended barriers for the RRH families to access the HCVP program.

Additionally, if DCHA's intent in proposing this rule is to match all 1,300 housing choice vouchers to the 2,200 families exiting or exited from the RRH program due to "time limits" and/or "program expiration," the language must be precise and expressly state the intended number of vouchers that DCHA will utilize for the exiting or exited RRH families. The language should be clear in indicating what "DCHA's voucher capacity" is if it differs from the 1,300-voucher allotment. Otherwise, DCHA's plan for voucher administration is unclear.

Finally, DCHA should request that DHS include in the proposed MOU that, if DCHA grants the request, the agency will rescind termination notices and continue to pay the housing subsidies until the subsidies can be swapped and/or families are leased up with the new HCVP vouchers. Otherwise, families will continue to lose their rental subsidy and face displacement and/or eviction before they receive the HCVP voucher. Families should not suffer further consequences of DHS' thoughtless plans if DCHA assistance is forthcoming.

DCHA's Proposed language for new Section 14 DCMR 5501.57 should read as follows:

DCHA will offer a limited special admissions preference to applicants referred by the Family Rehousing Stabilization Program of the District of Columbia's Department of Human Services (DHS) in accordance with an MOU to be established between DHS and DCHA. This MOU will require that DHS maintain the rental subsidy for any applicants until the leasing up process is complete. This preference is only available for applicants ~~who are in good standing with the Family Rehousing Stabilization Program whose participation is ending due to time limits for assistance and/or program expiration.~~ participants in the Family Rehousing Stabilization Program or former participants who were terminated starting May 2024 to _____ for "time limits" and/or "program expiration". DHS will be responsible

for assisting participants with applications for the housing choice voucher program and for referring ~~qualifying applicants to DCHA~~ the Family Rehousing Stabilization **participants and former participants to DCHA**. This preference will be available until the sooner of the following occurs: DCHA reaches its voucher capacity, as determined by DCHA; 1,300 tenant-based vouchers are issued to applicants who qualify for this preference; or DCHA processes all participants referred by DHS or **participants that directly applied to DCHA for the special admissions preference**. DCHA will accept applications under this limited local preference continuously until reaching the established ~~limit, regardless of whether the waiting list is closed to other applicants.~~ **voucher allocation limit**.