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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

LA ALLIANCE FOR HUMAN  
RIGHTS, et al.

Plaintiff,

v.

CITY OF LOS ANGELES, et al.

Defendant.

Case No. LA CV 20-02291-DOC(KESx)

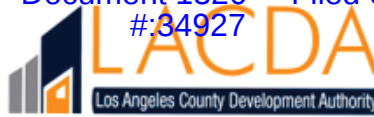
Judge: Hon. David O. Carter

**NOTICE BY SPECIAL MASTER  
RE CORRESPONDENCE FROM  
COUNTY OF LOS ANGELES**

1 I have received this correspondence from the county and I believe that for  
2 transparency purposes it should be docketed.  
3  
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5

6 DATED: July 31, 2026

/s/ Thomas Goethals  
Hon. Thomas Goethals (Ret.)  
Special Master



July 24, 2026

Benjamin Kay, Chair

Los Angeles Continuum of Care Board

## **FORMAL OFFER AND COMMITMENT TO ENSURE CONTINUITY OF LOS ANGELES CONTINUUM OF CARE FUNCTIONS**

Dear Chair Kay and Members of the Los Angeles Continuum of Care Board:

The County of Los Angeles (County) and Los Angeles County Development Authority (LACDA) jointly submit this letter to formally advise the Los Angeles Continuum of Care (LA CoC) Board of their readiness, willingness, and commitment to assume, if designated in accordance with the LA CoC Governance Charter (Charter) and applicable federal requirements, the roles and responsibilities currently performed by the Los Angeles Homeless Services Authority (LAHSA) of: Collaborative Applicant, Homeless Management Information System (HMIS) Lead, and Coordinated Entry System (CES) Management Entity. Specifically, LACDA is willing to assume the role of interim Collaborative Applicant, and the County's Department of Homeless Services and Housing (HSH) is willing to assume the role of interim HMIS Lead and interim CES Management Entity, if designated by the LA CoC membership pursuant to the processes laid out in the LA CoC Charter.

This proposal is solely to protect the ability of the Los Angeles County region to maintain its ability and autonomy to make important decisions regarding over \$240 million in federal funds keeping over 11,000 people housed and to maintain compliant operations of critical LA CoC infrastructure. If needed, these emergency designations would leverage existing CoC priorities, processes, structures, as well as the LA CoC's work already underway for the Fiscal Year (FY) 2026 Notice of Funding Opportunity (NOFO) for the Continuum of Care (CoC) Program, as well as ensure continuity of the administrative functions, performance monitoring, and reporting requirements of CoC Program grants.

### **Commitment to Continuity**

The County and LACDA make this offer in light of the June 11, 2026, notice of immediate suspension issued by the U.S. Department of Housing and Urban Development (HUD) to LAHSA, the pending investigation by the HUD Office of Inspector General, and the related litigation concerning that suspension. The County understands that LAHSA has challenged the suspension in federal court and that a hearing on its motion for preliminary injunction is presently set for August 6, 2026.



lacda.org

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Executive Director: Emilio Salas

Commissioners: Hilda L. Solis, Holly J. Mitchell, Lindsey P. Horvath, Janice Hahn, Kathryn Barger



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The County and LACDA recognize that the outcome of that proceeding may affect LAHSA's ability to continue performing functions on behalf of the LA CoC. Accordingly, the County and LACDA are prepared to provide an immediate continuity solution should the suspension remain in effect or should LAHSA become unable to perform one or more of its delegated functions.

The NOFO process for the FY 2026 CoC Program is already underway. The current uncertainty of the court's ruling creates an urgency to have a contingency plan in place in the event HUD's suspension is upheld. More specifically, the deadline for the FY 2026 HUD CoC Program NOFO is August 26, 2026, providing a very limited window for action on a new Collaborative Applicant should this be needed. LACDA and HSH are providing notice of willingness to assume certain roles assigned to LAHSA to provide the LA CoC with a viable path forward to participate in the NOFO and retain critical funding for the region as well as assuming other critical functions of the homeless system, if LAHSA is ineligible to perform them.

### **LACDA Is Well Qualified to Serve as the Interim Collaborative Applicant**

LACDA is well-positioned and qualified to serve as the interim Collaborative Applicant on a one-time, emergency basis and to immediately assume the responsibilities necessary to preserve continuity of the CoC Program administrative and coordination functions, including those associated with the FY 2026 CoC Program funding cycle. LACDA has the organizational capacity, administrative infrastructure, grant management experience, regional reach, and familiarity with federal funding requirements necessary to immediately step into the role of interim Collaborative Applicant.

Specifically, LACDA has:

- Extensive experience administering HUD grants and programs, including being the largest urban county grantee of the Community Development Block Grant (CDBG) Program in the nation. As part of this role, LACDA has direct oversight to monitor 47 participating cities and numerous non-profits.
- Extensive experience issuing Countywide solicitations for entities that provide housing and services to unhoused populations. For example, LACDA has issued Countywide solicitations to the non-profit developer community for special needs housing and has been awarded over \$1.7 Billion over the past 20 years to develop over 25,000 affordable and special needs housing units countywide.
- Historically undergone CoC Program HUD audits successfully, demonstrating its ability to administer this program.
- LACDA is the convener of the 19 public housing authorities that operate within Los Angeles County to provide regional alignment on housing policies.

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- Received the Distinguished Budget Presentation award and Excellence in Financial Reporting award from the Government Finance Officers Association for 30 consecutive years.
- In addition to CDBG Program funds, the LACDA also administers other federal program such as HOME, Emergency Shelter Grant, CoC, Housing Choice Voucher, Housing Opportunities for Persons With AIDS, Veterans Affairs Supportive Housing, and Emergency Housing Voucher among other federal grant programs and has been designated as a high performer by HUD for 14 consecutive years. LACDA is already a direct recipient of CoC Programs funds through the LA CoC collaborative application process.

LACDA executive leadership has extensive experience with HUD programs spanning the Community Development and Planning and Public and Indian Housing programs and is uniquely qualified to carry out the responsibilities as the collaborative applicant. LACDA further understands that the Collaborative Applicant role carries significant responsibilities, including supporting LA CoC governance, coordinating required CoC planning and application-related activities, maintaining required documentation, supporting compliance with applicable HUD requirements, and facilitating communication and coordination among stakeholders. LACDA is prepared to assume these responsibilities immediately and work collaboratively with HUD, LA CoC members, project applicants, community partners, and other stakeholders to preserve continuity of CoC Program functions and support the effective administration of CoC Program activities during this interim period.

**The County's HSH Department Is Well Qualified to Serve as the Interim HMIS Lead and CES Management Entity**

If LAHSA is unable to serve as the HMIS Lead and CES Management Entity, the County's HSH Department is well-positioned and qualified to serve in these functions on an emergency basis. HSH has the organizational capacity, administrative infrastructure, data system management experience, expertise in CES processes, regional reach, and familiarity with federal requirements necessary to immediately step into the role of interim HMIS Lead and CES Management Entity.

Specifically, HSH has:

- Substantial capacity, as HSH already manages a large portfolio of federal, state, local, and other grants and programs. In FY 2025-26, HSH's total budget was over \$1.5 Billion supporting housing and services across the region.
- Extensive experience administering, integrating, securing, and funding complex data systems, including CHAMP, HMIS, and other administrative data systems. This includes managing enterprise technology contracts, administering IT systems, providing user support and training, negotiating data sharing agreements and memorandum of understandings, and implementing governance practices to

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support secure information sharing across partner agencies. HSH has significant experience managing systems containing highly sensitive client information, including protected health information (HIPAA), substance use disorder records subject to 42 CFR Part 2, domestic violence data, and other confidential information, with established practices for privacy, security, access controls, and regulatory compliance. In FY 2026–27, HSH is funding nearly \$9 Million to support the LA CoC's Point in Time Count and HMIS administration.

- With the largest operational footprint across the CES, HSH funds and provides oversight to supportive services for more than 30,000 people served in Permanent Supportive Housing programs across the region. HSH has extensive experience administering functions integral to the CES implementation and has worked collaboratively with regional partners to improve the CES operations, including the development and implementation of the Housing Acuity Index (HAI) to strengthen prioritization and improve housing matching across the system. In FY 2026-27, HSH funds \$1,056,000 in match for CoC Program CES grants.
- HSH already works with the LA CoC and other regional partners to integrate and publish dashboards on the region's performance towards goals and performance indicators approved through regional homeless governance bodies and is well-positioned to provide additional support to the LA CoC on an interim basis.
- HSH administers funding agreements covering over \$95 Million of Measure A Local Solutions Funds for the cities, Councils of Government, and unincorporated areas throughout Los Angeles County and through its Municipal Relations team fosters regional alignment on funding policies.

The County understands that the interim HMIS Lead and CES Management Entity roles carry significant responsibilities as outlined in the draft LA CoC Charter, including critical aspects of LA CoC governance, subrecipient performance monitoring and reporting, HMIS participation administration and compliance monitoring, CES governance and policy implementation, and other duties assigned by the LA CoC. HSH is prepared to assume these responsibilities immediately on a temporary, emergency basis and work collaboratively with HUD, LA CoC members, service providers, community partners, to support the effective administration of these CoC Program activities during this interim period.

The County and LACDA reiterate their commitment to continuing to work collaboratively with the LA CoC, City of Los Angeles, LAHSA, and the entire region to protect and sustain the vital funding and infrastructure keeping over 11,000 people housed. Should the need arise, both LACDA and HSH stand ready to support an orderly transition and ensure continuity of the LA CoC's essential functions during this unprecedented period. Accordingly, we respectfully request that the LA CoC Board consider this formal offer from the County and LACDA. Both LACDA and County are prepared to provide any additional

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information the LA CoC Board may require evaluating their qualifications, capacity, and readiness to assume these responsibilities.

Respectfully submitted,



SARAH MAHIN  
Director  
Los Angeles County  
Homeless Services and Housing



EMILIO SALAS  
Executive Director  
Los Angeles County Development Authority