**City & County of San Francisco Homelessness Oversight Commission (HOC)**

| **Commission Members:** | **Daniel Lurie** | **Mike Levine, Executive Director** | **Commission Secretary** |
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| Katie Albright (Chair)<br>Obai Rambo (Vice Chair)<br><br>Dontaye Ball<br>Bevan Dufty<br>Joaquin Guerrero<br>Sharky Laguana<br>Thomas Rocca | Mayor | Department of Homelessness and Supportive Housing | Bridget Badasow |

September 14, 2026

**Sent via Electronic-Mail:** SFGrandJury@sftc.org

The Honorable Rochelle C. East, Presiding Judge
Superior Court of California, County of San Francisco
400 McAllister Street, Room 008
San Francisco, CA 94102-4512

**Re: Homelessness Oversight Commission Response to the 2025–2026 Civil Grand Jury Report, *At Scale, At Risk: Upgrading Data and Oversight to Improve Homelessness Services***
**(June 23, 2026)**

Dear Presiding Judge East:

The Homelessness Oversight Commission ("Commission" or "HOC") submits this response to the 2025–2026 Civil Grand Jury report, *At Scale, At Risk: Upgrading Data and Oversight to Improve Homelessness Services* (June 23, 2026). Pursuant to California Penal Code Section 933 and 933.05, the Commission adopted this response at its publicly noticed meeting on September 3, 2026.

The Commission extends its gratitude to the Civil Grand Jury for its dedicated work. We share the Jury's conviction that shelter and permanent supportive housing ("PSH") residents deserve safety, dignity, and transparent outcomes.

**HOC Response to CGJ Findings:**
**CGJ Finding F1:** "HSH has not used Critical Incident Reports effectively to identify troubling patterns or to improve safety at housing sites."
**HOC Response: The Commission partially disagrees with this finding.** The Commission agrees that Critical Incident Report ("CIR") data was not historically aggregated or analyzed systemwide to its full potential, a limitation noted in the Controller's April 2024 analysis. CIRs should drive systemwide safety analytics, and the Department of Homelessness and Supportive

Housing ("HSH") has since built an internal dashboard to aggregate CIR data and evaluate expanded public transparency tools.

However, the Commission disagrees that HSH failed to act on critical safety information. Since 2023, HSH has strengthened anti-violence contract terms, expanded provider training, and piloted individualized safety planning. Where specific failures have been identified, HSH has acted: in February 2026, HSH issued a corrective action letter directing a provider to overhaul its wellness check process, implement added staff training, and develop a technological improvements plan. While public transparency is expanding, HSH's use of CIR data is improving, not ineffective.

Additionally, key system improvements are underway, including HSH's new Contract Lifecycle Management System (launching over the course of FY26–27, with modules rolling out serially), a $3 million PSH safety investment in the FY26–27 budget, and the interagency PSH Resident and Staff Safety Initiative. Furthermore, HSH's recent decision not to renew four expiring contracts with HomeRise (~$39 million value) following a 2024 City audit demonstrates that existing monitoring mechanisms do carry real consequences.

Finally, the Department welcomed a new Executive Director in July 2026. The Commission looks forward to collaborating constructively with new leadership to assess departmental capacity, evaluate operational constraints, and establish durable, transparent oversight processes.

**CGJ Finding F2:** "HSH is lagging in its efforts to present data that allows for benchmarking nonprofits among themselves by program or housing type, and to use data as a trigger for automated, and targeted program monitoring."

**HOC Response: The Commission partially disagrees with this finding.** The Commission agrees that provider benchmarking and automated data triggers for targeted monitoring are important goals that are not yet in place.

However, the Commission disagrees with characterizing HSH as "lagging" without recognizing the required baseline infrastructure. Effective benchmarking requires reliable, normalized contract and incident data. HSH's data team has expanded significantly, and the Contract Lifecycle Management System, launching over the course of FY26–27 with modules rolling out serially, will provide the necessary foundation to build these portfolio-level tools. The Commission will monitor this progress through Recommendations R2.1 and R4.2.

**CGJ Finding F3:** "HSH's cessation of the established practice of submitting certain contracts to HOC for review and consent and notifying HOC of all renewals and extensions as line items, undermines HOC's impact as a governing oversight body."
**HOC Response: The Commission partially disagrees with this finding.** The Commission agrees that the scope of Commission contract review should be formalized in writing.

However, the Commission disagrees that altering this administrative practice undermines its governing authority. The Commission has consulted with the Office of the City Attorney regarding its authority over contracts. Under the City Charter, contract execution authority rests with the Department Head and Board of Supervisors, not the Commission. HOC's core Charter

responsibilities, specifically, budget oversight, departmental audits, and nominating the Executive Director, are being effectuated. Nevertheless, HOC commits to agendizing on a future meeting the process to establish a formal, written contract review policy in its responses to Recommendations R3.1 and R3.2.

**CGJ Finding F4:** "HOC has yet to exercise the full extent of its statutory authority, and lacks the training and resources to meet the public's expectations as set by the 2022 Prop C initiative."

**HOC Response: The Commission partially disagrees with this finding.** The Commission agrees that it has not ordered an independent performance audit under Charter Section 4.133.

The Commission disagrees with the implication that not relying on the Controller's Office to conduct an audit reflects a failure to exercise authority. Commission-ordered audits across City government are rare; standard practice is to rely on the Controller's professional City Services Auditor, which holds explicit Charter authority, dedicated funding, and professional audit staff. Utilizing established City audit mechanisms rather than duplicating them represents a deliberate, prudent use of public resources.

The Commission further disagrees that its commissioners lack training and resources to meet the public expectations. As to training, the City Attorney provides an extensive onboarding training to every commissioner upon their appointment to the Commission. Moreover, every commissioner is required to take the following trainings on an annual and/or semi-annual basis:

- Annual Ethics Training;
- Bystander Training for Commissioners;
- Citywide Workplace Violence Prevention Training: Commissioners;
- COVID-19 Basic Health and Safety Training;
- Core Interactive and Sunshine;
- Cybersecurity Training;
- Cybersecurity Privacy Training;
- Equitable, Fair and Respectful Workplace;
- Harassment Prevention for Managers, Supervisors and Leads: Commissioner 2026;
- Introduction to Implicit Bias; and
- Transgender 101: Strengthen Your Commitment to Inclusion

As to resources, the Commission has reasonable resources to effectuate its duties, particularly given the priority to provide service and programming in the community.

**HOC Response to CGJ Recommendations:**

**CGJ Recommendation R1.3.** "By June 2027, HSH should include aggregated and anonymized CIR data as part of the Director's report to HOC, quarterly, and through the Sunshine Act, make this available as a data dashboard to the public."

**HOC Response: The recommendation requires further analysis.** Implementation rests principally with the Department. The Commission will work with HSH Executive Director to evaluate departmental capacity, software capability, and cost implications required to incorporate aggregated, anonymized CIR data into regular quarterly reporting (consistent with HIPAA and HMIS privacy constraints). Where feasible within staff capacity and budget, HOC will request an implementation plan from the Department to meet the Jury's timeframe. This analysis will be completed within six months of the Commission's adoption of this response, so that reporting can begin by the Jury's June 2027 date.

**CGJ Recommendation R1.4.** "By December 2027, HSH should designate the most serious coded incident categories in CIRs as standards in a separate section required in all its nonprofit contracts, tentatively titled, 'Safety Standards.' The Safety Standards section should also include thresholds for triggering additional, targeted review."

**HOC Response: The recommendation requires further analysis.** Designing contract terms is an executive function, and establishing incident-based standards across hundreds of provider contracts involve complex operational questions. These include normalizing thresholds across populations of varying acuity, avoiding disincentivizing honest incident reporting, and aligning with Citywide corrective policies. HOC will confer with the HSH Executive Director to evaluate staff capacity, feasibility, and costs associated with drafting and monitoring these contract provisions before determining how to proceed. This conferral will be completed within six months of the Commission's adoption of this response, well in advance of the Jury's December 2027 date.

**CGJ Recommendation R2.1:** "By December 2026, HSH should begin publishing business intelligence-driven data dashboards for HOC and the public that showcase performance aligned to the Performance Measurement Plan to meet HOC's and the public's need for full transparency on the data and metrics that guide HSH's decision-making."

**HOC Response: The recommendation requires further analysis.** Implementation rests with the Department. HOC will collaborate with the HSH Executive Director to evaluate HSH's technical capacity, staffing resources, and funding required to build public-facing business intelligence dashboards. The Commission will request that HSH report on which performance metrics can be published within existing operational constraints. This analysis will be completed, and the Department's reporting plan calendared for the Commission, within six months of the Commission's adoption of this response.

**CGJ Recommendation R3.1:** "By December 2026, HSH should return contract renewals and extensions to HOC's consent calendar."

**HOC Response: The recommendation requires further analysis.** The threshold question is what scope of contract review best serves transparency without imposing administrative burden disproportionate to its oversight value. Reinstating blanket reviews for all routine renewals could create substantial administrative overhead for staff without an oversight benefit. HOC will work with the HSH Executive Director to assess administrative capacity and establish criteria (such as monetary thresholds or corrective action status) to right-size contract reviews. The Commission will

complete this analysis and agendize the scope of its contract review for public discussion within six months of the Commission's adoption of this response.

**CGJ Recommendation R3.2:** "By December 2026, HSH and HOC should work together to establish new threshold requirements for HOC's review of, and comment on, nonprofit contracts appearing on its consent calendar, taking into consideration that the monetary thresholds for BOS approval of contracts."

**HOC Response: The recommendation has not yet been implemented, but will be implemented in the future.** HOC agrees to collaborate with the HSH Executive Director and the Office of the City Attorney to establish clear threshold requirements for contract reviews. The Commission will evaluate departmental staff capacity and adopt a written contract review policy that ensures public transparency for high-value agreements without duplicating Board of Supervisors oversight. The Commission will consider this policy for adoption at a public meeting within six months of the Commission's adoption of this response.

**CGJ Recommendation R4.1.** "By June 2027, the City Attorney should create onboarding and training materials for current commission members and future appointees to explain HOC's authority, including performance audits and how to conduct or commission them, and how to conduct robust contract reviews."

**HOC Response: The recommendation has been implemented.**
As stated above, the Commissioners already receive extensive onboarding training and annual training. Additionally, the Commission may seek advice from the City Attorney as necessary and appropriate.

**CGJ Recommendation R4.2.** "By March 2027, HSH should collaborate with HOC to review and revise the Executive Director's monthly report to HOC to incorporate data and format requests from HOC commissioners, including its Data Officer."

**HOC Response: The recommendation has not yet been implemented, but will be implemented in the future.** HOC will agendize a structured discussion to consolidate commissioner data requests (including input from its Data Officer) and work with the Executive Director to evaluate staff capacity and data collection systems to update the monthly report structure. The Commission's goal is a revised report format in use no later than March 2027, consistent with the Jury's timeframe.

**CGJ Recommendation R4.3.** "By March 2027, HOC should initiate or commission a performance audit per its chartered authority, to investigate overdoses, including reversals, and deaths at PSH sites with the objective to identify structural or systemic causes and to establish departmental performance standards."

**HOC Response: The recommendation requires further analysis.** Investigating overdoses and deaths in permanent supportive housing is of the utmost concern. The HOC will work with the HSH Executive Director, City Attorney, and Controller's Office regarding the scope, capacity, and cost to conduct a performance audit to investigate overdoses, including reversals, and deaths at PSH

sites with the objective to identify structural and systemic causes and develop performance standards. This analysis will be completed, and the matter prepared for public discussion, within six months of the Commission's adoption of this response.

**Conclusion**

The Commission extends its appreciation to the Civil Grand Jury for its dedicated work. The Commission remains committed to working constructively with the Department Director, assessing operational capacity and costs, and establishing transparent, effective oversight processes that serve the public and unhoused residents of San Francisco.

Respectfully,

Katie Albright

Katie Albright, Chair
Homelessness Oversight Commission
City and County of San Francisco

cc: Mayor Daniel Lurie
Lyssette Bareng, Grand Jury Administrative Analyst, Superior Court of California
Ed Cooper, Foreperson, 2025-2026 San Francisco Civil Grand Jury
Mike Levine, Executive Director, Department of Homelessness and Supportive Housing
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