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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

LOS ANGELES HOMELESS
SERVICES AUTHORITY, a joint
powers authority,

Plaintiff,

v.

Case No. 2:26-cv-07056 PA (AJRx)

**AMENDED DECLARATION OF
BEVIN KUHN IN SUPPORT OF
PLAINTIFF LOS ANGELES
HOMELESS SERVICES
AUTHORITY'S APPLICATION
FOR PRELIMINARY RELIEF**

1 DONALD J. TRUMP, in his official
2 capacity as President of the United
3 States of America; UNITED STATES
4 DEPARTMENT OF HOUSING AND
5 URBAN DEVELOPMENT; SCOTT
6 TURNER, in his official capacity as the
7 Secretary of the U.S. Department of
8 Housing and Urban Development; and
9 DOES 1-10,

Defendants.

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1 **AMENDED DECLARATION OF BEVIN KUHN**

2 I, Bevin Kuhn, declare as follows:

3 1. I am the Deputy Chief Analytics Officer at the Los Angeles Homeless
4 Services Authority (“LAHSA”). I have worked as the Deputy Chief Analytics
5 Officer since February 2024 and at LAHSA since June 2023. I have personal
6 knowledge of the facts set forth in this declaration based on my role at LAHSA and
7 my direct oversight of the data systems and operations described herein. If called as
8 a witness, I could and would testify competently to all facts stated herein.

9 2. I submit this declaration in support of the above-captioned matter to
10 describe the critical role that LAHSA’s data analysis infrastructure plays in the
11 delivery of homeless services across the Los Angeles region, and the immediate and
12 devastating consequences that would result from the sudden elimination or
13 disruption of those operations.

14 **LAHSA’s Mandate to lead the Continuum of Care**

15 3. As the agency designated by the Continuum of Care (“CoC”) Board to
16 lead HUD’s required CoC functions in the Los Angeles CoC (“LA CoC”), LAHSA
17 is responsible for coordinating the region’s joint application for federal funding as
18 well as supporting a regional approach to data, planning, and strategy across most of
19 LA County, one of the largest CoCs in the United States. The CoC program is
20 governed by the McKinney-Vento Homeless Assistance Act, as amended by the
21 Homeless Emergency Assistance and Rapid Transition to Housing (“HEARTH”)
22 Act of 2009, 42 U.S.C. § 11360 et seq., and implemented through regulations set
23 forth at 24 C.F.R. § 578.

24 4. LAHSA carries out three primary functions as the agency tasked with
25 CoC functions: (1) administering and applying for federal, state, and local funding
26 for homeless services across Los Angeles County; (2) operating as the HMIS Lead
27 for the LA CoC, responsible for maintaining the region’s Homeless Management
28 Information System (“HMIS”); and (3) serving as the Coordinated Entry System

1 (“CES”) Coordinator, responsible for hosting and facilitating the LA CES Policy
2 Council, which sets coordinated entry policy for the region.

3 5. All of these three functions rely upon LAHSA’s data infrastructure to
4 varying degrees and any disruption to the data infrastructure will result in immediate
5 and devastating consequences to all three functions and to all of the agencies,
6 entities, and individuals they serve. This declaration focuses on LAHSA’s role in
7 data management for HMIS and CES.

8 **The Scale of the Populations LAHSA Currently Serves**

9 6. The human stakes of LAHSA’s data infrastructure are reflected in the
10 populations it currently serves. As of the date of this declaration, federal funding
11 administered through LAHSA is currently housing, sheltering, or serving 11,423
12 people across 7,545 households.. These are not abstract numbers — they represent
13 real individuals whose continued access to housing and services depends entirely on
14 the data infrastructure described in this declaration. A true and correct copy of
15 LAHSA’s Homepage, detailing these statistics, is attached herein as Exhibit 1
16 [<https://www.lahsa.org/>].

17 7. Within those households, the populations served include among the
18 most vulnerable members of our community: 1,923 children; 823 transition-aged
19 youth between the ages of 18 and 24; 1,627 seniors; 901 individuals in families
20 impacted by intimate partner violence; and 89 veterans.

21 8. Of the 7,545 federally funded households, 6,221 are housed in
22 Permanent Supportive Housing and 1,324 are in other programs, comprising 1,030
23 family households and 6,510 non-family households.

24 9. The demographic profile of those served further underscores the equity
25 dimensions of this infrastructure. By age, adults comprise 58% of the served
26 population, children 20%, seniors 14%, and youth 7%. By gender, the population is
27 split nearly evenly, with 50% identifying as man or boy, 49% as woman or girl, and
28 1% as transgender, non-binary, or other.

10. Every one of these individuals’ access to housing — and every data point that tracks their progress toward stability — flows through the HMIS and CES infrastructure that LAHSA operates and maintains.

The Critical Role of LAHSA’s Data Analysis Infrastructure

11. At the core of LAHSA’s ability to fulfill each of its functions is its data analysis infrastructure. As LAHSA’s HMIS Policies and Procedures state, “[t]o end homelessness, a community must know the scope of the problem, the characteristics of those who find themselves experiencing homelessness, and understand what is working in their community and what is not. Reliable data enables a community to work confidently towards its goals as it measures outputs, outcomes, and impacts.” Attached hereto as Exhibit 2 is a true and correct copy of the LA HMIS Collaborative Policies and Procedures Manual (the “HMIS Policies and Procedures”), which governs the operation of the LA HMIS system described in this declaration.

12. LAHSA’s data team provides the operational backbone for every aspect of the CoC’s work: managing HMIS, which is the federally mandated database connecting program participants to housing and services; operationalizing the Coordinated Entry System, through which individuals experiencing homelessness are identified, assessed, prioritized, and matched to available housing resources; generating the congressionally mandated federal reports upon which HUD, state agencies, and Congress rely to understand homelessness and allocate resources; and maintaining the data quality standards that are a prerequisite for continued federal and state funding.

13. Absent this data infrastructure, the system does not just slow down, it collapses. Every element of the service delivery network, from frontline street outreach workers to case managers to housing developers, depends on the data systems LAHSA maintains and the specialized staff who operate them.

The Devastating Impact of an Immediate Shutdown

14. The following are immediate impacts that would occur if LAHSA's data analysis department were immediately shut down:

- a. **Immediate disruption to housing access.** Individuals experiencing homelessness cannot be connected to permanent housing through the CES without a completed CES assessment and an active enrollment in a CES participating program in HMIS. An immediate shutdown would freeze the housing matching process entirely, leaving 25,398 households currently on the waitlist for permanent housing (as of June 24, 2026) with no pathway forward. These households consist of 4,084 senior households, 1,200 family households, 852 youth households, and 498 veteran households. Attached hereto is Exhibit 3, a true and correct copy of "Impacts of Federal Funding Cuts to the Los Angeles Homeless Services System."
- b. **Loss of federal reporting compliance.** Federal law requires LAHSA to submit congressionally mandated reports on a defined cycle. *See* 42 U.S.C. § 11386-388 (requiring submission of the Annual Homeless Assessment Report). Missing submission deadlines results in lost points on federal grant applications, jeopardizing the region's access to hundreds of millions of dollars in HUD CoC Program funding.
- c. **Collapse of the service provider network.** HMIS currently supports approximately 400 agencies and 7,770 individual users — including street outreach workers, case managers, social workers, and administrative staff employed by community-based service providers, as well as city and county agencies such as the Los Angeles County Department of Mental Health and the Los Angeles County Department of Housing and Homeless Services. These users rely on LAHSA's specialized team for system administration, training, technical support,

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data quality oversight, and workflow management. Without this team, service providers would have no support for the system they depend on daily. A shutdown of LAHSA’s HMIS operations would effectively terminate access for all 400 participating agencies, cutting off the entire network simultaneously. Without access to HMIS, these participating agencies would not be able to enter data to support federal reporting requirements such as their contractual Annual Performance Reports (APR) and system-wide reporting such as the Longitudinal Systems Analysis (LSA), System Performance Measures (SPM), Housing Inventory Count (HIC), and Point-in-Time Count (PIT).

d. **Inability to transfer operations.** HMIS administration requires highly specialized skills that cannot be acquired or transferred on short notice. There is no entity positioned to absorb LAHSA’s HMIS operations without a substantial transition period, and no such transition has been planned.

e. **State funding consequences.** The State of California requires HMIS participation as a condition of receiving state homeless services funding. *See* Assembly Bill 977. The loss of LAHSA’s HMIS operations would jeopardize not only federal funding but state funding streams that support interim and permanent housing programs throughout the region.

THE HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

Regulatory Background and LAHSA’s Role as HMIS Lead

15. Federal regulations require every CoC to designate a single entity to serve as its “HMIS Lead.” *See* 24 C.F.R. § 578.7(b); Exhibit 2, Background. The HMIS is “an online database used by organizations that provide services to persons experiencing homelessness or are at-risk of homelessness. It records demographic

1 and service usage data and produces an unduplicated count of the people using those
2 services.” (Exhibit 2, Background.)

3 16. HMIS not only integrates with HUD, but “is now used by the federal
4 partners and their respective programs in an effort to end homelessness, which
5 includes “the U.S. Department of Health and Human Services (SAMHSA PATH
6 Program and the Family and Youth Services Bureau Runaway and Homeless Youth
7 Program) and the U.S. Department of Veterans Affairs (Supportive Services for
8 Veteran Families Program).” (Exhibit 2, Background.)

9 17. LAHSA serves as the HMIS Lead for the LA CoC. Critically, LAHSA
10 holds a dual role that goes beyond that of a standard HMIS Lead. “LAHSA is also
11 the HMIS implementation manager for the LA HMIS implementation as a whole.”
12 (Exhibit 2, Contact Information.) This dual role — as both CoC-level HMIS Lead
13 and system-wide Implementation Manager — makes LAHSA’s position uniquely
14 irreplaceable in the regional infrastructure. This will not only affect the LA CoC, but
15 also the Glendale, Pasadena and Long Beach CoCs.

16 18. The HMIS Lead’s responsibilities as prescribed by LAHSA’s HMIS
17 Policies and Procedures include, among other things:

- 18 a. “[s]ubmission of annual HMIS application to HUD;
- 19 b. [r]eceipt and management of HMIS CoC grant;
- 20 c. [s]ubmission of annual HMIS APR;
- 21 d. [s]ubmission of required annual federal reports for CoCs;
- 22 e. [m]anagement of the CoC’s policy for collection of agency/end user
- 23 fees;
- 24 f. [e]ntering into HMIS system administration MOU or service contract
- 25 (as applicable);
- 26 g. [r]eview of CoC-level and project-level data quality benchmarks for
- 27 timeliness, completeness, accuracy, and consistency;
- 28

- h. [c]onduct monitoring of end users to ensure compliance with HMIS plans, policies, and procedures;
 - i. [c]ollaborate with the LA HMIS Collaborative to develop forms and documents as needed;
 - j. [and e]nsure the training needs of HMIS End Users ('Users') are met, in collaboration with the LA HMIS Implementation Manager."
- (Exhibit 2, § 1.3.)

19. In addition, HMIS Leads are responsible for:

- a. "[m]anaging project setup tasks;
- b. [e]stablishing and managing data entry workflows, features, and functionality;
- c. [p]roviding troubleshooting/technical assistance via service desk activities and other modalities;
- d. [p]reparing federal, state, and local reports, including managing data quality cleanup activities necessary to ensure accuracy of reporting;
- e. [and] [m]erging duplicate client records." (Exhibit 2, § 1.3.)

20. As Implementation Manager for the entire LA HMIS system, LAHSA's responsibilities extend further, and include:

- a. "[c]oordinating with the HMIS vendor to ensure LA HMIS maintains operational functionality for all participating CoCs;
- b. [r]equesting vendor upgrades or customizations when needed;
- c. [r]eviewing updates to HMIS software related to the HMIS Data Standards for correctness and completeness;
- d. [d]eveloping shared forms and documents as needed; [and]
- e. [d]eveloping HMIS training materials, training new HMIS end users, and offering refresher/retraining opportunities as outlined in the HMIS training plan for HMIS Participating Organizations that operate within

1 any CoC holding a separate training agreement with LAHSA.”
2 (Exhibit 2, § 1.4.)

3 21. The LA CoC’s HMIS encompasses four sub-CoCs within the greater
4 Los Angeles region: the Los Angeles CoC administered by LAHSA (CA-600), the
5 Long Beach CoC (CA-606), the Pasadena CoC (CA-607), and the Glendale CoC
6 (CA-612). While each sub-CoC participates in the shared HMIS, LAHSA assumes
7 the primary administrative role for the database as a whole.

8 **Scale and Scope of the LA CoC HMIS**

9 22. The LA CoC HMIS is the largest HMIS in the United States. As noted
10 above, it currently includes approximately 400 participating agencies and
11 approximately 7,770 individual users. At any given time, HMIS contains active
12 profiles for approximately 175,000 program participants with 250,000 program
13 enrollments— including individuals currently experiencing homelessness and those
14 formerly experiencing homelessness who remain engaged in services or housing
15 programs. This database is the foundation upon which all housing placements and
16 service connections for the 11,423 people currently housed, sheltered, or served with
17 federal funding have been built and are maintained.

18 23. By way of comparison, the second-largest HMIS using the same
19 vendor, Bitfocus — serving almost the entire State of Washington — has
20 approximately 4,000 users. The scope of the LA CoC HMIS is not merely large; it is
21 without parallel in the country. Additionally, 55% of all homeless data that goes to
22 the State of California comes from LA CoC alone.

23 24. The total budget for HMIS operations is approximately \$12 million.
24 HUD contributes approximately \$2.8 million toward HMIS through the CoC
25 Program Notice of Funding Opportunity (“NOFO”), Federal ESG funding
26 contributes an additional \$442 thousand and the County and City of Los Angeles
27 provide the majority of remaining funding. The costs reflect the extraordinary scale
28 and complexity of operating a database of this size.

1 **HMIS as a Prerequisite for Housing and Services**

2 25. HMIS is not a supplemental data repository. It is the operational
3 infrastructure through which homeless services are delivered and through which
4 individuals experiencing homelessness access housing. Under HUD's CoC Program
5 regulations, recipients and subrecipients are required to use HMIS to record client
6 data and report on program performance. *See* 24 C.F.R. § 578.7(b); 24 C.F.R.
7 § 578.103.

8 26. Case managers must use HMIS to enroll clients in programs, upload
9 required identification and documentation, and complete housing assessments. If a
10 client's profile or documentation is not current in HMIS, that individual cannot be
11 placed in housing through Coordinated entry, regardless of their eligibility or need.
12 *See* CES Permanent Supportive Housing Prioritization and Matching Guidance,
13 available at [https://www.lahsa.org/documents?id=7658-ces-psh-prioritization-and-](https://www.lahsa.org/documents?id=7658-ces-psh-prioritization-and-matching-guidance-approved-10-25-23-)
14 [matching-guidance-approved-10-25-23-](https://www.lahsa.org/documents?id=7658-ces-psh-prioritization-and-matching-guidance-approved-10-25-23-), a true and correct copy of which is
15 attached hereto as Exhibit 4.

16 27. Approximately 85-87 percent of all interim housing in the Los Angeles
17 region is tracked and managed within HMIS. *See* 2025 Housing Inventory Count
18 (HIC) - Los Angeles Continuum of Care (CoC) Revised October 2025, available at,
19 <https://www.lahsa.org/documents?id=9369-housing-inventory-count-hic->, a true
20 and correct copy of which is attached hereto as Exhibit 5. The remaining 15 to 13
21 percent consists primarily of LA County and faith-based system users who are not
22 subject to the same reporting requirements. *Id.* For the overwhelming majority of
23 individuals experiencing homelessness in Los Angeles, access to interim housing
24 and permanent housing is mediated entirely through HMIS.

25 **LAHSA's HMIS Operations and Staffing**

26 28. LAHSA employs a team of approximately 50 specialized staff to
27 administer HMIS and its related functions. These staff perform functions across
28 three distinct operational areas:

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- 1 a. **System Administration.** This team is responsible for building and
- 2 maintaining the technical infrastructure of HMIS, including
- 3 establishing and closing out programs, building forms and assessments,
- 4 designing workflows for new housing initiatives and other programs,
- 5 and configuring the system to accommodate new funding and program
- 6 requirements. (Exhibit 2, § 1.3.)
- 7 b. **User Support.** LAHSA receives approximately 22,725 support tickets
- 8 per year from HMIS users across the region through our ticketing
- 9 service. *See* Data Analytics & Training Department Freshservice
- 10 Ticketing Weekly Executive Summary: Reporting Period: June 17,
- 11 2026 – June 23, 2026, a true and correct copy of which is attached
- 12 hereto as Exhibit 6. These range from password resets and account
- 13 access issues to complex data entry and workflow questions. The team
- 14 is responsible for resolving and triaging these tickets.
- 15 c. **Data Quality.** A team of approximately five specialists is responsible
- 16 for monitoring and maintaining the integrity of data entered across the
- 17 system and implementing the Data Quality and Monitoring Plan,
- 18 *available at* [https://www.lahsa.org/documents?id=9472-data-quality-](https://www.lahsa.org/documents?id=9472-data-quality-monitoring-plan.pdf)
- 19 [monitoring-plan.pdf](https://www.lahsa.org/documents?id=9472-data-quality-monitoring-plan.pdf), a true and correct copy of which is attached hereto
- 20 as Exhibit 7. LAHSA’s HMIS Policies and Procedures define data
- 21 quality as encompassing four dimensions: “[d]ata quality refers to the
- 22 timeliness, completeness, accuracy, and consistency of information
- 23 collected and reported in the LA HMIS.” (Exhibit 2, § 5.1.) HUD and
- 24 the State of California have specific data field requirements, and
- 25 inaccurate or incomplete data directly impairs both federal reporting
- 26 compliance and the ability to connect individuals to housing. Data
- 27 quality staff ensure that both HUD and local data standards are adhered
- 28 to and work with program staff to provide technical assistance to

1 providers as needed. For example, the Data Integrity team, along with
2 the program team, monitor whether providers are accurately recording
3 bed stays in the inventory module (which maps all LAHSA
4 administered interim housing beds in the system).

5 d. **Training Team.** The training team is responsible for developing and
6 rolling out all training needs for the CoC related to HMIS, CES
7 assessments and core service delivery topics, to ensure an integrated
8 training approach for end users and maximum efficiency in building
9 and delivering training to the homeless response system overall. This
10 team has developed learning paths for all system components, conducts
11 in person and virtual training, manages the Centralized Training
12 Academy and Knowledge base where all providers go for support and
13 to access HMIS, CES, and component-specific training resources.

14 e. **Data Analytics and Reporting.** Data Reporting completes all federal,
15 state and local reporting requirements. They also develop and maintain
16 public and provider facing dashboards used to support day-to-day
17 service delivery functions, performance management, and reporting.
18 The team also supports all HMIS import and data integration work and
19 manages the reporting database infrastructure, which ensures reports
20 and dashboards can leverage HMIS data, CES inventory and matching
21 data, VA data, and other system data.

22 f. **App Development.** The App Development & Support team oversees
23 the strategic direction and coordination of HMIS-related web
24 applications, ensuring CoC alignment through architecture planning
25 and stakeholder collaboration. The team designs, builds, maintains and
26 enhances custom apps like LA-HOP, HIC, RMS and UHA, handling
27 front-end and back-end.
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1 29. The level of expertise required to administer HMIS and its associated
2 activities at this scale is substantial. I hired an HMIS Manager in July of last year,
3 and it has taken eleven months for that individual to reach full operational
4 proficiency. LAHSA's own HMIS Policies and Procedures reflect the complexity of
5 this onboarding regular users: newly approved users must complete training
6 prerequisites, sign security agreements, and demonstrate system proficiency before
7 receiving access credentials. (*See* Exhibit 2, App. I (HMIS Access Policy).)
8 Administration of the HMIS also requires not only expert knowledge of the HUD
9 HMIS data standards and regulations, but also local custom workflows and data
10 elements (of which there are thousands in Los Angeles). There is also unique
11 expertise required to be able to run, troubleshoot, and ensure the accuracy of HUD
12 federal reporting requirements (including LSA, SPM, HIC/PIT, and others, defined
13 below.), especially for a community the size of Los Angeles where there are
14 thousands of records to troubleshoot. There is no talent pool from which an
15 equivalent team could be rapidly assembled or to which LAHSA's HMIS operations
16 could be immediately transferred. Running an HMIS of this complexity is a highly
17 specialized skillset that takes years to develop.

18 **Federally Mandated Reporting Requirements**

19 30. Federal law requires LAHSA, as the HMIS Lead for the LA CoC, to
20 submit several congressionally mandated reports to HUD on a defined annual cycle.
21 *See* 42 U.S.C. § 11386; 24 C.F.R. § 578.7(b); 24 C.F.R. § 578.103; *see also* Exhibit
22 2, § 1.3. These reports include:

23 a. **Housing Inventory Count ("HIC").** The HIC is a point-in-time
24 inventory of all permanent housing, transitional housing, and
25 emergency shelter beds and units within the CoC. *See* 24 C.F.R. §
26 578.7(c)(1). LAHSA is currently in an active HIC reporting cycle. The
27 data was submitted to HUD on May 14, 2026 with an approved
28 extension. *See* April 30, 2026 Email from B. Kuhn to

1 aaq@hudexchange.info re RE: Question Response for HDX Question
2 ID 259907 - HUD Exchange Ask A Question, a true and correct copy
3 of which is attached hereto as Exhibit 8. LAHSA is currently awaiting
4 flag resolution (a process discussed further below), from HUD. *See*
5 HIC Submission report from HUD HDX, a true and correct copy of
6 which is attached hereto as Exhibit 9.

7 b. **Point-in-Time Count (“PIT”).** The PIT count is a one-night census of
8 all individuals experiencing homelessness — both sheltered and
9 unsheltered — within the CoC’s geographic area. *See* 24 C.F.R.
10 § 578.7(c)(2). The PIT count is conducted annually and its results are
11 reported through HMIS.

12 c. **System Performance Measures (“SPM”).** The SPMs are a set of
13 HUD-developed metrics used to assess CoC performance, including the
14 average length of time individuals experience homelessness, the rate at
15 which individuals return to homelessness after being housed, and the
16 rate of housing placement. These measures are generated entirely from
17 HMIS data.

18 d. **Longitudinal System Analysis (“LSA”).** The LSA is an annual data
19 submission to HUD that tracks individuals’ pathways through the
20 homeless services system over time, enabling longitudinal analysis of
21 system performance at the national level.

22 31. Three of these reports feed into the Annual Homeless Assessment
23 Report (“AHAR”). As LAHSA’s HMIS Policies and Procedures state, “[t]he Annual
24 Homeless Assessment Report (AHAR) is HUD’s annual report that provides
25 Congress with detailed data on individuals and households experiencing
26 homelessness across the country each year. This report could not be written if
27 communities were not able to provide HUD with reliable, aggregate data on the
28 clients they serve.” (Exhibit 2, Background.) LAHSA submits the aforementioned

1 reports to HUD, which informs the AHAR and transmits it to Congress pursuant to
2 42 U.S.C. § 11386. The AHAR is Congress's primary mechanism for understanding
3 the scope and nature of homelessness across the United States and for informing
4 federal homeless services policy and appropriations.

5 32. Failure to meet HUD's submission deadlines for any of these reports
6 has direct and material funding consequences. Under HUD's CoC Program Notice
7 of Funding Opportunity, a CoC's compliance with HMIS reporting requirements is
8 scored as part of the competitive grant review process. *See* 24 C.F.R. § 578. A
9 failure to submit or late submission results in a reduction in the CoC's score, which
10 directly reduces the region's federal homeless services funding for the following
11 grant cycle. Given the scale of HUD CoC Program funding received by the LA
12 CoC, even a marginal reduction in competitive score could result in the loss of
13 millions of dollars in annual funding.

14 33. Following each data submission, HUD's Technical Assistance ("TA")
15 providers review the uploaded data and issue flags requiring explanation or
16 correction. LAHSA's data team is responsible for clearing those flags by verifying
17 the underlying data — including, where necessary, reaching out directly to housing
18 providers to confirm bed counts, occupancy rates, and program information. These
19 flags are tracked internally at LAHSA and reported to the LAHSA Commission and
20 CES Policy Council. HUD issues formal close-out notices upon successful
21 resolution of all flags. [*See, e.g.,* LAHSA Federal Reporting submission Timelines
22 attachment, a true and correct copy of which is attached hereto as Exhibit 10.

23 34. If LAHSA's data analysis department were eliminated, there would be
24 no staff to prepare, submit, or troubleshoot any of the federally mandated reports
25 described above. An immediate shutdown would place the LA CoC out of
26 compliance with its federal reporting obligations, jeopardizing its eligibility for
27 HUD CoC Program funding and its performance score on future competitive grant
28 applications, with cascading consequences across the entire regional homeless

1 services system. In other words, federal funding would be at risk from every single
2 agency, provider, and municipality in the Los Angeles region.

3 **THE COORDINATED ENTRY SYSTEM (CES)**

4 **Regulatory Background and LAHSA's Role as CES Coordinator**

5 35. Federal regulations require every CoC to establish and operate a
6 coordinated entry system ("CES") as a condition of CoC Program participation. *See*
7 24 C.F.R. § 578.7. Coordinated entry is defined by HUD as a process that provides a
8 standardized, centralized approach to identifying, assessing, prioritizing, and
9 connecting individuals and families experiencing homelessness to housing and
10 services. *See* 24 C.F.R. § 578.3 (definition of "coordinated assessment system"); *see*
11 *also* U.S. Dept' of Housing & Urban Dev., Notice CPD-17-01, *Notice Establishing*
12 *Additional Requirements for a Continuum of Care Centralized or Coordinated*
13 *Assessment System* (Jan. 23, 2017). LAHSA's HMIS Policies and Procedures
14 specifically identify coordinated entry as one of the core components of the LA
15 HMIS software system. *See* Exhibit 2, LA HMIS Software (listing LA HMIS
16 components, including "[c]oordinated entry").

17 36. LAHSA serves as the CES Coordinator for the LA CoC. In this
18 capacity, LAHSA hosts and facilitates the LA CES Policy Council, which is the
19 governing body responsible for setting coordinated entry policy across the region.
20 The fundamental goal of CES is to ensure that individuals and families experiencing
21 homelessness are identified, assessed for need and eligibility, prioritized based on
22 acuity, and matched to the most appropriate available housing resource in a fair,
23 transparent, and data-driven manner.

24 **How CES Operates**

25 37. CES operates through two integrated data systems that function in
26 tandem: HMIS, which contains client profiles and assessment data, and the
27 Resource Management System ("RMS"), which is a separate database that houses
28 the inventory of available housing resources across the LA CoC. Housing matches

1 are generated by drawing data from both systems simultaneously. CES cannot
2 function without HMIS. The two systems are integrated by design, and the loss of
3 either renders the other inoperable for matching purposes. Further, the RMS
4 database is proprietary which means that only LAHSA knows how to operate it;
5 there is no intermediate vendor where someone else may theoretically take over the
6 contract.

7 38. An individual's entry into the CES process begins in the field, typically
8 through contact with a street outreach worker. The outreach worker helps
9 participants fill out the appropriate CES Assessment depending on their household's
10 needs. Adults complete the Los Angeles Homeless Assessment Tool ("LA HAT"),
11 families complete the CES for Families Assessment ("VI-FSPDAT"), and youth
12 complete the CES for Youth Assessment ("Next Step Tool") which are the
13 standardized assessment instruments used to determine an individual's eligibility for
14 permanent housing. The CES Assessments are exclusively administered through
15 HMIS. Without an active HMIS enrollment in a CES participating program or in
16 CHAMP or a DMH program and a completed CES Assessment, an individual
17 cannot be matched to a housing resource through CES. Additionally, in order to be
18 prioritized for permanent housing a participant must be document ready meaning
19 they have an SSN and ID uploaded into HMIS.

20 39. Data recorded in CES assessments and eligible program enrollments
21 also determines what type of housing is most appropriate given their needs. This
22 information, including eligibility for specific housing unit requirements like
23 disabilities and household size, must also remain accurate and up to date for the
24 matching system to function properly.

25 40. When a housing resource becomes available — whether through a new
26 development coming online, a unit vacancy, or new funding — that resource is
27 entered into the RMS with its specific eligibility criteria, including unit size,
28 proximity requirements, target population restrictions, and funder-specific

1 requirements. A pool of eligible individuals is then generated from HMIS based on
2 those criteria. From that pool, individuals are prioritized and ranked based on factors
3 including length of homelessness, acuity of need, and geographic proximity to the
4 resource. The highest-ranked eligible individual or family is then offered the
5 housing opportunity.

6 41. Upon being matched to a housing resource, the individual or family
7 completes a Universal Housing Application, a standardized application form that is
8 consistent across all housing programs regardless of funder. The information from
9 that application is transmitted to the relevant housing authority or provider. This
10 standardized application process is a critical equity mechanism, ensuring that all
11 individuals in the CES process are evaluated on the same terms.

12 42. Currently, there are approximately 25,398 households waiting for
13 permanent housing through the LA CES. Every placement decision for every one of
14 those households is dependent on the data infrastructure described herein —
15 specifically, the integration of HMIS client data with the RMS housing inventory,
16 managed and maintained by LAHSA's data team. Among those awaiting placement
17 are families with children, seniors, survivors of domestic violence, and veterans.

18 **The Consequences of a CES Shutdown**

19 43. CES is not a program that can be paused and restarted. It is a
20 continuous, real-time matching process upon which thousands of housing
21 placements depend each year. If the data infrastructure supporting CES were
22 disrupted or eliminated, the immediate consequences would include:

- 23 a. **Complete cessation of housing matching.** Without active HMIS
24 operations and the integration between HMIS and RMS, no new
25 housing matches can be generated. The approximately 25,398
26 individuals on the permanent housing waitlist would remain in
27 homelessness with no mechanism for placement.
28

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- 1 b. **Loss of assessment capacity.** Without HMIS, outreach workers,
- 2 mental health providers and interim housing providers cannot
- 3 administer the CES assessments. Individuals newly experiencing
- 4 homelessness would have no way to enter the CES process and access
- 5 the housing queue.
- 6 c. **Loss of housing inventory management.** Without the RMS and its
- 7 integration with HMIS, available housing units cannot be matched to
- 8 eligible individuals. Vacant affordable housing units could go unfilled
- 9 while thousands of individuals remain on the streets.
- 10 d. **Collapse of the matching infrastructure.** The CES matching team —
- 11 which consists of approximately 30 specialized staff within LAHSA’s
- 12 CoC Department — relies entirely on the data systems described herein
- 13 to carry out its work. Without operational HMIS and RMS systems,
- 14 those staff cannot perform their core function.
- 15 44. In sum, the immediate shutdown of LAHSA’s data analysis operations
- 16 would not merely impair the efficiency of the homeless services system in Los
- 17 Angeles. It would bring much of that system to a halt — cutting off access to
- 18 housing and services for the 11,423 people currently housed or sheltered with
- 19 federal funding, including 1,923 children and 823 transition-aged youth; freezing
- 20 housing access for the approximately 25,398 individuals on the CES PSH waitlist;
- 21 interrupting data system support for 400 agencies and 7,770 users and 175,000+
- 22 active participants in HMIS, cutting off the flow of data upon which federal and
- 23 state funding decisions are made; and dismantling an infrastructure that has taken
- 24 years to build and cannot be reconstructed on short notice.

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed on this 26th day of June, 2026, at Los Angeles, California.
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Signed by:

Bevin Kuhn

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Bevin Kuhn

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