

Congress of the United States

Washington, DC 20510

September 5, 2024

The Honorable Adrienne Todman
Acting Secretary
Department of Housing and Urban Development
451 7th Street SW
Washington, D.C. 20410

Dear Acting Secretary Todman,

Thank you for your consistent efforts to tackle homelessness nationwide and partner with networks of homelessness assistance providers to make sure unhoused individuals will be safe, identified, and provided with appropriate care. As Members of San Diego's congressional delegation, we are writing to follow up on our October 2023 letter to former Secretary Fudge urging the Department of Housing and Urban Development (HUD) to work with communities on the frontlines of the homelessness crisis and revisit the CoC formula to ensure that all communities receive funding proportionate to their needs.

The Continuum of Care (CoC) program is the core federal funding stream to aid communities' ability to address homelessness. The CoC formula was last updated in 1977 and is extremely outdated. In late January 2024, we received a response from you stating that, "HUD is currently developing and will seek comment on a proposed CoC Final Rule that will include changes to the [Preliminary Pro Rata Need] formula." Since late January, Members have repeatedly requested information on the timeline of such a proposed rule.

As you may know, since a March 2013 report¹ found that San Diego had the third-highest homeless population in the country, but received the 18th highest level of federal homelessness funding, members of the San Diego delegation have urged HUD to update the CoC formula to ensure an equitable distribution of funding and resources. This funding disparity hurts the San Diego region's homeless assistance providers, who work daily to provide services to those in need of aid. However, a lesser funding allocation limits our service providers' impact in the region. After the delegation's repeated advocacy on the topic, then-HUD Secretary Julian Castro announced that HUD would reopen public comment on the funding formula during a visit to San Diego in 2015. Regrettably, the Obama Administration did not finalize the rule after HUD reopened the comment period to update the formula ([81 FR 48366](#)) from July to September 2016.

We are concerned that we are heading towards a similar inconclusive resolution. In early July 2024, HUD stated in their Unified Agenda that it estimated a proposed rule would be published and open for public comment in December 2024. This worries us since President Biden's term will end in January 2025. Opening a proposed rule for public comment one month before the term ends gives no realistic runway for this rule to be finalized and enacted.

¹ Bennett, Kelly, "SD's Share of Federal Homelessness Funding Doesn't Add Up," *Voice of San Diego*, 14 March 2013. <https://voiceofsandiego.org/2013/03/04/sds-share-of-federal-homelessness-funding-doesnt-add-up/>

We urge HUD to reevaluate the estimated timeline and work quickly to progress the CoC Final Rule through the rulemaking process before the end of President Biden's term. It is crucial, both to San Diego and jurisdictions across the country, that the CoC formula be updated so that funding for homeless support services best represents the demonstrated need across communities.

Thank you for your consideration. We look forward to working together on a path forward.

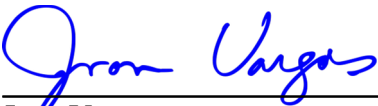
Sincerely,



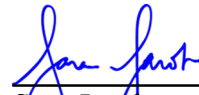
Scott H. Peters
Member of Congress



Mike Levin
Member of Congress



Juan Vargas
Member of Congress



Sara Jacobs
Member of Congress