

Norman Suchar
Director
Office of Special Needs Assistance Programs
U.S. Department of Housing and Urban Development
451 7th Street S.W.
Washington, DC 20410

May 23, 2018

Dear Mr. Suchar:

I am requesting that you do not certify the San Diego Point in Time Count results as submitted by San Diego's Regional Task Force on the Homeless (RTFH). On May 17th, after the results were released publicly, I found areas of concern – which I believe require immediate clarification and/or correction.

People living in recreational vehicles on the street were not included in this year's results, despite being counted. The change was made "per HUD's definition" on Page 2 of the attached [report](#), in which RTFH states:

"For the enumeration part of the WeAllCount recreational vehicles (RVs) were counted separately from car, trucks and vans. The reason behind this change was to get a better overall picture of homelessness in the county. It cannot be assumed that every individual in a RV would consider themselves homeless."

Despite this claim from RTFH, I am not aware of any changes in HUD's definition of "unsheltered homeless".

RVs were included in the count in past years, so this represents a significant change in methodology. The change appears to have occurred without much thought or training. In fact, the RTFH stated in the report, "To better understand if the occupants of RVs consider themselves housed or unstably housed, in the upcoming 2019 WeAllCount, the RTFH intends to do an in-depth outreach to those who live in RVs."

Instead of doing the in-depth outreach prior to removing this population from the count, the RTFH deviated from previous methodology and dismissed possibly hundreds of people as homeless. Furthermore, the results did not mention the number of RVs that were counted but not reported, essentially making this population invisible and leaving suspicion as to why they were not included.

I am also concerned that training was not sufficient for the enumerator to determine what qualified as a RV. Were campers on top of pickup trucks counted as RVs and also excluded? The same may have occurred with large vans that some enumerators may have counted as RVs, as well. The exclusion of these vehicles is problematic in general, and made worse by the way the procedure was rolled out in San Diego.

[for Continuum of Care \(CoC\) Program and the Emergency Solutions Grants \(ESG\) Program](#) titled "IMPORTANT CHANGES TO HIC AND PIT REQUIREMENTS BEGINNING IN 2018" does not reference any changes to counting people in vehicles. Therefore, either the RTFH incorrectly included RVs in the past, or they are erroneously omitting them this year. Either way, the lack of transparency increases the already thin credibility of the San Diego CoC Point in Time Count.

With these inconsistencies in mind, I ask that you do not certify the results as submitted. A second look at the numbers and methodology is needed to determine the accuracy of the report.

Thank you for considering my request.

A handwritten signature in black ink, appearing to read "Michael McConnell".

Michael McConnell

Homeless Advocate

Former Vice-Chair, Regional Task Force on the Homeless

Founding Member, Funders Together to End Homelessness San Diego

Past Leadership Team Member, 25 Cities Initiative to End Veteran and Chronic Homelessness