



COMMENTS TO THE MAYOR'S PROPOSED BUDGET RECEIVED VIA EMAIL AS OF 5:00 PM ON 04/19

Updated: 3 May 2024

PURPOSE

To compile comments the ICH received via email for inclusion in the report of Comments to the Mayor's Proposed Budget for Fiscal Year 2025 (FY25).

BACKGROUND

[DC Code § 4-752.02\(c\)](#) legislatively mandates that the ICH comment on the Mayor's proposed budget for services within the Continuum of Care each year.

"The Mayor shall, upon release of the proposed annual budget each year, make available to all Interagency Council members the District's proposed budget breakdown of each agency's appropriations for services within the Continuum of Care. The Interagency Council shall give comments to the Mayor regarding the proposed budget."

To comply with this requirement for the proposed FY25 budget, the ICH Team scheduled six ICH Budget Engagement Sessions in April 2024. The goal was to create an opportunity for each District agency member to present the details of the Mayor's Proposed Budget and for members representing the community to comment on the details presented.

The ICH Team accepted public comments in real-time at the virtual meetings and in writing via email until the Close of Business (5 pm) on Friday, 04/19. There was one noted exception for a submission from a community representative of the Full Council. With no objections from the ICH Full Council upon the transmittal of the draft report, the ICH has included the submission in this document.

COMMENTS RECEIVED

SYNOPSIS OF COMMENTS RECEIVED

Key takeaways from comments and submissions the ICH Team received via email are outlined in the table below.

Comments	Description
On Budget Process Overall	
Budget Engagement Timeline	Recommendation for ICH Budget Engagement Sessions and analysis earlier in the budget formulation and review process.
Cross-Cutting Concerns	
Racial Equity	Concern for the continued impact of underfunding and implementation delays on Black families and individuals.
People with Lived Experience	Concern about agency reliance on people with lived experience to advance initiatives or represent vulnerable individuals without adequate vetting, training, and support.
Agency Accountability & Reporting	Call for agency accountability related to reporting of incidents, including abuse, budget transparency, and program outcomes with significant concern about perpetuating broken systems and trauma.
Specific to Agency Budgets	
DBH	Questions related to Medicaid Waiver expansion of behavioral health services and opportunities for cost savings. Concerns about proposed elimination of the Urgent Care Clinic at DC Court and implications for individuals who are high-need.
DGS	Request to ensure funding for CCNV Shelter Replacement meets the need. Recommendation to add funds to continue the standalone public restroom pilot fundamental to promotion of human dignity and health.
DHCF	Challenges in navigating Medicaid renewal process.
DHCD	Recommendations to Add an additional \$41 million to the Housing Production Trust Fund (HPTF) and ensure that the Project and Sponsor Based Local Rent Supplement Budget (PS LRSP) is sufficient; Add an additional \$5 million to the Housing Preservation Fund (HPF); and Allocate \$30 million to the First Right Purchase Program (FRPP).

DHS	<p>Overall need for more resources, including: PSH vouchers for Individuals, PSH and TAH vouchers for families, shelter storage solutions, non-congregate shelter, Emergency Rental Assistance Program (ERAP), DC Flex and Career MAP.</p> <p>Specific recommendations:</p> <p>To add at least an additional \$80 million to ERAP</p> <p>Fund minimum of \$1.75 million for Project Reconnect (prevention for single adults) for the addition of diversion specialists</p> <p>To add an additional \$2.9 million to Street Outreach to make up lost capacity from the CARE pilot and expand coverage of encampment and specific neighborhood outreach such as U Street and Georgia Avenue.</p> <p>Restore RRH funding for individuals and add \$2.5 million for an additional 100 slots for individuals and promote system flow.</p> <p>To add funding for to meet the need for individuals and families, given the proposed cuts to FRSP and otherwise lack of new resources once all FY23 and FY24 PSH resources have been utilized.</p> <p>Concern on proposed 50% cut to the Rapid Rehousing budget for single adults.</p> <p>Concern on proposed cuts to family programs including the Homelessness Prevention Program (HPP) and Family ReHousing and Stabilization Program (FRSP) and the impact on families and service providers.</p> <p>Appreciation for preservation of and continued investments in Career MAP and shelter for single adults, especially continuation of 24/7 low barrier shelter.</p>
MOLGBTQA	<p>Resources for cultural competency and awareness training specific to gender identity, gender expression, and issues that the transgender community faces.</p>
OCA	<p>Recommendations on how to increase revenue:</p> <p>Taxing capital gains separately from ordinary income and at a higher flat rate of 13 percent, paired with a credit to offset tax increases for families in the bottom 80 percent of incomes.</p> <p>Raising property tax rates on homes with a taxable value above \$1.5 million, which would impact only 5 percent of homeowners.</p>

ORIGINAL SUBMISSIONS

The original submissions, including emails and written attachments, are included below and organized by order of receipt, starting with the comments received first.

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From: Hilgendorf, Shawn (Council) <shilgendorf@dccouncil.gov>

Sent: Sunday, April 7, 2024 10:55 PM

To: Silla, Theresa (EOM) <theresa.silla@dc.gov>

Cc: Rosa, Eileen (EOM) <eileen.rosa@dc.gov>; Sayama, Aaron (EOM) <aaron.sayama@dc.gov>; Creighton, Ciana (EOM) <ciana.creighton@dc.gov>

Subject: RE: ICH Meeting -- Follow Up re ICH Full Council Mtg & Schedule for an ICH Specific Budget Oversight Hearing with Council

Hi Theresa,

The CM wasn't making a connection between the budget engagement forums and those goals, those were separate topics.

I think the three main takeaways he intended to share were:

We are hearing significant concern from stakeholders who feel that the ICH is deprioritizing young people; We value ICH's input but in the future, we should consider ensuring that you are providing input in time for it to impact decisionmakers – either the Mayor before she proposes a budget or the Committee before it marks up a budget. Once the intended impact of the comments is established, we could then work backwards to a law or process change to ensure that we match the effort and engagement to the intended impact. We think the District as a whole lacks sufficient analysis to ensure are meeting people's needs with the interventions that are both cost-effective and improve outcomes. That has a lot to do with the timing of the intervention to maintain as much stability for the residents as possible. We don't expect that analysis to be complete during this budget process – but wanted to know if this was something ICH would be able to take on – either currently, or with additional staffing or resources.

Sincerely,

Shawn J. Hilgendorf | Committee Director

Office of At-Large Councilmember Robert C. White, Jr.

Chair, Committee on Housing

Council of the District of Columbia

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JAKIA CARROLL, CONSUMER

From: JC&Kemontay <jakiacarroll@gmail.com>

Sent: Thursday, April 11, 2024 7:24 PM

To: Silla, Theresa (EOM) <theresa.silla@dc.gov>; Rosa, Eileen (EOM) <eileen.rosa@dc.gov>

Subject: ICH Hearing comments 4/11/24

Good evening, ICH family, I would like to send my comments about today's meeting in this email. I am hoping that we can find time to discuss these matters in our meetings to come.

Please let me say that it is very offensive of the agencies to praise themselves for good work when all the reports show that 80% or more of the damage and harm is to the blacks with a small percentage of brown people. I do know that the Spanish are people that stick together and will work together to help each other so it is harder to use them to harm mass amounts of their people.

The mass amounts of money allocated to the agencies do not help the people. The agencies are looking out for themselves and those who will work with them in the broken system. There is not one person from one agency who took accountability for what is happening to our families and communities due to our agencies.

DHS is failing along with TCP, MPD, DC Council, and the rest of our government. There are no actions geared toward any of the agency's nice words on paper. The agencies function the opposite of what they create on paper unknowingly. These agencies collaborate well with the feds to commit crimes and the things done to me are not unique. I am one of the few that stand with God first so my foundation is real. The increase in mental health is due to the severe treatment and abuse of our people through the agencies. The agencies (All the agencies have reports showing the harm and danger to us by them and they are the most supported agencies).

The use of the people in lived experience to represent the most vulnerable people has been very beneficial to the agencies. Many of the people you seat on our committees and support through your agencies are not people who are for the people. I have witnessed what you use your lived experience with leaders and advocates to do with dealing with PFFC. The same abuse and dysfunction these people live in personally is forced on anyone who allows them in their lives and you have benefited from this with Rachele Ellison and Robert Warren. Our people in lived experience are still in addiction or in the same mindset as a user. These people did not work to do better to heal and be better people, they collaborated with your agencies in a sick mentality to create more chaos and dysfunction among the people with lived experience to prevent them from uniting or standing together. You have PFFC as HMIS when PFFC is incapable of establishing operations to meet government standards yet you put our people in more harm pretending not to know. You support the harm done by supporting these people. The people in lived experience are forced into this to support their own lives not to support the people. I am not saying anything that you do not know and are not aware of nor that I have not spoken to anyone I spoke about, face to face.

In one year DHS, CFSA, DBH, DC Council, MPD, and any other agency needed to create a background to prey on my son and deny all my human rights by using federal informants Demetrius Perkins, Andre Hines, Christopher Stanley, and others from the Commonwealth of Virginia Prince William County using all the same agencies above across different jurisdictions. These are normal things done to us to deny our human rights and keep us under. I am doing the right things because the odds are that I will die in this so you can go on pretending to be good and decent people while harming the people using the broken system. I have been involved before, during, and after the government hate crime and premeditated molestation of my son. All your agencies have shown me that we are nothing and you will do anything to us in hatred using our democracy. There is no care for what is happening to us and no accountability for our children who are harmed by your actions. I am a Mother and I am doing what is right for the children. I have no intentions of begging for human rights so I do know my time is limited on this earth. I am aware that you will kill me and I don't care because my son is in danger with you and no one cares about what you are doing to us. Over the past five years, you have committed several crimes in my life and you pretend and keep harming us. I love my children and I do not harm any children yet DHS was able to create a background using VA to support Commonwealth of Virginia Senior Justice Supreme Millette Jr. This is what true white power looks like in reality, today. Two decades of crimes using street criminals to assist in molesting children and not one good person caring. The things done to my son are sick and wrong and because I do not have human rights I am forced to stand as I do knowing you are trying to kill me. Please do not fall apart about the truth, I am okay with it. I know this was done for me to die and I am willing to die for mine. We do not matter and these agencies are meant to enslave us using modern methods and our people. You all have worked hard over the years to show me who and what you stand for so there is no reason for me to pretend or go along with any harm to our children. What we face is real and you downplay the damage and harm to make it acceptable to the people.

There is not one agency you do not work with to harm but it is impossible for you to come together and help us. This is intentional hatred and denial of human rights and because you forced the people out of their minds, into drugs, or severe crime you got to scapegoat and blame them for all you have done to them to deny life and liberty. I am so sad and I stand for the children and the people in love because I matter to me and life matters to me. There is no way to tell me you value you and not value others. You are worth it and we are worth it.

Blessings and Peace family,

Advocate Jakia Carroll

Stand For Something or Fall For Anything

From: Deborah Jones <djones@housingup.org>

Sent: Wednesday, April 17, 2024 2:01 PM

To: Info, ICH (EOM) <ich.dmhhs@dc.gov>

Subject: RE: [External!] ✨ ICH Budget Engagement Sessions: Mtg Materials & Reminders

Good Afternoon,

I am sick and not sure if I will be able to attend the budget meetings today. However, I did want to submit the following questions for the budget meetings:

DBH

How will the Medicaid waiver expansion increase capacity and services?

Have there been cost savings as a result of the rehab option?

If there have been cost savings, how were those savings reinvested in program services?

DHCF

One of the biggest problems faced by the people we serve is renewals for Medicaid. Has Medicaid considered requesting special renewals for Medicaid, like other states, such as clients who are homeless (receiving HSS case management services via DHS) are renewed automatically or for hard-to-reach clients with no fixed address or no telephone or have extenuating circumstances can't get to an office OR are very low income automatically renewed. Outreach workers?



Deborah Jones | Clinical Manager, PSH

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Housing Up | 1322 Main Drive, NW Abrams Hall | DC 20012 | **United Way NCA Designation Code: 8441** | CFC #62065

From: Rebecca Kellett <rebecca@gmcgt.org>

Sent: Friday, April 12, 2024 6:33 PM

To: Info, ICH (EOM) <ich.dmhhs@dc.gov>

Cc: Rosa, Eileen (EOM) <eileen.rosa@dc.gov>

Subject: Training Suggestion

Hi ICH Team--

I was tuned into the budget session the other day with the mayor's office of LGBTQ+ affairs and heard the request from Nikila for some type of transgender training. I just thought it might be helpful to share this [resource](#) -- we use this training program for a lot of our onboarding training. It was created primarily for libraries because they end up serving as drop-in centers. Apparently he is pretty controversial among librarians and social workers according to Jean and Kalea at DCPL but maybe has learned from his mistakes before creating this program? I think it is really helpful for our team and you know I'm a social worker so maybe that counts for something.

Anyway, he recently had a conversation with a transgender advocate who does a really good job of educating and explaining different gender identities, gender expressions, issues the transgender population is facing, etc. I found it to be really helpful and happened to watch it just before the budget hearing. Today I shared it with my staff and we had a really engaging and open discussion about it. Turns out it is also available on youtube. Here is the [link](#). It may be a good start for some!

Hope this helps.

Rebecca

ROXANNE MURRAY (ECHELON COMMUNITY SERVICES)

From: Roxanne Murray <rmurray@echeloncommunityservice.org>

Sent: Thursday, April 18, 2024 4:38 PM

To: Silla, Theresa (EOM) <theresa.silla@dc.gov>

Subject: Budget Engagement Feedback

Good afternoon Theresa,

I am contacting you to request that we engage in a conversation to develop a comprehensive approach to how we can leverage ICH engagement to better influence budget discussions much earlier in the process. It is apparent that our collective voices, in conjunction with the community activists, would be better served if we were "at the table," and able to contribute to the dialogue regarding priorities early on, as opposed to simply voicing concerns after the fact.

I would participate, and I am sure others will commit to this approach as well because it will mean the inclusion of the diverse voices that do the work, and live through the experience. Thank you.

--

Regards,

Roxanne Murray, JD | Project Director

Echelon Community Services

5009 E. Capitol Street, NE, Washington, DC 20019

rmurray@echeloncommunityservice.org

P: 240-790-5685 (O) | 202-903-8618 (C) F: 202-827-7866

From: Lynn Amano <lamano@friendshipplace.org>

Sent: Thursday, April 18, 2024 4:51 PM

To: Info, ICH (EOM) <ich.dmhhs@dc.gov>

Cc: Silla, Theresa (EOM) <theresa.silla@dc.gov>; Green, Colleen (DHCD) <c.green@dc.gov>; Shellon Fraser <sfraser@nhtinc.org>; Pugh, Synina (EOM) <synina.pugh1@dc.gov>; Rosa, Eileen (EOM) <eileen.rosa@dc.gov>

Subject: Re: ICH Budget Engagement Sessions: Written Comments

Dear Director Silla, Eileen, and fellow staff.

I have been following along the budget engagement sessions, and while I did find them helpful for clarifying a few parts of the various departmental budgets, my comments are for the most part about the general system.

I do believe that as an advisory Council to the Mayor's office, information about the needs of the system as seen by the ICH Full Council would be best transferred to the mayor prior to her development of the budget.

After her budget has been released, most of us are already testifying before the DC Council Committees, and making our case and to where and how the DC budget should be spent as regards to our organizations' values and goals. In other words, the post-mortem assessment, while informative, doesn't really have an opportunity to impact either our, or the Council Member's, reads of the budget beyond that of the budget hearings.

With that said, we have been advocating for more resources with The Way Home Campaign, Fair Budget Coalition, and others in the areas of

PSH vouchers,

Shelter storage solutions,

non-congregate shelter,

ERAP, and we

Strongly support for programs like FLEX and Career Map.

Friendship has also advocated for a coordinated website/portal system to enhance communications between DHS, DCHA, Participant, landlords and providers to provide more efficiency and accountability in the voucher process. We strongly encourage the Council to look at revenue raisers (see Just Recovery DC for some opportunities to pursue them) to better fund this budget and help reduce the burden on the most vulnerable DC residents.

We are also advocating for Council Members to take a closer look at ways to fund services to improve the experience of our aging shelter population, and have begun a Coalition on Aging and Homelessness to advance this initiative.

Thank you,

Lynn Amano

EVERYONE HOME DC - ATTACHMENT INCLUDED

From: Abby Sypek <sypek@everyonehomedc.org>

Sent: Friday, April 19, 2024 4:48 PM

To: Silla, Theresa (EOM) <theresa.silla@dc.gov>

Cc: Karen Cunningham <cunningham@everyonehomedc.org>; Info, ICH (EOM) <ich.dmhhs@dc.gov>

Subject: Comments from Everyone Home DC on the FY25 Budget Proposal

Hi Theresa,

Here are comments from Everyone Home DC on the Mayor's FY25 budget proposal. We appreciate you and your team's facilitation of budget engagement sessions to help us better understand what was included in this proposal. Please let us know if you have any questions. We hope you have a great weekend!

With gratitude,

Abby

--



ABBY SYPEK, MSW

she, her, hers

Chief of Staff

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SEEING PEOPLE THRIVE

IS OUR FINISH LINE



**Comments from Everyone Home DC on Mayor Muriel Bowser’s FY25 Budget Proposal Submitted:
April 19, 2024**

Thank you, Director Silla, for the opportunity to comment on the Mayor’s FY25 Budget. We appreciate your and your team's effort in facilitating multiple budget engagement sessions with relevant agency directors and leaders. Listed below are our comments on the FY25 budget proposal.

Founded in 1967, Everyone Home DC’s mission is to support the holistic needs of individuals and families at risk of or experiencing homelessness in the District. Housing is our starting point, and seeing people thrive is our finish line. We envision the District of Columbia as a thriving and diverse community where everyone has access to safe, affordable, and comfortable homes regardless of wealth or social status. Everyone Home DC is a transformative, results-driven nonprofit organization whose homelessness prevention, housing, street outreach, drop-in day center, and supportive services have been the foundation for thousands of individuals and families to secure stable homes and build thriving lives.

Permanent Supportive Housing (PSH) & Targeted Affordable Housing (TAH) Vouchers	<p>Everyone Home DC is pleased that the unused PSH and TAH vouchers from previous fiscal years were maintained in this budget proposal. We look forward to continuing to collaborate with the Department of Human Services to implement these resources.</p> <p>We are concerned about the lack of additional PSH and TAH vouchers for FY25 and the ways in which it will impact our system since all FY23 and FY24 resources are slated to be matched by the end of this fiscal year. As a PSH provider, we understand and appreciate the commitment of the Department of Human Services and our community to implementing the FY23 and FY24 resources and know that we have made major strides in the implementation process over the last year. An example of this was when DHCA shifted its process for determining rent reasonableness. DHS worked diligently to get PSH providers access to the tool to check for rent reasonableness while looking at units rather than waiting for the Housing Authority’s determination.</p> <p>Through the work of our Street Outreach, Day Center, and Family Rapid Rehousing teams, we understand the vital role that PSH and TAH plays in our system. PSH is a critical support for families with complex needs who are likely to experience chronic homelessness</p>
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	<p>without both financial support and intensive case management to help them maintain housing stability. We need to be able to connect families who are in need of long-term support and affordability to PSH and families who simply need the long-term affordability to TAH.</p> <p>We also know that without PSH resources for Single Adults, the individuals experiencing chronic homelessness working with our Street Outreach Team and Day Center will continue to experience homelessness with little hope of becoming housed regardless of the amount of housing-focused case management we provide.</p>
Homelessness Prevention Program for Families	<p>With over eight years providing Homelessness Prevention (HPP) services, Everyone Home DC was concerned by an apparent reduction to Family Homelessness Prevention Services. We understand from Director Zeilinger’s testimony during the DHS Budget Oversight hearing that the reduction is the funds from the Talbert Street Project and not HPP service dollars.</p> <p>HPP is a vital program for families on the brink of homelessness. In 2023, we helped 92% of the families in our program avoid a shelter stay through mediation, flexible financial assistance, and short-term rental assistance. Any cuts to services will impact our ability to help families most vulnerable to becoming homeless in DC. At a time when ERAP is in high demand, homelessness prevention services are more important now than ever, as it is the last defense before a family becomes homeless and enters our shelter system.</p>
Family Rehousing and Stabilization Program	<p>The FY25 Budget for the Family Rehousing and Stabilization Program (FRSP) does not restore cuts made to FRSP contracts in FY24. In February of 2024, our FRSP team was informed that we could not fill our vacant case manager position, capping our programming at seven instead of eight case managers without reducing the number of clients we were expected to work with.</p> <p>In 2022, when we decided to pursue the new FRSP contract, it meant having to double the size of our program and we were concerned about the impact it would have on our organization as a whole. The primary reason we decided to continue our FRSP program, despite the challenge of the rapid growth, was the exciting and well-thought-out program design, which included a robust staffing plan with specialized positions and manageable caseload sizes. We built a highly capable and</p>

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	<p>dedicated FRSP team, and I am disheartened that they and the families we work alongside will continue to bear the burden of these cuts.</p> <p>We also understand that the FY25 budget for FRSP incorporates the exit of approximately 2,000 families from the program. We hope that the families in our program scoring for PSH or Targeted Affordable Housing will remain in the program until a resource is available to them, as they are otherwise likely to become homeless again.</p>
Preservation of Career MAP	<p>We are glad to see the preservation of the Career MAP Program. Career MAP is an innovative program that focuses on long-term sustainability in housing by providing families with the support needed to increase their income without worrying about the financial burden of losing their benefits. Our FRSP team frequently grapples with the issue of benefits cliffs and we appreciate this investment and look forward to following outcomes of this program.</p>
Continued Investments in the Single Adult Shelter System	<p>Everyone Home DC is excited about the continued investments in this budget proposal to reform the single adult shelter system, including funding for two non-congregate shelters, preserving 24/7 access to shelters, and redeveloping CCONV. We appreciate the commitment to providing more dignified shelter for single adults and sustaining the improvements DC implemented during the pandemic.</p>
Rapid Rehousing for Individuals	<p>We understand that this budget proposal will cut the Rapid Rehousing budget for individuals in half. We are concerned that a reduction in RRH-I services will negatively impact our single adult system by limiting the number of people able to access this resource thus increasing the wait time to enter the program. Increased wait times mean that people will be homeless longer. Data presented during the December 2023 ICH Single Adult Systems Workgroup meeting noted an average wait time from referral to match is 3.5 months. These cuts will only increase wait times and keep people experiencing homelessness longer. This will undoubtedly exacerbate physical and mental health conditions and distance people from employment opportunities making it more difficult to regain stability and exit out of homelessness.</p>
DC Flex	<p>DC Flex is another innovative program that provides flexible funds for individuals and families to spend on whatever they may need. The program gives a yearly stipend to use on various expenses and can be used in the case of an emergency. We understand that the program</p>

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	<p>will continue for families and individuals who are already enrolled, but no new individuals will be enrolled. The DC Flex Budget for single adults had been for 100 slots; however, only 25 individuals were enrolled before the funding was cut. At a time when ERAP is in high demand, programs like DC Flex could be an important resource for reducing the pressures on emergency rental assistance programs. Restoring funding to DC Flex is necessary so that the program can be fully evaluated to determine if it is a cost effective intervention that should be expanded.</p>
Urgent Care Clinic at DC Court	<p>We are concerned about the elimination of the Urgent Care Clinic at DC Court in the FY25 budget proposal and the implications that it will have on people who are court-involved and need immediate support and or linkages to mental health or substance use support. We understand that this program serves high-needs individuals who are unlikely to seek healthcare in other settings.</p>

From: Kate Coventry <KCoventry@DCFPI.ORG>

Sent: Friday, April 19, 2024 4:58 PM

To: Info, ICH (EOM) <ich.dmhhs@dc.gov>

Subject: Comments on the budget

My comments on the budget are attached.

Thanks,

Kate

Kate Coventry

She/her

Deputy Director of Legislative Strategy

DC Fiscal Policy Institute

202-422-0856

**Comments of Kate Coventry, Deputy Director of Legislative Strategy and
Voting Member of the Interagency Council on Homelessness
On the FY 2025 Proposed Budget
April 18, 2024**

Director Silla, thank you for the opportunity to submit these comments on the proposed fiscal year (FY) 2025 budget. My name is Kate Coventry, and I am the Deputy Director of Legislative Strategy at the DC Fiscal Policy Institute (DCFPI). DCFPI is a non-profit organization that shapes racially-just tax, budget, and policy decisions by centering Black and brown communities in our research and analysis, community partnerships, and advocacy efforts to advance an antiracist, equitable future. I am also a voting member of the Interagency Council on Homelessness (ICH).

DCFPI envisions a future where homelessness is rare, brief, and non-recurring, as outlined in Homeward 2.0, DC's strategic plan to end homelessness.¹ DC has made great strides towards this vision, but underfunding and implementation delays of proven, research-based strategies are undermining progress. The mayor's proposed FY 2025 budget freezes and cuts funding for programs essential to ending and preventing homelessness.

Black residents bear the brunt of current underfunding and implementation delays, and they will experience disproportionate harm from the mayor's proposed budget unless the DC Council addresses these shortcomings. Eighty-eight percent of residents counted in the District's 2023 Point in Time Count were Black.¹ This is the result of the enduring legacies of structural and individualized racism—such as racist zoning and residential segregation, redlining, restrictive covenants, and practices barring federal employment—that for years prohibited Black families from equitably accessing the housing and employment markets.

In addition to residents experiencing homelessness, nearly 90 percent of extremely low-income, severely rent-burdened households in the District are headed by a person of color and most of them are Black.² Addressing housing instability for these families is particularly important as rapid gentrification and the alarming rate of displacement puts at risk the economic security and the culture of historically Black neighborhoods.

DCFPI makes the following recommendations to the DC Council:

- Ensure the replacement for the Center for Creative Non-Violence (CCNV) Shelter meets the need;
- Fund new Permanent Supportive Housing (PSH) vouchers;
- Ensure adequate funding levels for Project Reconnect, Street Outreach, and singles Rapid ReHousing (RRH);
- Add funding to Emergency Rental Assistance Program (ERAP);
- Preserve funds for the DC Flex expansion;
- Add an additional \$41 million to the Housing Production Trust Fund (HPTF) and ensure that the Project and Sponsor Based Local Rent Supplement Budget (PS LRSP) is sufficient;
- Add an additional \$5 million to the Housing Preservation Fund (HPF);
- Allocate funds to the First Right Purchase Program (FRPP); and,
- Add funds to sustain public restrooms.

¹ Homelessness will be rare when services are in place to prevent as many people as possible from experiencing homelessness. Homelessness will be brief when individuals are helped as quickly as possible. And homelessness will be non-recurring when individuals have the supports they need to maintain their housing.

The Council Should Ensure the CCNV Shelter Replacement Meets the Need

Having served on the CCNV Shelter Replacement Task Force (Task Force), I am thrilled that the capital budget includes funds to replace this shelter and add housing on the site. The building was in horrible condition when the Task Force met in 2014, and these issues have only gotten worse since then. My understanding is that this will be a build-first project, meaning the new shelter will be built before the current building is closed. This will ensure that there is not a gap in services.

The Council should ensure that the replacement shelter is smaller and more dignified than the current facility, as called for in Homeward DC 1.0, the District's first strategic plan to end homelessness. The plan reports that, "in the District and across the country, best practices show that...individuals...can be more successful when shelter is provided in smaller, neighborhood-based settings where programming can be tailored to meet the needs of clients and where clients can more readily access services and support networks in the community."³ The Council should also ensure there is an exit plan for each current resident that prioritizes moving into housing rather than into the new shelter portion of the building. The goal is for individuals to achieve the stability that comes from moving into permanent housing.

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The Council Should Add Funding to the Budget for PSH Vouchers for Individuals

Every day individuals experiencing homelessness die from preventable and manageable diseases. This is particularly true for residents who are chronically homeless, meaning they have been homeless for years and suffer from life-threatening health conditions and/or severe mental illness. repeatedly. By providing affordable housing coupled with intensive case management services, PSH helps people stay in housing and improve their health.

The proposed budget does not include any new PSH vouchers. While there are unused FY 2023 and FY 2024 vouchers, DHS has reported that those will all be matched before the end of FY 2025. Once these resources are matched, thousands of individuals will remain homeless. It also means that highly vulnerable individuals who become homeless in October 2024 will have to wait at least a year before they can be matched to a voucher and start the process of moving into housing. The Council should add funding for PSH vouchers to the FY 2025 budget to meet this need.

The Council Should Add Funding to the Budget for Vouchers for Families

The proposed budget includes no new vouchers for families even though DHS reports that 2,000 families will be cut from RRH in FY 2024. Some of these families will cycle into and out of homelessness without long-term

² DC Interagency Council on Homelessness, "[Homeward DC: Strategic Plan 2015-2020](#),"

affordable housing. The Council should add funding for PSH and Targeted Affordable Housing vouchers to meet this need.

Council Should Ensure Project Reconnect, Street Outreach, and Rapid ReHousing Are Adequately Funded

Project Reconnect, the prevention program for single adults, plays a key role in making homelessness rare and brief. It helps individuals who are newly homeless or exiting from institutions, like jail or foster care, find alternatives to shelter, such as reuniting with friends and families. Shelter can be traumatic and unsafe, and investments in programs that help individuals avoid shelter can benefit them in the long run.⁴ Homeward DC 2.0 calls for more robust prevention services for individuals, and given the proven success of Project Reconnect, the District should ensure the program is fully funded, meaning all who qualify can receive services. The proposed FY 2025 budget is \$1.2 million. The Council should ensure that the budget is at least \$1.75 million, so the program can add diversion specialists who can serve more clients.

Street Outreach helps support some of our most vulnerable neighbors experiencing homelessness by connecting them to housing and other supportive services while also increasing health, safety, and quality of life while they are unsheltered. As of the January 2023 Point-In-Time count, unsheltered homelessness is up 19 percent from the previous year and is at its highest point since 2017. The proposed FY 2025 budget for Street Outreach is \$3.7 million but the Council should add an additional \$2.9 million to:

- Make up for outreach capacity lost through the sunsets of the CARE pilot, a time-limited initiative to address unsheltered homelessness in tent encampments;
- Add encampment focused outreach in Wards 6, 7, and 8, where it has not previously existed; and,
- Address increased outreach needs in specific neighborhoods, such as U street and Georgia Avenue.

RRH for individuals should be a critical component of making homelessness brief, but because of a lack of funding, the program is not meeting its potential. RRH is a voluntary program that provides housing search assistance, supportive services, and short-term rental assistance, generally up to 12 months. The program aims to move residents out of shelter as quickly as possible, which in turn allows more residents to access emergency shelter. Right now, individuals who would like to access RRH, but can't because a limited number of slots, must wait in shelter until another person exits the program. This will only get worse in FY 2025 because the proposed budget is just \$5.8 million, \$5 million less than in FY 2024. The Council should restore this funding and add \$2.5 million to create an additional 100 slots so that all individuals who are eligible and interested can enter the program immediately.

The Council Should Add Funding to Emergency Rental Assistance

ERAP helps residents facing eviction pay for overdue rent and related legal costs. The program also covers security deposits and the cost of the first month of rent for residents moving into new homes. Far too many DC residents experience housing instability that can lead to a need for ERAP. Nearly 40,000 households earn less than 30 percent of family median income, just \$31,950 for an individual, and pay more than half of their income in rent.^{5,6} These households are severely rent burdened and are one missed paycheck or illness away from losing their housing. These households also struggle to pay for other necessities like food, clothes, and healthcare, all of which have grown in cost due to inflation.⁷ In 2021, the median renter household with incomes under \$30,000 had just \$380 per month, respectively, after paying for housing to cover other necessities—the lowest residual incomes in 20 years.⁸

Research confirms that evictions are extremely harmful to those who experience them, often leading them into a downward spiral and setting them back for years. As Matthew Desmond documented in his book *Evicted*, eviction often “increases material hardship, decreases residential financial security, and brings about prolonged periods of homelessness. Families lose not only their home, school, and neighborhood but also their possessions: furniture, clothes, books. It takes a good amount of money and time to establish a home. Eviction can erase all that.”⁹

“Evidence strongly indicates that eviction is not just a condition of poverty, it is a cause of it,” explains Desmond.¹⁰ Evicted residents may also lose identification documents that are necessary for accessing benefits, enrolling in school, and applying for jobs—the steps that will help them move out of hardship. Evictions also lead to court records that can hurt a resident’s ability to find a new home, as many landlords screen out applicants who have an eviction on their record.¹¹ Evictions can also lead to job losses and depression.¹²

The Council should add at least an additional \$80 million to ERAP, bringing the total budget to \$100 million. This figure was developed with community-based partners based on the depletion of funds from FY 2023 and rate of applications in FY 2024.

The Council Should Ensure More Individuals Can Access DC Flex

DC Flex is a five-year shallow subsidy program that provides a fixed amount of cash assistance annually to working households who are struggling to afford rent. The goal of the program is to provide support that households can draw down flexibly as they need it. For example, residents with uneven income over the year, like those who do day labor, can use more assistance during colder months when work is more difficult to get. If the household does not use all the cash assistance that they receive, they can use it in the following year. When the District launched DC Flex, the program was limited to families with children. The District had planned to expand the program to serve 100 individuals, but due to proposed FY 2025 budget cuts, will only serve 25. The Council should restore funding so that 100 individuals can be served.

Finally, the past few years have demonstrated what the District can accomplish when we invest in residents’ well-being. Raising revenue by taxing DC’s outsized concentration of wealth would afford DC additional resources to invest in our communities while also helping to correct the racist harm in the tax system.

Two key ways that the Council should look to bring in more revenue is by:

- Taxing capital gains separately from ordinary income and at a higher flat rate of 13 percent, paired with a credit to offset tax increases for families in the bottom 80 percent of incomes.
- Raising property tax rates on homes with a *taxable value* above \$1.5 million, which would impact only 5 percent of homeowners.¹³

The Council Should Add Funds to the Housing Production Trust Fund and Ensure that the Project and Sponsor Based Local Rent Supplement Budget is Sufficient

A proven way to prevent housing displacement is to use District dollars to produce and preserve deeply affordable housing, defined as housing that is affordable for households earning between 0 and 30 percent of area median income (or \$45,650 for a household of four).¹⁴ As of 2020, the District requires by law that 50 percent of HPTF resources support housing for these extremely low-income residents, also known as deeply affordable units. In FY 2023, the Department of Housing and Community Development (DHCD) dedicated 44 percent of funds to deeply affordable units – an improvement since FY 2021 when they allocated just 25 percent of funding to these units – but still falling short.¹⁵

After ten years of allocating at least \$100 million to the HPTF, the mayor’s proposed budget for FY 2025 includes just \$59 million. The DC Council should restore the budget to at least \$100 million to ensure DC does not fall further

behind in tackling the affordable housing crisis. Restoring this funding will also help DC clear its backlogged pipeline, ensuring desperately needed projects in the works can come online.

In past years, shortfalls in the PS LRSP budget have contributed to DHCD's difficulties in meeting the 50 percent requirement. PS LRSP provides the ongoing funding needed to create, sustain, and preserve deeply affordable units. DCFPI asks the Council to ensure the PS LRSP budget is sufficient to meet the needs of projects coming online.

The Council Should Add an Additional \$5 Million to the Housing Preservation Fund

DCFPI also asks the Council to add an additional \$5 million in flexible capital for the HPF. This will cover carrying costs and sustain current preservation projects as they await a path to permanent financing. To ensure that preservation projects have a path to becoming safe, affordable, high-quality housing, the District should set aside at least a quarter of the HPTF allocations specifically for preservation to support the existing loan portfolio, which is crucial for preventing significant loss in affordable housing and resident displacement. This fund is vital for replenishing interest reserves, covering critical repairs, and providing strategic support to ensure the effective utilization of over \$120 million in loans aimed at housing preservation.

The Council Should Allocate Funds to the First Right Purchase Program

Additionally, DCFPI recommends allocating \$30 million for the FRPP, which provides affordable housing to tenants who seek to purchase their building through the Tenant Opportunity to Purchase Act (TOPA). This investment would help create stable homeownership opportunities and build Black and brown wealth. When tenant associations are able to act on their TOPA rights, associations and the developers they choose to work with struggle to find financing to purchase and preserve the buildings as either affordable rental units or as limited equity co-operatives. The District should expand and fund the FRPP, a program that offered many tenants with low and moderate incomes, the majority of whom are Black or brown, their first opportunity for homeownership by providing low-interest loans to tenant groups.

DHCD, the agency that administers FRPP, has not accepted applications for this program in more than five years, and there is no funding for the program in the current budget. As the TOPA study commissioned by the Council recommends, lawmakers should fund and expand FRPP to offer financing to multi-family properties with characteristics that make it hard for tenant associations to find other financing options.¹⁶ These barriers are due to deferred maintenance or high costs of acquisition and renovation that would require a purchaser to significantly raise rents, displacing tenants with low incomes.¹⁷

The Council Should Add Funds to Sustain Public Restrooms

DCFPI urges the Council to add funding to the FY 2025 budget to continue the standalone public restroom pilot. Public restrooms promote racial and economic equity, as a local study found that businesses were more likely to deny access to a restroom to Black non-customers who appeared possibly homeless than white customers who appeared housed.¹⁸ Most residents experiencing homelessness do not have money to make purchases at these establishments to be able to gain access to the restroom.

The law mandating a standalone restroom pilot passed in FY 2019. DC Council allocated funding to the FY 2022 Department of General Services budget to implement the pilot, but the agency failed to do so. Thereafter, the Council added a one-time allotment of \$407,000 to the FY 2024 budget to launch the pilot. The District recently secured a contractor for the pilot but has not yet installed the restrooms. The mayor's proposed FY 2025 budget failed to include recurring funding to continue the pilot, and if the Council does not add an additional \$407,000, the pilot will end in the middle of FY 2025.

Public Restrooms are Fundamental to Human Dignity and Health

Passed unanimously by the Council in 2019, the “Public Restroom Facilities Installation and Promotion Act” mandated the creation of pilot standalone restrooms in the District. The Council recently chose five locations to be included in the pilot, but these restrooms have not been installed yet. Allocating funding in the FY 2025 budget can ensure the piloted restrooms that are successful can continue to operate.

Public restrooms are especially critical for people who are restroom-challenged.¹⁹ When seniors, pregnant women, young children, and people on certain medications have to go, sometimes they have to go urgently. Knowing that there are public restrooms readily accessible, people are more apt to visit parks, ride their bikes, jog, and walk. Easily accessible, clean, safe restrooms make good business sense and help foster tourism.²⁰ As a result, more and more cities are investing in public restrooms.²¹

Residents experiencing homelessness, in particular, stand to benefit from public restroom expansions. The pandemic made restroom access worse, as many downtown businesses closed restrooms that non-customers once were able to use. And even prior to the pandemic, there was evidence that fewer businesses were allowing non-customers to use their restrooms.

For example, in 2015, the People for Fairness Coalition (PFFC) visited 85 businesses in five areas of DC that have high levels of pedestrian traffic and people experiencing homelessness to see if they would allow the general public to access their restrooms. PFFC found that just over half of the businesses allowed anyone to use their restroom.²² One year later, they visited these businesses again and found that ten of these businesses now limited access to individuals who weren’t customers.²³ They also found that businesses discriminated against a PFFC member experiencing homelessness who visited the restrooms. Multiple businesses allowed a white woman who appeared housed to use the restroom but not a Black man who appeared possibly homeless.³

The lack of access to bathrooms is not merely an inconvenience—it can have devastating health and public health consequences. People are encouraged to wash their hands frequently to stop the spread of COVID and other germs. Catherine Crossland of Unity Healthcare has testified about her patients skipping lifesaving blood pressure, heart, and HIV/AIDS medications because they can lead to an urgent need for the restroom.²⁴ Southern California experienced a large Hepatitis A outbreak from 2017 to 2019 because of the lack of toilets and handwashing facilities for residents experiencing homelessness.²⁵ At least 21 people died as a result.²⁶

By increasing access to public restrooms, the District can be a friendlier place for residents with illnesses and disabilities, tourists, children and their caretakers, and residents experiencing homelessness. After years of waiting, restrooms are finally being installed. Continuing funding will fulfill the promise laid out in the Public Restroom Facilities Installation and Promotion Act. I urge the Council to add funding to continue the public restroom pilot. Thank you for the opportunity to submit these comments.

³ The People for Fairness Coalition dressed the tester who was to appear homeless in a large, tattered jacket, a sock hat, and loose slacks. People experiencing homelessness have many looks just as others do.

¹ Metropolitan Washington Council of Governments, [Homelessness in Metropolitan Washington: Results and Analysis from the Annual Point in Time \(PIT\) Count of Persons Experiencing Homelessness](#), May 2023.

² Claire Zippel, [Building the Foundation: A Blueprint for Creating Affordable Housing for DC's Lowest-Income Residents](#), DC Fiscal Policy Institute, April 4, 2018.

³ DC Interagency Council on Homelessness, "[Homeward DC: Strategic Plan 2015-2020](#),"

⁴ National Alliance to End Homelessness, "[Diversion](#)," August 10, 2010.

⁵ DC Deputy Mayor for Planning and Economic Development (DMPED) and DC Department of Housing and Community Development (DHCD), "[Inclusionary Zoning Program 2023-2024 Maximum Income, Rent, and Purchase Price Schedule](#)," Effective July 7, 2023.

⁶ DC Interagency Council on Homelessness, "[Homeward DC 2.0](#)," Accessed December 8, 2022.

⁷ Joint Center for Housing Studies at Harvard University "[The State of the Nation's Housing 2023](#)."

⁸ Ibid.

⁹ Matthew Desmond. *Evicted: Poverty and Profit in the American City*, 2017.

¹⁰ Ibid.

¹¹ Eviction Lab, "[How does an eviction affect someone's life?](#)"

¹² Ibid.

¹³ DC Fiscal Policy Institute, "[The District Can Raise Critically Needed Revenue by Taxing Wealth](#)," February 21, 2024.

¹⁴ DC Deputy Mayor for Planning and Economic Development (DMPED) and DC Department of Housing and Community Development, "[Inclusionary Zoning Program 2023-2024 Maximum Income, Rent, and Purchase Price Schedule](#)," Effective July 7, 2023.

¹⁵ Eliana Golding, "[Groundbreaking Investments in Affordable Housing Should Come With Increased Transparency and Oversight](#)," DC Fiscal Policy Institute, April 26, 2022.

¹⁶ "[Sustaining Affordability: The Role of the Tenant Opportunity to Purchase Act \(TOPA\) in Washington, DC](#)," Coalition for Non-Profit Housing and Economic Development, October 2023.

¹⁷ Ibid.

¹⁸ People for Fairness Coalition, "[Revisiting, One Year Later, Private Facilities in DC That Let Us Use Their Restrooms](#)," January 2017.

¹⁹ People for Fairness Coalition, "[The Restroom Challenged, from the American Restroom Associate website](#)," Accessed March 29, 2022.

²⁰ Mary Beth Quirk, "[The Future of Tourism is Public Toilets](#)," Consumerist, the blog of Consumer Reports, September 5, 2017.

²¹ Sarah Breitenbach, "[Cities Look to Public Restrooms to Clean Up Downtowns, Attract Tourists](#)," Huffington Post, September 5, 2017.

²² People for Fairness Coalition, "[Does Downtown Washington DC Have Restrooms That Are Clean, Safe, and Available to Everyone 24/7](#)," Accessed April 3, 2023.

²³ People for Fairness Coalition, "[Revisiting, One Year Later, Private Facilities in DC That Let Us Use Their Restrooms](#)," January 2017.

²⁴ Catherine Crosland, "[Testimony Regarding B22-223 'Public Restroom Installation and Promotion Act of 2017](#),'" Unity Health Care, January 10, 2018.

²⁵ Anna Gorman, "['Medieval' Diseases Flare as Unsanitary Living Conditions Proliferate](#)," California Healthline, March 12, 2019.

²⁶ Ibid.

MIRIAM'S KITCHEN

From: Lara Pukatch <lara@miriamskitchen.org>

Sent: Tuesday, April 23, 2024 2:17 PM

To: Info, ICH (EOM) <ich.dmhhs@dc.gov>

Subject: comments on the FY25 budget

Hi Theresa,

While I sent these comments on Friday, I just got a notice this morning that they had gone to the wrong email inbox in error. Please see below. Thanks!

Lara

Hello,

Thank you for the opportunity to provide comments on the FY25 proposed budget for DHS. You can find Miriam's Kitchen's comments below. Due to time constraints, we are only able to submit written feedback on a few programs, but look forward to following up with the ICH and DC Council for further discussion and analysis of the Mayor's proposed budget.

Permanent Supportive Housing (PSH):

Permanent supportive housing provides long-term vouchers, case management, and voluntary supportive services to individuals and families not only experiencing chronic homelessness but who would remain at imminent risk of homelessness. PSH is recognized as a best-practice intervention to end chronic homelessness. We are deeply concerned that the Mayor's proposed budget funds NO new permanent housing vouchers of any kind including PSH for families and individuals.

While concerns about implementation have been raised, like the Administration, we are confident that the 400 remaining unmatched vouchers will be matched by the end of Fiscal Year 2024. As such, we believe it is extremely short sighted to use the unmatched and unassigned vouchers as justification for not allocating new vouchers in FY25. With unsheltered homelessness on the rise and the criminalization of tent encampments increasing, a FY25 budget that allocates NO new funding for housing vouchers will leave those most at risk of dying on our streets without housing options.

Implementation has been slow, but during these three years DC has built a system that can comfortably assign 600 individuals a year (and has gone at a pace of 1200 individuals a year when working well). With no vouchers, we'll be telling people on the street in October 2024 that at best I can start you on the road to housing no earlier than October 2025. This is unacceptable. We should be investing as much as we can each fiscal year while simultaneously working to speed up the housing process and addressing the two primary challenges - PSH service providers being able to staff up more quickly (smaller of the two problems) and DCHA being able to speed up with all their processes including rent reasonableness so it doesn't take 6-9 months to go from assignment to lease up.

Rapid Rehousing (RRH) for Individuals:

Rapid re-housing is a time-limited subsidy (up to 12 months) that supports individuals who are currently experiencing homelessness or at risk of homelessness, by providing assistance in both securing housing and

maintaining housing during periods of financial hardship. The DHS rapid housing (RRH) program for singles currently has 600 slots. In 2023, an average of 100 people were referred to RRH per month, with the wait time from referral to RRH match averaging between 3.5 and 4.5 months.

If this rate of referral were to remain consistent, we would see a total average of 1,200 people being referred to RRH per year. With only 600 slots, the program cannot currently meet the demand for RRH. By failing to expand this program to meet the need and then also cutting existing funding, we will increase wait times for rapid rehousing and are sending a clear message that even for those who might be able to resolve their homelessness most quickly, they must remain homeless for the better part of a year before they could even be connected to a short-term housing intervention. We strongly recommend that the Council restores cuts to RRH and considers expanding this program to meet the need.

Homeless Street Outreach – cuts to FY24 funding levels, failure to meet current needs

As of the January 2023 Point-In-Time count, unsheltered homelessness is up 19% from the previous year and is at its highest point since 2017. Approximately \$3.5 million is needed to maintain the current baseline budget for homeless street outreach at FY24 levels. Also, an additional \$2.9 million is needed to:

- make up for outreach capacity lost through the sunset of the CARE pilot, a time-limited initiative to address unsheltered homelessness in tent encampments.
- Add encampment focused outreach in Wards 6, 7, and 8 (where it has not previously existed)
- Address increased outreach needs in specific neighborhoods, such as U street and Georgia Avenue

The mayor's proposed budget includes \$3.7 million for street outreach. While the cut is made due to the disappearance of federal funding, decreasing the number of street outreach case managers currently on the streets at a time when unsheltered homelessness and the criminalization of street homelessness is increasing is woefully shortsighted. As the CARES pilot is still sunsetting, these cuts to the outreach program will result in significantly fewer outreach case managers on the streets, fewer supports and resources for our neighbors living outside and in encampments. We encourage the council to restore funding to FY24 levels and to expand funding further to address increased needs in neighborhood hotspots, as per the recommendations of the Coordinated Street Outreach Network.

Best,

Lara Pukatch

Chief Advocacy Officer

Miriam's Kitchen

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