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Subject: [External] RTFH formal response to LAFCO white paper
Date: Thursday, October 29, 2026 3:51:49 PM
Attachments: [10.29.26 RTFH Formal Response to LAFCO.pdf](#)

Good afternoon, Executive Officer Keene Simonds,

The Regional Task Force on Homelessness (RTFH) and the San Diego City and County CoC 601 support a rigorous examination of how San Diego County organizes and funds its response to homelessness. Clear responsibilities, accessible public information, and reliable regional commitments are essential. We appreciate the work invested in the administrative draft, Homeless Services + Governance in San Diego County, and its recognition of the capacity developed by RTFH and our regional partners.

Our formal written response is attached. We ask that it be included in the record for Item 6a and shared with commissioners before Monday's meeting, and we would appreciate confirmation that you received it. We respectfully request that the Commission continue consideration of Item 6a before accepting the paper as complete or directing its publication in final form. Upon review, we found factual and methodological errors that need correction. We also ask that the paper's conclusion separate two things: the accountability advantages a government agency might offer, and any evidence that changing the lead agency would improve results for people experiencing homelessness. The agenda's Alternative Two provides a way to do that.

I will attend Monday's meeting to answer commissioners' questions. RTFH and the CoC are also glad to work with your team on the corrections and on any deeper research the Commission wants.

Thank you for considering our response.

Respectfully,

Tamera Kohler

Chief Executive Officer

Regional Task Force on Homelessness

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[RTFH Offices are closed every other Friday](#)

Date October 29, 2026

To Chair Kristi Becker and Commissioners
San Diego Local Agency Formation Commission

Re Item 6a, November 2, 2026 meeting: Requested revisions before final acceptance

Dear Chair Becker and Commissioners:

The Regional Task Force on Homelessness (RTFH) and the San Diego City and County CoC 601 support a rigorous examination of how San Diego County organizes and funds its response to homelessness. Clear responsibilities, accessible public information, and reliable regional commitments are essential. We appreciate the work invested in the administrative draft, Homeless Services + Governance in San Diego County, and its recognition of the capacity developed by RTFH and our regional partners.

We request that the Commission continue consideration of Item 6a before accepting the paper as complete or directing its publication in final form. Several factual and methodological errors need correction. We also ask that the paper's conclusion separate two things: the accountability advantages a government agency might offer, and any evidence that changing the lead agency would improve results for people experiencing homelessness. The agenda's Alternative Two provides a means to complete that work. [1]

Correct the history and explain the current structure

The final paper should distinguish RTFH's 1983 origins from the later development of regional CoC leadership. Before 2011, separate City of San Diego and San Diego County CoCs operated in the region. They merged in 2011, as the City's FY2013 Annual Action Plan records. Page 41 also attributes the coordinating role since 1998 to RTFH, whereas a 2015 Housing Commission report assigns it to the Regional Continuum of Care Council (RCCC). The chronology and entity attribution should be corrected. [1, p. 41 and fn. 41; 10-11]

RTFH's understanding is that the City, County and RCCC asked RTFH in 2016 to take on CoC lead-agency responsibilities, with greater operational flexibility and faster decision-making among the benefits considered. Public records establish that RCCC still maintained a separate governance board in 2016, that merger implementation was underway that year, and that the formal RCCC-RTFH merger followed in January 2017. The final paper should distinguish the 2016 decision and transition from the effective merger. [2-4]

The paper's account should also explain the October 2020 separation into nonprofit and CoC boards, intended to clarify their different responsibilities and address potential conflicts. Understanding the sequence and reasons for these changes is necessary to evaluate which concerns were addressed and which remain. [5]

Evaluate the accountability mechanisms that exist

We recognize that governmental and nonprofit bodies operate under different public accountability requirements. The paper appropriately identifies public CoC meetings, HUD monitoring, independent audits, financial disclosures, and conflict safeguards in the existing arrangement. Its conclusions should give these mechanisms appropriate weight and distinguish a potential structural concern from a documented failure. [1, pp. 61-64]

Governmental participation is already part of CoC governance. The current Board includes County Supervisor Terra Lawson-Remer as First Vice Chair, San Diego City Councilmember Joe LaCava, Lemon Grove Mayor Alysson Snow, and Leilani Hines, Oceanside's Director of Housing and Neighborhood Services, in the CDBG Consolidated Plan jurisdiction seat. This public representation on

the CoC Board should be assessed separately from RTFH's corporate board. The membership figures on pages 37-38 should also be reconciled with the current Charter and roster. [6, app. E; 12]

The Charter assigns the CoC Board regional policy, funding-priority, and designation responsibilities, as well as oversight of the lead-agency MOU. The paper should evaluate that agreement and its implementation, identify demonstrated deficiencies, and assess whether clearer deliverables, reporting, or dispute-resolution procedures would address them. It should explain what further public authority each alternative would add. The existence of two boards alone does not demonstrate ineffective accountability. [1, pp. 61, 65, 69; 6, sec. 4.4 and app. F]

Where public materials are difficult to locate, the paper should identify the affected records and periods. We support clear publication standards for agendas, minutes, work plans, financial information, and performance reports, with appropriate protection for confidential information. These improvements deserve consideration within the existing structure.

Correct data definitions and keep conclusions proportionate

The technical descriptions require reconciliation with HUD's definitions. Page 100 presents Measure 1 as time from project entry to a permanent-housing exit, although HUD defines it as length of time homeless, which is not limited to people who exit to housing. Page 102 describes Metric 3.2 as all unique active HMIS clients, whereas HUD defines it as the annual count of sheltered persons in specified project types. Page 19 interprets 100 percent Rapid Re-Housing utilization as independent evidence of demand and performance, without explaining that HUD's inventory method generally makes the reported inventory equal the number housed on the count night. These distinctions affect what the data can support. [7-8]

The paper's conclusion should also reflect its own finding that divided authority does not establish that another model would perform better. The peer examples are informative, but they do not isolate organizational form from differences in funding, legal powers, housing conditions, or service capacity. The paper acknowledges both reasonable performance in San Diego and serious implementation challenges in public models. Those qualifications should remain explicit in the closing assessment. [1, pp. 69-80, 81]

Evaluate decision speed and operational flexibility

The paper recognizes nonprofit operational flexibility on pages 74 and 81, but does not develop a comparable assessment of how quickly each model can make and implement decisions. Its responsiveness criterion emphasizes client voice rather than operational turnaround time. Both criteria deserve evaluation. [1, pp. 59-60, 74, 81]

We request a comparison of approval steps, delegated authority, and expected time for routine and urgent decisions, including funding deadlines, contract adjustments, and approved changes to coordinated entry. The assessment should identify any service consequences of delay and the controls that apply under each model. Speed must be assessed within applicable grant, financial, procurement, privacy, and CoC governance requirements; nonprofit status alone does not establish superior performance.

Separate new authority and resources from organizational form

The paper correctly observes that changing the Collaborative Applicant alone would do little to align local funding without commitments and defined responsibilities. Any future option should specify the powers it would exercise, the governments that would participate, the revenue actually committed, and the approvals needed. It should distinguish existing funds being transferred from additional resources. A new body does not, by its creation alone, secure the participation of every jurisdiction or the funding needed to expand housing and services. [1, pp. 72, 76-79]

Financial comparisons should also use consistent definitions. The discussion on page 42 separates subrecipient expenditures from RTFH's broader program, staffing, and administrative costs; page 64 characterizes the remaining amount as supporting the three core CoC functions. That allocation should be reconciled to financial records before it is used to compare administrative costs or estimate savings.

Include a strengthened current model and protect continuity

The paper identifies improvements available within the current structure. We request that it evaluate a strengthened version of the current model as fully as the alternatives: clear CoC work plans, measurable performance obligations, accessible reporting, defined procedures for resolving disagreements, and stronger jurisdictional funding and service commitments. Apply the same criteria to outcomes, cost, implementation time, decision speed, authority, and participation.

Any later proposal to transfer functions should include a funded continuity plan covering staff, HMIS data stewardship and security, coordinated entry, grant calendars, contracts, provider payments, and participant access. It should preserve meaningful decision-making participation by people with lived experience, service providers, smaller jurisdictions, and the broader CoC membership. The paper itself recognizes the need to preserve existing capacity and weigh disruption against demonstrated benefits. [1, pp. 79-80]

Federal rules and the local Charter distinguish the CoC, its representative board, and its designated administrative entities. Acceptance of an informational paper should not be presented as approval to change those designations, reassign grants, or transfer systems and personnel. Any subsequent proposal must follow the applicable CoC governance, federal and state requirements, and grant and contractual conditions. [6; 9]

Requested Commission action

RTFH and the CoC respectfully request that the Commission continue the item; direct staff to reconcile factual and technical issues with RTFH and the CoC; and return with a revised paper, a written disposition of material comments, and our response included in the record. If the Commission accepts and files the paper on November 2, we ask that it do so subject to those revisions, retain administrative-draft status pending that review, and clarify that acceptance does not endorse a governance replacement.

We are prepared to participate in a substantive discussion of stronger regional accountability. The standard for any change should be the additional capacity, resources, and measurable improvements it delivers for people experiencing homelessness. RTFH's CEO spoke with LAFCO staff on October 12, 2026, while the paper was being prepared. The administrative draft was released on October 26, 2026, one week before the Commission's consideration. Corrections of this scope need more time than that allows, and we ask that the record reflect that input. An accurate record and a fair assessment of the available options will help the Commission and the region make that judgment.

Sincerely,

Tamera Kohler

Chief Executive Officer

Regional Task Force on Homelessness

Akilah Templeton

Board Chair

San Diego City and County CoC 601

Veronica Dela Rosa

Board Chair

Regional Task Force on Homelessness

Source notes

- [1] San Diego LAFCO, Administrative Draft White Paper and agenda report, Item 6a, November 2, 2026. Supplied attachment. [Read source](#)
- [2] City of San Diego, August 18, 2016 RCCC leadership news release, pp. 1-2. [Read source](#)
- [3] Alliance Healthcare Foundation, AHF in the Community - October 2016, published November 8, 2016. Firsthand account of the October 5 merger implementation meeting. [Read source](#)
- [4] County of San Diego, FY2021-2022 Annual Plan draft, p. 7, identifies January 2017; the City's July 13, 2018 HUD youth award news release corroborates the merger year. [Read source](#) | [Additional source](#)
- [5] RTFH Board of Directors webpage, explanation of structure effective October 1, 2020. [Read source](#)
- [6] San Diego CoC Governance Charter, version 11.0, amended June 2026, sections 3.1, 4.4, 4.7 and 4.11; appendices E-F on composition and MOU oversight. [Read source](#)
- [7] HUD System Performance Measure Tables, January 2019, pp. 1 and 3. Measure 1 and Metric 3.2 definitions. [Read source](#)
- [8] HUD Notice CPD-2023-11, section 3.3.4, p. 21. Rapid Re-Housing inventory instructions. [Read source](#)
- [9] 24 CFR Part 578, Subpart B, particularly sections 578.5, 578.7 and 578.9. [Read source](#)
- [10] City of San Diego, FY2013 Annual Action Plan, revised June 27, 2012, printed p. 43 (PDF p. 47). Records the merger of the City and County CoCs in 2011 and their combined application that year. [Read source](#)
- [11] San Diego Housing Commission, report HCR15-058, issued August 18, 2015, p. 2. Attributes the HUD-approved coordinating role since 1998 to RCCC. [Read source](#)
- [12] RTFH, current CoC Board of Directors roster, accessed October 28, 2026. Identifies governmental representatives and their seats. The linked RTFH biography confirms Alysson Snow is Mayor of Lemon Grove. [Read source](#) | [Additional source](#)