
Government of the District of Columbia



Office of the Tenant Advocate

Testimony of

Johanna Shreve
Chief Tenant Advocate

**Bill 23-0391, the “Public Housing Rehabilitation
Oversight Task Force Act of 2019”**

Committee on Housing and Neighborhood Revitalization
The Honorable Anita Bonds, Chairperson
Council of the District of Columbia

Wednesday, October 30, 2019
11:00 a.m.

Room 500
John A. Wilson Building
1350 Pennsylvania Avenue, NW
Washington, DC 20004

Thank you, Chairperson Bonds, for this opportunity to comment on Bill 23-0391, the “Public Housing Rehabilitation Oversight Task Force Act of 2019.” I am Johanna Shreve, Chief Tenant Advocate for the District and Director of the Office of the Tenant Advocate (OTA).

Bill 23-0391 is aimed at developing the best possible policies regarding the rehabilitation of the District’s aging public housing properties. In relevant part, it would (1) establish a “Public Housing Rehabilitation Oversight Task Force” to make oversight, budget, and policy recommendations to the Council, the Mayor, and the D.C. Housing Authority; and (2) without making OTA a member of the Task Force, it would task the OTA with providing administrative support.

The OTA’s role in the Task Force

Chairperson Bonds, I sincerely appreciate the confidence you place in me to help you and the Council achieve your important goals -- both for our stock of affordable rental housing, and for renters generally in the District of Columbia. If asked, however, I would have to respectfully decline this particular request. As you know, the OTA’s core statutory mission was expansive at the time it was created in 2006. That mission has grown over the years to include additional programs such as emergency housing and

the design and creation of a rental clearinghouse database. While I continue to happily assume responsibility for the successful completion of the database, and continue to administer the emergency housing activities, the fact is collectively they do challenge the limited resources of a small agency.

By way of an update on the rental housing database, I can report that the RFP is now closed. A technical evaluation team has been assembled to review the submissions. As we have been anticipating for some time now, I can also report the imminent start of the physical build-out of the agency. The build-out will expand the office to include space adjacent to the space we currently occupy in the Reeves Building.

My concerns about this new statutory responsibility are primarily two-fold. First, the purely administrative role is a new one. It is one that I believe could potentially conflict with the agency's central purpose—to serve as an independent legal, policy, and advocacy voice for District renters. Second, such additional activities at this time could interfere with our focus on each of the balls we currently have in the air.

Moreover, I do not believe it would be difficult to fill this administrative role with a more appropriate candidate. For example, as

happened last year with regard to the Limited-Equity Cooperative Task Force,¹ the Task Force now under consideration could be allowed to retain a third party vendor to perform such administrative tasks.

Accordingly, I respectfully request that the Committee remove the OTA's role from the legislation. Otherwise, I would request an amendment to include appropriate funding and staffing for the agency.

Other concerns

More generally, I have several questions and concerns about the legislation that I would like to refer to the Committee for consideration.

First, the Committee may want to consider further specifying in the legislation the Task Force's main goals and purposes. For example, a priority goal for me would be to prevent the loss of any public housing units, particularly those that accommodate larger families. I know, Chairperson Bonds, that you share this goal.

Here is another example. Is it or should it be a Task Force goal to help to ensure that any further District funding will be leveraged against private dollars to the maximum extent possible? If so, the Committee may want to consider reconfiguring the membership designations to reflect

¹ Law 22-0119, the "Limited-Equity Cooperative Task Force Act of 2018," effective July 3, 2018.

particular areas of knowledge and expertise in the public housing and development finance arena. In addition to Housing Tax Credits and the Housing Production Trust fund, the Task Force's collective knowledge and expertise should cover the full spectrum of investment vehicles and affordability programs, including the New Communities Program and all programs available through the U.S. Department of Housing and Urban Development (HUD).

Second, the Committee may want to consider the relevance of DCHA's draft rehabilitation plan, the "20-Year Transformation Plan." The development of that plan is ongoing and prioritizes the same fourteen properties for which the Council authorized \$24 million in additional capital funding this year. DCHA has also engaged in a series of robust meetings with a stakeholder group regarding their questions and concerns.

Accordingly, as a practical matter, the Committee may want to consider whether the Task Force's relevance will mainly depend on its participation in that existing process? If so what will be the Task Force's "value added"? What role would the Task Force play if, by the time it becomes operational, the Transformation Plan has been approved, or all but approved?

Third, the Committee may want to consider whether it is necessary to include a document and data-access provision. Such a provision may be necessary to ensure that the Task Force has all the information it needs to be as helpful as possible to policy-makers.

Fourth, no mention is made of the role the Task Force will play in relationship to the DCHA Board of Commissioners, which has fiduciary and other responsibilities to the federal government. As of today, my research in preparation for this hearing shows that HUD has already approved the Authority's participation in the Rental Assistance Demonstration (RAD) program for one or more of the public housing projects, for a total of 109 units, which technically removes them from the Public Housing portfolio. A list of the relevant properties is attached to my written testimony.

Additionally, another five (5) projects are scheduled to be approved for RAD in FY 2020, thus removing even more units from public housing and into long-term Section 8 project-based vouchers or assistance housing.

Without the appropriate expertise, it will be difficult for the Task Force to develop the appropriately nuanced reports necessary to provide the Mayor and Council with clarity as they incorporate housing development policies and activities into a comprehensive affordable housing plan for the District.

Conclusion

Again I thank you, Chairperson Bonds and the Committee, for this opportunity to testify, for your strong support for affordable housing in the District, for the confidence you continue to place in me, and for the support you so consistently provide to the OTA. This concludes my testimony and I am happy to answer any questions you may have.

