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MEMORANDUM

October 30, 2026

TO: Chair Becker and Commissioners

FROM: Priscilla Mumpower, Assistant Executive Officer
Meghan Traynor, Local Government Analyst I

SUBJECT: Staff Response to Comment Letter from RTFH and San Diego CoC | White Paper on Homeless Services + Governance

This memorandum summarizes the principal comments submitted by the Regional Task Force on Homelessness (RTFH) and the San Diego City and County Continuum of Care (CoC) regarding the staff-prepared White Paper on Homeless Services and Governance in San Diego County. It provides staff responses for the Commission's consideration at the voluntary public hearing scheduled for November 2, 2026. Notice of the hearing was published in the San Diego Union-Tribune and posted on the LAFCO website on October 13, 2026. The white paper and accompanying agenda materials were posted on October 26, 2026.

RTFH and the CoC submitted a joint comment letter dated October 29, 2026, requesting a continuance, technical clarifications, additional context, and further governance analysis. Staff considers acceptance and filing of the white paper, subject to clarifications and additional context before final publication, appropriate to complete the current workplan project. Requests for expanded comparative evaluation do not affect the paper's conclusions concerning governance fit or its presentation of alternatives for further consideration. Those requests could inform a proposed scope of work brought to the Commission in December 2026 to evaluate one or more governance alternatives, should the Commission direct that work.

The comment letter is provided as Attachment One. Its principal topics and staff responses follow in the order presented.

1. Additional Context Regarding History and Current Structure

RTFH and the CoC request clarifications distinguishing RTFH's origins from the development of regional CoC leadership, the responsibilities of the Regional Continuum of Care Council, and the 2016 transition from the January 2017 merger. They also requested discussion of the October 2020 separation of the nonprofit and CoC boards and its purpose.

Staff Response: Clarifications will be incorporated before final publication.

Staff will reconcile the chronology and entity references in the "RTFH" profile and associated historical footnote and add context concerning the establishment of separate boards.

2. Evaluate the Accountability Mechanisms That Exist

RTFH and the CoC request broader consideration of existing safeguards, governmental participation on the CoC Board, and the lead-agency memorandum of understanding (MOU). They recommend that conclusions give these safeguards appropriate weight and distinguish potential structural concerns from a documented failure. They also requested reconciliation of membership figures and identification of the records and periods underlying concerns about access to public meeting materials.

Staff Response: Existing coverage will be clarified before final publication; expanded evaluation can be addressed through subsequent Commission-directed work.

The paper addresses governmental and stakeholder participation in "The San Diego CoC" and evaluates audits, HUD monitoring, financial disclosures, and conflict safeguards under the baseline model's "Fiduciary Oversight" and "Public Accountability" criteria. "Governance Observations" also discusses improvements available within the existing structure.

Staff will review membership descriptions against the current Charter and roster, clarify the MOU's role, and identify the basis for statements concerning access to meeting materials. These clarifications can be incorporated before final publication.

Requests for a detailed assessment of MOU implementation and the additional authority afforded by particular alternatives do not materially affect the paper's conclusions. Should the Commission direct further evaluation, the requests could inform a proposed scope of work.

3. Correct Data Definitions and Keep Conclusions Proportionate

RTFH and the CoC request clarification of definitions for HUD System Performance Measure 1, Metric 3.2, and the interpretation of Rapid Re-Housing utilization. Relatedly, they also request (pages 1, 3) that conclusions distinguish potential public accountability advantages from evidence of resulting improved homeless service outcomes.

Staff Response: Technical descriptions and related interpretations will be clarified before final publication; requests for additional comparative analysis would inform a proposed scope of work should the Commission direct further evaluation.

Staff will reconcile the definitions and interpretations in “10 Years of Housing Inventory Count Trends” and Appendix G with HUD reporting requirements and revise discussion as warranted.

The paper evaluates governance fit under seven criteria; it does not seek to establish a causal relationship between organizational form and homelessness outcomes. Its focus is whether governance arrangements align oversight, resources, and capacity with regional needs. “Governance Observations” expressly acknowledges that the existing divided authority does not establish that another model would perform better. More detailed comparisons accounting for differences in regional resources, legal powers, housing conditions, and service capacity could be incorporated into subsequent Commission-directed evaluation.

4. Evaluate Decision Speed and Operational Flexibility

RTFH and the CoC request a comparison of approval steps, delegated authority, and expected timelines for routine and urgent decisions, including the consequences of delay and applicable controls under each alternative governance model. They request that the assessment avoid assuming nonprofit status alone establishes superior performance.

Staff Response: These requests would inform a proposed scope of work should the Commission direct further evaluation.

The paper assesses governance models against seven criteria: Authority, Administrative Capacity, Fiduciary Oversight, Responsiveness to the Homeless Population, Stakeholder Participation, Public Accountability, and Revenue Capacity. It acknowledges operational flexibility but does not provide a detailed comparison of decision timelines.

Should the Commission direct further evaluation, these topics could inform a proposed scope of work presented in December, expanding the analysis beyond the seven criteria applied in the white paper.

5. Separate New Authority and Resources from Organizational Form

RTFH and the CoC request that governance alternatives identify proposed powers, participating governments, committed revenues, and required approvals, distinguishing transferred funding from additional resources. They also requested clarification of the expenditures attributed to RTFH's three core CoC functions.

Staff Response: Financial descriptions will be clarified before publication; requests for further analysis of institutional and funding arrangements would inform a proposed scope of work should the Commission direct further evaluation.

The alternatives' revenue-capacity discussions and "Connecting Local Funding to Regional Needs" recognize that changing the Collaborative Applicant would not itself establish dedicated revenue or shared governmental funding commitments.

Staff will review and, where needed, clarify the consistency between the "RTFH" financial profile and the baseline model's "Revenue Capacity" discussion, particularly the description of approximately \$6.6 million in non-subrecipient expenses.

Requests for detailed examination of proposed powers, participating agencies, committed revenues, and approval requirements do not materially affect the paper's conclusions concerning the potential benefits and limitations of each model. These topics could be incorporated into a subsequent scope of work evaluating one or more governance alternatives, at the Commission's direction.

6. Include a Strengthened Current Model and Protect Continuity

RTFH and the CoC request comparable evaluation of an enhanced existing model and that outcomes, cost, implementation time, decision speed, authority, and participation be evaluated for all models. They additionally request that any potential proposal to transfer functions include a funded continuity plan that preserves meaningful stakeholder participation and compliance with applicable governance, funding, and contractual requirements.

Staff Response: The paper considers a strengthened model; should the Commission direct further evaluation, an enhanced current model could be examined alongside the selected alternatives.

The baseline assessment recognizes RTFH's established capacity, while "Governance Observations" identifies opportunities to strengthen the existing framework and discusses transition risks and stakeholder participation. The paper does not include a detailed implementation or cost analysis of an enhanced current model. Any subsequent proposal to transfer functions would also require closer examination of legal authority, approval requirements, funding, and operational continuity.

These requests for additional analysis do not materially affect the paper's conclusions, which acknowledge both opportunities for improvement within the existing framework and trade-offs associated with structural change. Should the Commission direct further evaluation, an enhanced current model could be examined alongside the selected alternatives.

7. Requested Commission Action

RTFH and the CoC request a continuance along with a revised paper incorporating clarifications and written responses. Alternatively, they request conditional acceptance, retention of administrative-draft status pending review, and clarification that acceptance of the white paper does not endorse a governance replacement.

Staff Response: Staff defers to the Commission on a continuance and recommends acceptance and filing subject to clarifications before final publication.

Staff considers the requested clarifications and additional context compatible with acceptance and filing under Alternative One of Agenda Item No. 6a. Requests for expanded evaluation could be incorporated into subsequent Commission directed work, consistent with that alternative.

Acceptance would not constitute endorsement of a governance replacement or authorize the transfer of functions, grants, systems, or personnel. Further evaluation would provide an opportunity to examine whether one or more alternatives could better align governance with the San Diego region's needs. This memorandum and the attached letter document the comments and staff's responses in the record.

Should the Commission direct additional evaluation, staff could return as early as December 2026 with a proposed scope, schedule, and engagement process for a separate workplan item. Engagement could include RTFH, the CoC, the County, cities, service providers, people with lived experience, and the Commission's Advisory Committees.

Attachment:

- 1) RTFH Written Comment Letter Dated October 29, 2026 with Margin Markings

Blank for Photocopying

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]

Comment
No. 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]

Comment
No. 2

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.

Comment
No. 3

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]

Comment
No. 4

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.

Comment
No. 5

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.

Comment
No. 6

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]

Comment
No. 7

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](#)