



April 16, 2020

The Honorable Ben Carson
Secretary
U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410

RE: Allocation Methodology to Emergency Solutions Grant Program, CARES Act Allocation

Dear Secretary Carson,

We write to you in an unprecedented moment. COVID-19 has presented a public health crisis that, in addition to bringing serious health risks to every American and the prospect of a serious recession, threatens to exacerbate our regions' existing homelessness crisis. But we believe we can face this challenge together, by continuing collaboration between our states, cities, counties, and federal partners. We are grateful for the leadership displayed by the U.S. Department of Housing and Urban Development (HUD) over the last several weeks and the critical assistance that is being provided.

As you are aware, no jurisdiction has more people experiencing unsheltered homelessness than Los Angeles County, where of the nearly 59,000 people counted as homeless in the 2019 Point-in-Time (PIT) count, 44,000 were unsheltered. This was a public health crisis prior to COVID, which is why unprecedented efforts are being made to bring new supportive housing, affordable housing, shelter, outreach, rental subsidies, and services to this population using local, state, and federal resources.

But to "bend the curve" now, assist people to shelter in place, and ultimately mitigate the number of lives lost due to this pandemic, we cannot wait for new housing construction and must bring everyone inside immediately. One of the critical resources for doing this is the new allocation of the Emergency Solutions Grant (ESG) program, approved through the CARES Act, which was passed by Congress and signed by President Trump on March 27, 2020.

The federal statute leaves discretion to the Secretary to formulate the allocation methodology for the second tranche of ESG funding, identifying the following recommended criteria:

- Rate of Sheltered Homelessness
- Rate of Unsheltered Homelessness
- Economic and Housing Market Conditions
- Risk of COVID Transmission

We would like to recommend the following formula to ensure that we can maximize the number of people brought into safety during this pandemic:

Rate of Sheltered/Unsheltered

Recommended Percentage	50% of Overall Formula
Recommended Criteria	Within this section of the methodology, we recommend the following criteria: <ul style="list-style-type: none">• Number of unsheltered persons according to 2019 PIT Count: 25%• Percentage of homeless population that is unsheltered according to 2019 PIT Count: 12.5%• Number of sheltered persons according to 2019 PIT Count: 12.5%

Economic and Housing Market Conditions

Recommended Percentage	15% of Overall Formula
Recommended Criteria	Within this section of the methodology, we recommend the following criteria: <ul style="list-style-type: none">• Number of extremely low-income (ELI) households that are severely cost-burdened according to 2018 American Community Survey: 10%• Percentage of households that are severely cost-burdened according to 2018 American Community Survey: 5%

Response Readiness

Recommended Percentage	10% of Overall Formula
Recommended Criteria	Within this newly-identified section of the methodology, we recommend the following criteria: <ul style="list-style-type: none">• Number of shelter beds, motel rooms rented through vouchers or leases, or other interim housing slots where funding can be deployed: 5%• Number of outreach staff employed by or funded by local Continuum of Care: 5%

Risk of Transmission

Recommended Percentage	25% of Overall Formula
Recommended Criteria	Within this section of the methodology, we recommend the following criteria: <ul style="list-style-type: none">• Total number of positive COVID tests as of April 16, 2020: 5%• Per capita rate of positive COVID tests as of April 16, 2020: 5%• Number of unsheltered homeless according to 2019 Point in Time (PIT) Count: 5%• Number of sheltered homeless according to 2019 PIT Count: 5%• Overcrowding—Percentage of households with 1.5 persons or more per room according to 2019 American Community Survey: 5%

We believe the above methodology will ensure that sufficient ESG funding is allocated to jurisdictions that have both the scale of need as well as the readiness to deploy these resources in such a way that

the funding will maximize the public health benefits. Additionally, because of the dire public health crisis, we believe that funding should be allocated commensurate to the scale of need, and thus there should be no maximum allocation caps set on awards.

We are grateful for the partnership of the Secretary and dedicated HUD staff in this challenging time. Together, we can face this challenge and bring safety to as many of our homeless neighbors as possible.

Sincerely,



Kathryn Barger
Chair, Los Angeles County Board of Supervisors



Eric Garcetti
Mayor, City of Los Angeles



Heidi Marston
Interim Executive Director, Los Angeles
Homeless Services Authority



Elise Buik
President & CEO, United Way of
Greater Los Angeles

cc:

Los Angeles County Congressional Delegation