



VIA Email

May 5, 2009

Leila Finucane Edmonds  
Office of the Director  
Department of Housing and Community Development  
1800 MLK Jr. Ave., SE  
Washington, DC 20020

**Re: Comments on Concept Paper for the District of Columbia's Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

Dear Ms. Edmonds,

I am submitting these comments on behalf of the Children's Law Center (CLC). CLC envisions a future for the District of Columbia in which every child has a safe home, a meaningful education and a healthy mind and body. We work toward this vision by providing free legal services to over 1,000 children and families each year and by using the knowledge we gain from representing our clients to advocate for changes in the law. CLC is the largest civil legal services organization in the District of Columbia and the only organization providing comprehensive representation to children.

We are pleased that the District is receiving \$7.49 million in Homelessness Prevention and Rapid Re-Housing Program (HPRP) funding from the federal government through the American Recovery and Reinvestment Act of 2009. Many of the families with whom we work struggle to secure affordable, stable housing and, unfortunately, some face periods of homelessness. We also work with many young people who age out of the child welfare system and struggle to find appropriate housing.

We urge the Department of Housing and Community Development (DHCD) to set aside a portion of these federal funds specifically for families and children involved with DC's child welfare agency (children either at risk of removal from their homes or already removed). While the needs of children and families are addressed in various parts of the Concept paper, we encourage DHCD to partner with the Child and Family Service Agency (CFSA) in a more formal way to specifically address the housing needs of these at-risk families.

HPRP funding can be most effectively leveraged by working in conjunction with CFSA social workers who are already in the field working with the target population. Everyday CFSA social workers are in the community and are among the first to encounter families in dire housing situations; therefore, these social workers are uniquely situated to do



effective homelessness prevention work. HPRP funds can support a partnership between the housing and child welfare community so that CFSA social workers don't just identify housing problems, but are able to access resources to offer solutions and prevent homelessness.

Too many children enter foster care because their family is facing housing problems. Nationally, nearly a third of all children in foster care placement are separated from their families because their parents can't afford safe, decent housing.<sup>1</sup> Here in DC, the number of children entering foster care due to inadequate housing has skyrocketed more than 50 percent in the last year.<sup>2</sup> Removing a child from his or her family is extremely traumatic. While removal may sometimes be necessary when a child is being abused or neglected, no family should be separated because of inadequate housing. We urge you to work with CFSA to use HPRP funds to ensure families receive housing supports so that children are not unnecessarily removed. HPRP funds should also be used to quickly reunify families who have been separated due to lack of appropriate housing. It's better for children and parents to be together for a myriad of reasons; it's also much more cost effective to provide housing supports rather than place a child in an out-of-home placement.<sup>3</sup>

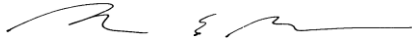
Additionally, youth aging out of foster care are at a very high risk of becoming homeless. Nationally, anywhere from 12 to 35% of youth transitioning out of the system experience homelessness.<sup>4</sup> It is critical that DHCD works closely with CFSA and community groups to ensure HPRP funds are targeted to these youth. Ensuring these youth are housed not only prevents homelessness, it also improves educational, employment and health outcomes.

We urge that DHCD work with CFSA to utilize the HPRP funds in innovative ways to assist families and youth involved with CFSA, including:

- Providing housing search assistance and housing-based case management (such as negotiating with landlords to prevent housing loss or connecting families with legal service attorneys to assist with housing issues);
- Providing short and medium-term rent assistance, security deposits, moving cost assistance and utility payments to keep families and youth housed;
- Providing bridge subsidies for families or youth who have a permanent source of rent assistance identified, but not immediately available (such as a public housing or FUP/Section 8 vouchers);
- Training CFSA social workers in housing resources or funding the salaries of CFSA housing specialists.

Thank you for considering these comments. If you have any questions, please feel free to contact me at (202) 467-4900 ext. 565, or [sgreer@childrenslawcenter.org](mailto:sgreer@childrenslawcenter.org).

Respectfully,



Sharra E. Greer  
Director of Policy

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1 National Center for Housing & Child Welfare, <http://www.nchcw.org/housing/families.aspx>

2 Government of the District of Columbia, Child and Family Services Agency, Implementing the Adoption and Safe Families Amendment Act of 2000 in the District of Columbia (2008 Annual Public Report), at 27, [http://cfsa.dc.gov/cfsa/frames.asp?doc=/cfsa/lib/cfsa/pdf/fy\\_2008\\_annual\\_public\\_report.pdf](http://cfsa.dc.gov/cfsa/frames.asp?doc=/cfsa/lib/cfsa/pdf/fy_2008_annual_public_report.pdf).

3 Nationally, it costs an average of nearly \$48,000 per family when children enter foster care. By contrast, it costs approximately \$15,000 to house one family and provide supportive services for one year. National Center of Housing and Child Welfare, <http://www.nchcw.org/media/home.aspx>

4 Child Welfare League of America, Programs and Resources for Youth Aging Out of Foster Care, <http://www.cwla.org/programs/fostercare/agingoutresources.htm>