

D.C. Council Committee on Human Services-DHS Performance Oversight Hearing-
February 26, 2026

*Testimony of Joshua M. Drumming, Policy and Advocacy Attorney, and Brittany K. Ruffin,
Legal Director, Systemic Advocacy and Litigation, The Washington Legal Clinic for the
Homeless*

The Washington Legal Clinic for the Homeless envisions a District of Columbia where housing is a human right, racial justice is a reality, and all people have true and meaningful access to the resources needed to thrive.

It seems that every year, residents see a further dismantling of D.C.'s social safety net, making mere survival in the District increasingly implausible. Black residents that have lived here for generations continue to struggle to survive in a D.C. that increasingly prioritizes affluence. D.C. Council needs to invest in permanent housing resources, force DHS to improve its provision of services, restore access to rental assistance, improve the shelter system, and make D.C. a place that reconciles the new D.C. with the D.C. of old.

I. End Homelessness and Increase Transparency

One of the most effective ways to end D.C.'s homelessness and affordability crisis is to use and appropriately fund all of the different types of vouchers available. This means PSH vouchers, but also lower barrier vouchers, such as LRSP vouchers, which are less costly and more accessible to a larger cross-section of D.C. residents in need of stable housing. D.C. Council must ensure that DHS and DCHA have the requisite staffing and coordination for participants to be quickly identified and approved for permanent housing resources and to swiftly lease up. Agency bureaucracy prolongs homelessness.

This year's Point-in-Time census was canceled, but due to multiple legislative changes, as well as policy and regulatory shifts, there is a high likelihood that homelessness in the District has increased. D.C. has an unemployment rate 155% of the national average (6.7% versus 4.3%), a largely defunded Emergency Rental Assistance Program with a higher-barrier eligibility threshold, a Rapid Re-Housing program that has been substantially dismantled, and inadequate voucher resources. A lack of investment in housing resources will only lead to an increase in homelessness.

Last budget season, zero vouchers for individuals were funded by the Mayor or D.C. Council. While 176 Permanent Supportive Housing (PSH) vouchers and 160 Targeted Affordable Housing (TAH) vouchers were funded, the amounts are woefully inadequate to

meet the need. This is an even more dangerous state of affairs since last year ushered in an unprecedented level of local-federal cooperation, via a joint local-federal encampment task force, that specifically targeted unsheltered D.C. residents. It is incumbent upon the D.C. Council to adequately fund vouchers for individuals so that there will be fewer unhoused residents subject to this task force's actions. In addition to this new threat, the unsheltered community must always contend with the inherent and natural dangers of living outside. Between 2023 and 2025, 272 homeless individuals died from multiple causes related to living outside. These deaths should be unacceptable in a place as well-resourced as D.C.

Unfortunately, vouchers have little utility if they are not appropriately used to end homelessness for D.C. residents. This Committee must ensure that DHS is appropriately budgeting in order to properly administer funds allocated by D.C. Council. Too often, issues about inaccurate costs arise after funds are allocated. DHS cannot be allowed to have an opaque agency budget. D.C. Council must increase oversight of DHS and DCHA to promote more efficient voucher administration, utilization, and staffing.

II. Plan Appropriately for Residents With Extremely Low Incomes

Rapid Re-Housing (RRH) was created to support low-income D.C. residents, placing them on a path to financial fortitude by subsidizing the majority of their monthly rent. Unfortunately, the program has never achieved its stated ends. Its "one-size-fits-all" model cycles the lowest-income residents in and out of homelessness, sometimes saddling them with evictions and experiencing more financial harm than before entering the program. We have testified to this reality for years, but instead of reforming the program into one that is more narrowly tailored to better address its issues, DHS decided to mass exit participants from the program. These program exits hinge upon arbitrary benefits cliffs rather than participants reaching financial stability or being matched to permanent housing resources. In lieu of the latter, DHS has put nearly all of their resources into shallow subsidies, such as DC Flex, that are incapable of establishing enduring housing stability for the extremely low-income residents that make up the overwhelming majority of Rapid Re-Housing's participants.

Beyond this, DHS promulgated regulations and a Budget Support Act that eviscerated virtually all substantive and procedural appeal rights, in complete violation of due process standards. Instead of participants being able to appeal their program exits before the Office of Administrative Hearings (OAH), they are confined to DHS administrative hearings, a body that has a vested interest in exiting them from the program.

Cutting participants from the Rapid Re-Housing Program and/or other shallow subsidies without any real plan for housing stability only results in a cycle of residents returning to the shelter system more harmed by D.C. government than when they originally entered Rapid Re-Housing. There have also been several instances of families being exited from Rapid Re-Housing, losing their subsidy without another means to pay rent, facing eviction and/or returning to shelter, and then eventually receiving a new offer of Rapid Re-Housing. DHS has even expressed a willingness to pay people to leave D.C. through their Project Reconnect program rather than pay for them to be housed in the District. Such actions are harmful, cruel, and defy logic. Families should not be treated with such a lack of care. DHS and D.C. Council need to realistically and meaningfully plan for the many families and individuals who cannot afford market rent when the short-term housing programs and subsidies end.

III. Restore ERAP Accessibility

The Emergency Rental Assistance Program (ERAP) helps D.C. residents maintain housing and avoid eviction. Due to last year's legislative alterations that drastically restrict eligibility, it is now inaccessible to many D.C. residents that need it. These changes were largely based upon unsubstantiated allegations of fraud, racist tropes, and classist myths about low-income, Black people. D.C. Council should amend the program yet again to expand access and prioritize tenant interests.

We ask D.C. Council to increase oversight to require regular reporting on ERAP administration and distribution, including timelines, staffing, and delays of administering organizations. D.C. must collect and share data on the efficiency of the current program and the demographics of the residents able to access the rental assistance. Council must put pressure on DHS to release new ERAP regulations that provide greater transparency and guidance on the current ERAP regime. D.C. Council must also increase landlord accountability in this process, establishing minimum standards for participation and cooperation with ERAP when a tenant is seeking assistance. When landlords refuse to cooperate, tenants should not have to bear the consequences.

IV. Reform and Expand Access to Shelter System

Changes in D.C.'s housing apparatus have likely led to an increase in overall homelessness. It is incumbent upon D.C. Council to make these sites safe and accessible. Accessibility has seemingly decreased since the Virginia William Family Resource Center's move to 64 New York Avenue.

Last oversight season, we testified about the changes to the VWFRC status quo. Historically, The Legal Clinic has played a critical role in informing denied families of their rights and assisting them in obtaining emergency shelter. Upon VWFRC's relocation, our staff was prohibited from continuing to do outreach in the VWFRC lobby, severely reducing the number of denied, but eligible, shelter applicants we can help access shelter. While DHS assured D.C. Council that their services would remain just as accessible as they were in their Rhode Island location, our office's shelter access case numbers indicate that this is not the case. If shelter applicants cannot connect with assistance and are unaware of their rights under the HSRA, particularly during hypothermia season, families will unnecessarily remain in unsafe conditions. This Committee should ensure transparency and accessibility.

Beyond shelter access issues, there are many shelter conditions issues. Many people in encampments have cited shelter issues that prevent them from accessing shelter. Some of those concerns include employee aggression and harassment, pest infestations, limitations on the number of belongings that may be brought into the shelter, lack of storage, sanitation issues, and limited and limiting views on what counts as family-- particularly as it pertains to pets and nontraditional family members. D.C. Council should put forth legislation that enhances shelter storage capabilities, recognizes different types of families, implements shelter training and protocol standardization, and acknowledges the dignity of all who seek services.

Conclusion

Increasingly, D.C. residents are being reminded of how fragile their access to critical human services continues to be. It consistently seems that those without high incomes are forced to defend their right to exist in D.C. Residents deserve programs and agencies that aim to provide efficient and adequate support. D.C. Council must use its oversight authority to ensure that DHS is accountable to the residents it serves.