

Congress of the United States

House of Representatives

September 03, 2021

The Honorable Marcia L. Fudge
U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410

Secretary Fudge,

First, congratulations on your new role as Secretary of Housing and Urban Development (HUD) and thank you for your recent appearance before the House Financial Services Committee. I look forward to working with you and your staff.

As you may recall, I raised concerns about the lack of oversight and local accountability in HUD's Continuum of Care (CoC) Program. The CoC program is an important part of our homelessness response system. The nationwide network of service providers within the program provides instrumental housing and wraparound care to homeless individuals and families across the country. However, I am concerned that many of the local CoC boards do not have any representation of elected officials or accountability to taxpayers. This leaves many city and county officials out of the decision-making processes for CoC funding that directly affects the safety, livability, and welfare of their citizens. It is my hope that we can work together to improve accountability, transparency, and the success of the CoC network to serve our most vulnerable citizens.

While many CoCs across the country are successfully providing care for homeless individuals and working with a broad range of stakeholders, some CoCs fail to comply with the basic program requirements and fail to provide adequate services to their communities. A Fresno County, California Civil Grand Jury report found CoCs lack accountability for oversight of the various programs and services, as well as a high potential for conflicts of interest in the allocation of homeless dollarsⁱ. Additionally, a report from the California State Auditor's office found CoCs do not always employ best practices related to identifying, planning for, and providing services for those experiencing homelessness, and none of the five CoCs they reviewed has adequately determined whether it has enough service providers to meet the needs of those experiencing homelessnessⁱⁱ.

One thing is clear, whether it's a local school board or Congress, having elected representatives who are accountable to taxpayers drastically improves oversight and accountability; CoC boards are no different. Additionally, CoCs working closely with law enforcement agencies and the judiciary help improve relationships and understanding of the homeless community, reduce recidivism, and help connect homeless individuals with supportive services. For example, in Wichita, Kansas, the head of the Wichita Police Department's homeless outreach team is a member of the Continuum of Care (CoC) Coordinated Entry Workgroup. This

collaborative team has played an important role in helping decrease the overall number of people experiencing chronic homelessness in Wichita, which dropped 72% between 2011 and 2018ⁱⁱⁱ.

We can improve the CoC program nationwide and ensure the responsible use of taxpayer funds by strengthening accountability of CoC boards and empowering local elected officials to better serve our communities. Your response to the following questions will help our office gain a better understanding of HUD's role in caring for homeless individuals.

Questions:

- What procedures and policies does HUD have in place to prevent waste, fraud, and “obvious conflicts of interest” like the ones mentioned in the California Auditor’s report?
- How does HUD plan to prevent and monitor conflicts of interest among CoC boards and who funding is allocated to?
- Regarding the makeup of CoC boards, how many CoC boards have the following members on their board?
 - What CoC boards currently have elected officials on their board?
 - What CoC boards currently have law enforcement officials on their board?
 - What CoC boards currently have representatives from faith-based organizations on their board?
- Would you support revisions to existing statute or rulemaking to improve the makeup of CoC boards?
- How does HUD ensure applicants comply with federal regulations and guidance and implement best practices?
- How often does HUD conduct quality checks on CoCs’ data-collection methodologies?

I look forward to working with your agency to improve the performance of Continuum of Care (CoC) program and the communities we both serve. If you have any additional questions, please don’t hesitate to contact our office.

Sincerely,



Lance Gooden
Member of Congress

ⁱ <http://www.fresno.courts.ca.gov/pdfs/Grand%20Jury%20Reports/REPORT%20No%204%202019-20.pdf>

ⁱⁱ <https://www.auditor.ca.gov/reports/2020-112/summary.html>

ⁱⁱⁱ https://cops.usdoj.gov/html/dispatch/03-2019/wichita_homeless.html