



Advisory Neighborhood Commission 2A

“Serving the Foggy Bottom and West End communities of Washington, D.C.”

November 28, 2023

Councilmember Robert White
Chair, Committee on Housing
Council of the District of Columbia
1350 Pennsylvania Avenue NW, Suite 107
Washington, DC 20004
rwhite@dccouncil.gov

RE: DC Council Bill B25-0049 – the “Local Rent Supplement Program Eligibility Amendment Act of 2023”

Dear Councilmember White,

At its regular meeting on November 15, 2023, Advisory Neighborhood Commission 2A (“ANC 2A” or “Commission”) considered the above-referenced matter. With six of eight commissioners present, a quorum at a duly-noticed public meeting, the Commission voted unanimously (6-0-0), after a motion made by Commissioner Patel and seconded by Commissioner Malec, to adopt resolution CR-23-004, which reads as follows:

WHEREAS, on January 19, 2023, Chairman Mendelson and Councilmember Pinto introduced the [Local Rent Supplement Program \(LRSP\) Eligibility Amendment of 2023](#)¹, amending the District of Columbia Housing Authority Act of 1999 (“The Authority”) to allow applicants for local rent supplement vouchers to expedite the timeline in being rehoused and remove barriers around consideration,

WHEREAS, in Fiscal Year (FY) 2022, the Council unanimously approved identical language in emergency/temporary legislation to amend eligibility requirements for LRSP,

WHEREAS, the Council unanimously extended the same legislation in June 2023 as emergency/temporary legislation to ensure that no gap will exist while the permanent legislation is being reviewed,

WHEREAS, the LRSP initial and continued eligibility determination process is administered by the District of Columbia Housing Authority (DCHA), which also manages a greater number of federally funded housing subsidies. These federally funded subsidies impose restrictions on eligibility that the LRSP simply does not,

WHEREAS, with the large increases to the Department of Human Services (DHS) Permanent Supportive Housing (PSH) program in FY 2022 and FY 2023, one of the major concerns raised regarding the timely implementation of those resources was

¹ [B25-0049-Introduction.pdf \(dccouncil.gov\)](#)



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the way that obtaining birth certificates, photo IDs, and other LRSP documentation is a barrier for many individuals who have been homeless due to the following:

- ID documents were lost, stolen, thrown away, damaged, or destroyed in encampment evictions, and must be reacquired now before they can complete the LRSP application.
- Applications for birth certificates from other states get held up for a variety of reasons and these sometimes get lost in the mail.
- Appointments and transportation to the Department of Motor Vehicles (DMV) can take half a day, and if a client’s ID has only recently been issued — i.e., within the 180 days prior to submitting with the LRSP application — it will not be accepted.
 - If the picture is too dark, it may not be accepted.
 - There are the individuals we work with whose cases are complicated by misspellings and errors on their original birth certificate, or by sealed adoption records.
 - There are people who do not know their social security numbers, and we have even encountered people who did not know their date of birth.
 - There are scores of individuals who are undocumented who have been experiencing unsheltered homelessness for years, and sometimes decades, with no connections to their countries of origin, or who were born in places that did not keep birth records, preventing any effort to get any sort of official documentation from any authority.

WHEREAS, the LRSP self-certifications regulations put in place have been important in removing these barriers for many individuals,

WHEREAS, this legislation will ensure that DCHA administers the LRSP according to LRSP rules by prohibiting inquiries into eligibility criteria that are not applicable to LRSP, and whose consideration would only serve to improperly exclude or discourage eligible applicants for local rent subsidies,

WHEREAS, the Authority will allow applicants or participants to self-certify any required eligibility, admission, or continued occupancy factors when an applicant cannot easily obtain verification documentation at the time of initial eligibility,

WHEREAS, the Authority will treat the self-certifications as final and remain sufficient for purposes of continued occupancy recertifications,

WHEREAS, the Authority shall not inquire about nor consider for the purposes of eligibility, admission, or continued occupancy, any information about citizenship, immigration status, or prior criminal arrests, convictions, or pending criminal matters,



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WHEREAS, prior to enactment of the emergency/temporary legislation, criminal background and immigration status eligibility was applied differently for tenant-based, sponsor-based, and project-based LRSP,

WHEREAS, this permanent legislation will establish one standard for all types of LRSP thus ending confusion and ending exclusion from the rental subsidy.

WHEREAS, inquiries into citizenship and immigration status can have a chilling effect on applicants, sending the message that they are not welcome to apply for housing subsidies; eliminating such inquiries is an equitable solution in housing subsidy eligibility determinations, and

WHEREAS, inquiries into criminal background do not aid or inform the determination process but disproportionately affect applicants from low income communities and communities of color, just as the criminal legal system disproportionately affects these communities; by disallowing inquiries into the criminal background that can contain inaccuracies, irrelevant information, and a lack of context of applicants, participants can remove an unnecessary barrier to acutely needed affordable housing.

THEREFORE, BE IT RESOLVED that ANC 2A supports the Local Rent Supplement Program Eligibility Amendment of 2023, which would permanently enact emergency and temporary legislation that has facilitated the provision of housing to individuals excluded from federally-funded housing programs by eliminating these barriers and clarifying the scope of DCHA’s inquiry.

BE IT FURTHER RESOLVED that ANC 2A recognizes the LRSP is a lifeline to low-income individuals who need stable housing but might be ineligible for federal rent subsidies due to their immigration status, history with the criminal legal system, or who encounter other obstacles to obtaining official records.

BE IT FURTHER RESOLVED that ANC 2A believes that lowering barriers for DC residents creates opportunities for our most at risk residents, further establishing a city housing policy that is inclusive and supportive of all of its residents.

BE IT FURTHER RESOLVED that ANC 2A echoes the policy recommendations stated by Miriam’s Kitchen to build upon and ensure that LRSP self-certification regulations are successful to ensure three things:

1. That all PSH (permanent supportive housing) clients and PSH providers and case managers are educated about the self-certification options and use them consistently whenever needed.
2. That PSH providers are helping clients to get the required ID documents ahead of future recertification periods when they will be necessary.



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3. That DHS has a plan and budget for using their “DHS Local” funds for whatever small percentage of clients are never able to obtain their required documents, as we do not want difficulty with documents to make anyone homeless again in the future. There is currently a funding stream that does allow individuals without documentation, or who are otherwise deemed ineligible for LRSPs, to be housed. However with self-certification, people can now be housed while that process plays out.

Commissioners Trupti Patel (2A03@anc.dc.gov) and Jim Malec (2A02@anc.dc.gov) are the Commission’s representatives in this matter.

ON BEHALF OF THE COMMISSION.

Sincerely,

Jim Malec
Chairperson