



Model Federal Legislation

Continuum of Care Oversight and Accountability Act of 2026

A proposal to establish independent oversight of federally funded homelessness systems

DO GOOD INTERNATIONAL | KWF INC. | RELIEF ALLIANCE

Prepared for	The United States Congress
Prepared by	Do Good International, KWF Inc., and Relief Alliance
Representative	Dr. Kridikel R. TruthBey Desir
Title	Continuum of Care Director and Policy Analyst, Do Good International
Date	September 22, 2026

Purpose. This draft is designed for referral to the committees of jurisdiction and review by the Office of Legislative Counsel. It establishes an independent oversight committee within each Continuum of Care while preserving the enforcement authority of the Department of Housing and Urban Development, the HUD Office of Inspector General, the Government Accountability Office, and the Department of Justice.

Scope. The proposal responds to recurring concerns involving funding transparency, local project selection and ranking, conflicts of interest, HMIS access and privacy, subrecipient monitoring, landlord and provider payments, performance reporting, youth and family homelessness, participant rights, retaliation, and unequal access to technical assistance and capacity-building resources.

Drafting status. The language below is model legislation and should receive final review by House or Senate Legislative Counsel before introduction.

119th CONGRESS

2d Session

H. R. _____

To establish independent Continuum of Care Oversight Committees, strengthen accountability for Federal homelessness assistance, protect participants and whistleblowers, improve transparency and equitable applicant access, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

_____, 2026

A BILL

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE.

This Act may be cited as the “Continuum of Care Oversight and Accountability Act of 2026”.

SEC. 2. FINDINGS AND PURPOSES.

(a) FINDINGS.—Congress finds the following:

- (1)** Continuums of Care coordinate Federal, State, local, nonprofit, health, housing, and community resources intended to prevent and end homelessness.
- (2)** Federal law and regulation already require collaborative planning, performance monitoring, fair project selection, HMIS governance, recordkeeping, conflict-of-interest protections, and remedial action when a Continuum does not meet applicable requirements.
- (3)** Oversight functions are frequently performed by entities that also participate in funding, ranking, contracting, data administration, or service delivery, creating actual or perceived conflicts of interest.
- (4)** People experiencing homelessness, formerly homeless individuals, youth, families, survivors, frontline workers, and smaller community-based organizations possess essential knowledge but often lack meaningful authority in fiscal and program oversight.
- (5)** Independent review, public reporting, protected concern reporting, and timely corrective action can reduce waste, fraud, abuse, service failures, retaliation, and inequitable access while improving housing outcomes.
- (6)** Oversight must protect personally identifying information, HMIS security, survivor confidentiality, fair process, and the continuity of housing and services.

(b) PURPOSES.—The purposes of this Act are—

- (1)** to establish an independent Continuum of Care Oversight Committee in each geographic area receiving assistance under subtitle C of title IV of the McKinney-Vento Homeless Assistance Act;
- (2)** to strengthen fiscal stewardship, procurement integrity, applicant access, participant rights, HMIS governance, performance accountability, and public confidence;

- (3) to require meaningful representation of people with lived experience and independent subject-matter experts;
- (4) to provide protected pathways for reporting concerns and appealing local process failures; and
- (5) to expand capacity-building and technical assistance for qualified grassroots, small, emerging, youth-serving, family-serving, faith-based, and lived-experience-led organizations.

SEC. 3. CONTINUUM OF CARE OVERSIGHT COMMITTEES.

(a) IN GENERAL.—Subtitle C of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11381 et seq.) is amended by adding at the end the following:

“SEC. 434. CONTINUUM OF CARE OVERSIGHT COMMITTEES.

(a) DEFINITIONS.—In this section:

- (1) COMMITTEE.**—The term ‘Committee’ means a Continuum of Care Oversight Committee established under subsection (b).
- (2) CONTINUUM.**—The term ‘Continuum’ means a Continuum of Care established for a geographic area under this subtitle and the regulations implementing this subtitle.
- (3) COVERED ENTITY.**—The term ‘covered entity’ means a Continuum, collaborative applicant, unified funding agency, HMIS Lead, recipient, subrecipient, contractor, or other entity that receives, administers, ranks, recommends, monitors, or expends covered funds.
- (4) COVERED FUNDS.**—The term ‘covered funds’ means amounts awarded under the Continuum of Care Program, including Youth Homelessness Demonstration Program amounts administered under that program, and any Federal matching, planning, administrative, or pass-through funds represented as supporting the same project or activity. The term includes Emergency Solutions Grants funds only to the extent administered, coordinated, evaluated, or monitored through the Continuum.
- (5) PERSON WITH LIVED EXPERIENCE.**—The term ‘person with lived experience’ means an individual who is experiencing homelessness or who experienced homelessness during the 7-year period preceding appointment, including a youth or young adult, a member of a family with children, or a survivor of domestic violence, dating violence, sexual assault, stalking, or human trafficking.

(b) ESTABLISHMENT.—

- (1) REQUIREMENT.**—As a condition of eligibility for covered funds, each Continuum shall establish and maintain an independent Committee not later than 1 year after the date of enactment of the Continuum of Care Oversight and Accountability Act of 2026.
- (2) SEPARATE STATUS.**—The Committee shall be legally and operationally separate from the Continuum board, collaborative applicant, unified funding agency, HMIS Lead, local project ranking panel, recipient, and subrecipient. The Committee may share administrative services only under a written agreement that protects its independence, records, budget, and staff direction.
- (3) CERTIFICATION.**—The Secretary shall certify each Committee before the Committee exercises authority under this section and shall recertify the Committee at least once every 3 years.

(c) MEMBERSHIP.—

- (1) COMPOSITION.**—A Committee shall consist of 11 voting members selected through an open, public, and conflict-managed process, including—

- (A) 4 persons with lived experience, including, to the greatest extent practicable, at least one youth or young adult between 18 and 24 years of age, one person with experience of homelessness as a member of a family with children, and one person with experience of unsheltered homelessness;
 - (B) 2 representatives of frontline nonprofit or community-based service providers, at least one of whom represents a small, emerging, faith-based, or lived-experience-led organization that is not the collaborative applicant or unified funding agency;
 - (C) 1 independent professional with experience in governmental auditing, forensic accounting, grants management, procurement, or nonprofit financial compliance;
 - (D) 1 representative with experience in civil rights, fair housing, disability rights, legal services, or participant due process;
 - (E) 1 representative with experience in public health, behavioral health, substance-use treatment, or healthcare for people experiencing homelessness; and
 - (F) 2 community representatives with experience in youth services, education, domestic violence services, veterans services, housing development, landlord relations, philanthropy, workforce development, local government, or faith-based service.
- (2) **CROSS-REPRESENTATION.**—Across the membership described in paragraph (1), the Committee shall include demonstrated expertise concerning youth homelessness, family homelessness, disability access, survivor safety, racial equity, and rural or geographically underserved communities, as applicable to the geographic area.
- (3) **NONVOTING LIAISONS.**—The Secretary may designate a nonvoting liaison. The Committee may invite nonvoting liaisons from the HUD Office of Inspector General, a United States Attorney’s Office, the Government Accountability Office, State or local auditors, public housing agencies, health agencies, and other oversight partners. Nothing in this paragraph compels an independent law-enforcement or audit office to participate.
- (4) **TERMS.**—Voting members shall serve staggered 3-year terms and may serve not more than 2 consecutive terms.
- (5) **SUPPORT FOR PARTICIPATION.**—A person with lived experience may receive a reasonable stipend, reimbursement for travel and caregiving costs, technology assistance, and accessibility accommodations. Such support shall not be treated as income for purposes of Federal housing assistance to the maximum extent permitted by law.
- (d) **INDEPENDENCE AND CONFLICTS OF INTEREST.**—
- (1) No employee or governing-board member of the collaborative applicant, unified funding agency, or HMIS Lead may serve as chair or vice chair of the Committee.
 - (2) A member shall disclose any financial, organizational, employment, family, or other material interest in a matter before the Committee and shall recuse from discussion, access to nonpublic materials, and voting on that matter.
 - (3) No covered entity or group of affiliated covered entities may control the appointment of a majority of members.
 - (4) The Committee shall adopt a publicly available code of conduct, conflict-of-interest policy, recusal log, and annual financial-disclosure process consistent with privacy law.
- (e) **DUTIES.**—Each Committee shall independently—
- (1) review the governance, fiscal controls, procurement, subawards, contracts, payment timeliness, monitoring, corrective actions, and performance of covered entities and covered funds;

- (2) review whether local solicitations, technical assistance, threshold review, scoring, ranking, rejection notices, appeals, and conflict-management procedures are written, public, consistently applied, and reasonably accessible to new and grassroots applicants;
- (3) evaluate HMIS governance, onboarding, training access, privacy, security, data quality, participation, and the consistency between reported services, program records, invoices, payments, and outcomes;
- (4) review coordinated-entry access, housing placement and retention, returns to homelessness, landlord and participant payment issues, youth and family outcomes, service gaps, disability access, civil-rights compliance, and participant grievance systems;
- (5) receive and assess confidential concerns from participants, applicants, providers, workers, landlords, and members of the public;
- (6) track audit and monitoring findings, questioned costs, corrective-action plans, repayment demands, sanctions, and the timely resolution of each item;
- (7) recommend improvements, corrective actions, independent audits, recovery of misspent funds, suspension or reassignment of administrative functions, replacement of a collaborative applicant or HMIS Lead, or direct acceptance of applications by the Secretary when authorized by law; and
- (8) publish the reports and dashboards required by subsection (i).

(f) ACCESS TO RECORDS.—

- (1) **CONDITION OF AWARD.**—As a condition of receiving or administering covered funds, a covered entity shall provide the Committee timely access to records reasonably necessary to perform the duties under subsection (e), including governance records, funding notices, applications, score sheets, recusal records, contracts, invoices, payment records, monitoring reports, corrective actions, performance reports, and policies.
- (2) **LIMITATIONS.**—Access under this subsection shall be subject to Federal, State, Tribal, and local privacy, privilege, confidentiality, and survivor-safety requirements. Nothing in this section authorizes public release of personally identifying information, protected health information, confidential law-enforcement information, or information from a victim service provider’s comparable database.
- (3) **HMIS DATA.**—The Committee shall use aggregate or deidentified HMIS data whenever practicable. Access to participant-level information shall be limited to the minimum necessary, authorized by law, covered by a written data-use and security agreement, and approved by the Secretary or the Secretary’s designee.
- (4) **OBSTRUCTION.**—A covered entity that knowingly withholds, destroys, alters, or materially misrepresents a record subject to this subsection may be subject to remedies available under the applicable grant agreement, 2 CFR part 200, this Act, or other law.

(g) REVIEWS AND SITE VISITS.—The Committee may conduct announced or unannounced site visits consistent with participant safety and program operations; interview staff, participants, applicants, contractors, and landlords on a voluntary basis; retain independent auditors or subject-matter experts; and request that HUD, the HUD Office of Inspector General, the Comptroller General, or the Department of Justice conduct an audit, investigation, or enforcement review. The Committee may not exercise subpoena authority unless separately authorized by Congress.

(h) CONCERN REPORTING, FAIR PROCESS, AND NONRETALIATION.—

- (1) PROCESS.**—Each Committee shall operate an accessible, multilingual, disability-accessible, and confidential process for receiving concerns, grievances, supporting records, and requests for review.
 - (2) FAIR PROCESS.**—Before publishing an adverse finding that identifies a person or entity, the Committee shall provide notice of the material facts, a reasonable opportunity to respond, and a written disposition addressing material evidence, except when notice would compromise safety, a protected investigation, or law-enforcement activity.
 - (3) PROHIBITED RETALIATION.**—No covered entity may discharge, demote, threaten, deny services to, reduce funding or ranking status of, restrict HMIS access of, blacklist, harass, or otherwise discriminate against a person or organization because that person or organization lawfully disclosed information, provided testimony or records, sought review, cooperated with the Committee, or opposed a practice reasonably believed to violate a grant requirement or law.
 - (4) REMEDIES.**—The Secretary shall establish an expedited process to investigate alleged retaliation and may order restoration of access or status, reconsideration of an application, corrective action, repayment, suspension, termination, or other available grant remedy. Nothing in this paragraph limits any right or remedy otherwise available under law.
- (i) TRANSPARENCY AND REPORTING.**—
- (1) PUBLIC MEETINGS.**—The Committee shall meet at least quarterly. Agendas, nonprivileged materials, and minutes shall be published promptly. At least 2 meetings each year shall include a structured public-comment period accessible remotely and in person, when practicable.
 - (2) QUARTERLY DASHBOARD.**—The Committee shall publish a privacy-protective dashboard showing awards, obligations, expenditures, payment timeliness, procurement and subaward status, housing and service outputs, placement and retention outcomes, returns to homelessness, youth and family outcomes, monitoring findings, corrective-action status, and the disposition of concerns received.
 - (3) ANNUAL REPORT.**—Not later than 120 days after the end of each fiscal year, the Committee shall submit to the Secretary, the HUD Inspector General, the Comptroller General, and the appropriate congressional committees an annual report describing findings, recommendations, corrective-action status, unresolved risks, barriers faced by participants and applicants, and progress toward improved housing outcomes.
 - (4) PRIVACY.**—Public reporting shall suppress small cells, identifying details, survivor information, and other data where disclosure could reasonably create a privacy, safety, or reidentification risk.
- (j) HUD RESPONSE AND CORRECTIVE ACTION.**—
- (1) RESPONSE.**—Not later than 90 days after receiving a material finding or recommendation, the Secretary shall provide a written response stating whether the Secretary concurs, partially concurs, or does not concur and describing any action taken or planned.
 - (2) CORRECTIVE-ACTION PLAN.**—If the Secretary substantiates a material deficiency, the Secretary shall require a time-limited corrective-action plan with responsible officials, measurable milestones, participant-protection measures, and follow-up monitoring.
 - (3) REMEDIAL ACTION.**—For a serious, repeated, or uncorrected deficiency, the Secretary may exercise any authority otherwise available, including imposing special conditions, withholding administrative or planning funds, requiring independent monitoring, accepting applications from other eligible applicants, replacing a collaborative applicant or Continuum, suspending or terminating an award, recovering funds, or referring the matter to an appropriate oversight or law-enforcement agency.

(k) LIMITATIONS AND RULES OF CONSTRUCTION.—

- (1)** The Committee is an oversight and recommendation body and may not direct an individual participant’s service plan, disclose protected participant information, or delay emergency housing or services.
 - (2)** Nothing in this section diminishes the authority or independence of the HUD Office of Inspector General, the Comptroller General, the Department of Justice, a State or Tribal authority, or any other entity authorized by law.
 - (3)** Nothing in this section requires a victim service provider to enter data into HMIS or disclose information prohibited by the Violence Against Women Act of 1994 or other law.
 - (4)** Nothing in this section authorizes the Committee to make a final criminal, civil, or administrative liability determination.
- (l) FEDERAL SUPPORT.—**The Secretary shall provide Committees with model bylaws, ethics and recusal standards, audit protocols, data-security requirements, training, technical assistance, and grants sufficient to support independent staff, counsel, translation, accessibility, lived-experience stipends, public reporting, and contracted reviews.”
- (b) CLERICAL AMENDMENT.—**The table of contents for subtitle C of title IV of the McKinney-Vento Homeless Assistance Act is amended by adding at the end the following: ‘Sec. 434. Continuum of Care Oversight Committees.’

SEC. 4. EQUITABLE APPLICANT ACCESS AND CAPACITY BUILDING.

- (a) CAPACITY-BUILDING GRANTS.—**The Secretary of Housing and Urban Development shall establish a competitive grant program to provide direct capacity-building assistance to qualified nonprofit organizations seeking to participate in a Continuum of Care or administer Federal homelessness assistance.
- (b) PRIORITY.—**In awarding grants, the Secretary shall prioritize small, emerging, grassroots, faith-based, rural, youth-serving, family-serving, culturally specific, and lived-experience-led organizations that demonstrate community need and a credible plan to meet Federal fiscal, program, data, and participant-protection requirements.
- (c) ELIGIBLE USES.—**Assistance may be used for—
- (1)** HMIS onboarding, licensing, privacy and security preparation, data-quality assistance, and staff training;
 - (2)** financial systems, internal controls, procurement, payroll allocation, cost principles, match documentation, and audit readiness;
 - (3)** grant development, compliance policies, insurance, board governance, legal review, evaluation, and performance measurement;
 - (4)** coordinated-entry participation, participant safeguarding, language access, disability access, and youth-specific program design; and
 - (5)** pre-award technical assistance and reasonable start-up costs necessary to become grant-ready.
- (d) MINIMUM SHARE.—**Not less than 40 percent of amounts made available under this section shall support organizations with annual operating budgets below a threshold established by the Secretary after public notice and comment.
- (e) NO LOCAL VETO.—**A local Continuum, collaborative applicant, unified funding agency, or HMIS Lead may not bar an otherwise eligible organization from applying for assistance under this section. Receipt of capacity-building assistance does not guarantee selection for a project award.

- (f) **TECHNICAL-ASSISTANCE STANDARDS.**—The Secretary shall require each Continuum to publish a calendar, eligibility standards, points of contact, written onboarding steps, expected response times, and appeal or reconsideration procedures for HMIS access, local project applications, and technical assistance.

SEC. 5. MINIMUM ACCOUNTABILITY CONDITIONS FOR CONTINUUM FUNDING.

- (a) **CERTIFICATION.**—Beginning with the first full fiscal year after the effective date of this Act, a collaborative applicant shall certify that the applicable Committee is operational, independent, adequately funded, and current in its required reports.
- (b) **SELECTION CRITERIA.**—In awarding funds under subtitle C of title IV of the McKinney-Vento Homeless Assistance Act, the Secretary shall consider—
- (1) the independence and effectiveness of the Committee;
 - (2) the transparency, fairness, and timeliness of local selection, ranking, appeal, HMIS onboarding, and technical-assistance procedures;
 - (3) the timely resolution of audit, monitoring, payment, data-quality, civil-rights, and participant-safety findings; and
 - (4) the extent to which the Continuum provides meaningful participation and capacity-building access to persons with lived experience and qualified community-based providers.
- (c) **FAILURE TO ESTABLISH A COMMITTEE.**—If a Continuum fails to establish or maintain a compliant Committee, the Secretary shall provide notice and a reasonable cure period not exceeding 120 days. If the failure continues, the Secretary may impose special conditions, withhold planning or administrative amounts, appoint an interim monitor, or use other remedial authority available under law while protecting renewal projects and participants from service disruption.

SEC. 6. NATIONAL REPORTING AND EVALUATION.

- (a) **HUD REPORT.**—Not later than 18 months after enactment, and annually thereafter, the Secretary shall submit to Congress and publish a national report summarizing Committee findings, systemic risks, corrective actions, retaliation allegations, applicant-access barriers, capacity-building awards, and measurable changes in housing and service outcomes.
- (b) **GAO REVIEW.**—Not later than 4 years after enactment, the Comptroller General shall evaluate the implementation and effectiveness of this Act, including administrative burden, cost, independence, privacy protection, fraud detection, participant outcomes, youth and family outcomes, and access for small and emerging providers, and shall recommend any legislative changes.

SEC. 7. RULEMAKING AND IMPLEMENTATION.

- (a) **INTERIM GUIDANCE.**—Not later than 180 days after enactment, the Secretary shall issue interim implementation guidance after consultation with persons with lived experience, youth and family representatives, survivor-service organizations, Tribal representatives, Continuums, recipients, small providers, auditors, privacy experts, and civil-rights organizations.
- (b) **FINAL RULE.**—Not later than 18 months after enactment, the Secretary shall issue a final rule. The rule shall include minimum independence, appointment, conflict, record-access, privacy, security, grievance, reporting, corrective-action, and due-process standards.
- (c) **MODEL DOCUMENTS.**—Not later than 270 days after enactment, the Secretary shall publish model bylaws, member-selection procedures, recusal forms, data-use agreements, concern-intake procedures, audit protocols, corrective-action templates, and dashboard standards.

SEC. 8. AUTHORIZATION OF APPROPRIATIONS.

- (a) IN GENERAL.**—There are authorized to be appropriated \$75,000,000 for each of fiscal years 2027 through 2031 to carry out this Act.
- (b) ALLOCATION.**—Of amounts appropriated under subsection (a)—
- (1)** not less than \$40,000,000 for each fiscal year shall support Committee operations, independent staff, audits, accessibility, stipends, and public reporting;
 - (2)** not less than \$30,000,000 for each fiscal year shall support capacity-building grants and technical assistance under section 4; and
 - (3)** not more than 7 percent may be used by the Department for administration, national reporting, evaluation, training, and technical assistance.

SEC. 9. EFFECTIVE DATE; SEVERABILITY.

- (a) EFFECTIVE DATE.**—Except as otherwise provided, this Act and the amendments made by this Act shall take effect 1 year after the date of enactment.
- (b) SEVERABILITY.**—If any provision of this Act, an amendment made by this Act, or the application of such provision or amendment is held invalid, the remainder of this Act and the application of its provisions to other persons or circumstances shall not be affected.

Section by Section Summary

This summary explains the operational effect of the model bill. It is not part of the statutory text.

Section 1 Short title

Names the proposal the Continuum of Care Oversight and Accountability Act of 2026.

Section 2 Findings and purposes

States the accountability problem and the need for independent oversight, meaningful lived-experience participation, protected reporting, equitable applicant access, and privacy safeguards.

Section 3 Oversight committees

Requires every CoC to establish an independent 11-member oversight committee. Four seats are reserved for people with lived experience. The committee reviews funding, contracts, local competitions, HMIS governance, participant access, performance, and corrective actions; publishes public dashboards and annual reports; protects confidentiality; and refers serious matters to Federal oversight or law-enforcement offices.

Section 4 Capacity building

Creates direct HUD capacity-building grants for qualified small, grassroots, youth-serving, family-serving, faith-based, culturally specific, and lived-experience-led organizations. Eligible uses include HMIS onboarding, fiscal systems, compliance, evaluation, accessibility, and start-up readiness.

Section 5 Funding conditions

Makes oversight readiness, applicant fairness, HMIS access, audit resolution, and community participation relevant to CoC funding decisions. HUD must give a cure period before imposing remedies and must protect participants and renewal projects from service disruption.

Section 6 National reporting

Requires annual HUD reporting and an independent GAO evaluation after four years.

Section 7 Rulemaking

Requires interim guidance within 180 days, model documents within 270 days, and a final rule within 18 months.

Section 8 Appropriations

Authorizes \$75 million annually for five years, with minimum amounts dedicated to local oversight and nonprofit capacity building.

Section 9 Effective date and severability

Provides a one-year implementation period and preserves the remainder of the Act if one provision is invalidated.

Recommended Congressional Action

1. Refer the draft to House and Senate Legislative Counsel for conforming amendments, defined-term review, appropriations scoring, committee-jurisdiction review, and technical corrections.
2. Seek bipartisan co-sponsors from the committees with jurisdiction over HUD, Federal grants management, civil rights, and government oversight.

3. Request a formal technical-assistance review from HUD, the HUD Office of Inspector General, the Government Accountability Office, and survivor-privacy and HMIS experts without ceding congressional policy choices.
4. Hold a legislative hearing with people who have lived experience, youth and family representatives, small providers, CoC leaders, auditors, HMIS experts, and Federal oversight officials.
5. Develop a Congressional Budget Office estimate and consider a pilot phase if the full nationwide implementation schedule requires adjustment.

Drafting Authorities

The proposal was structured around the current Federal framework, including the following authorities:

- [42 U.S.C. 11360a](#)
- [42 U.S.C. 11381 et seq.](#)
- [24 CFR 578.5](#)
- [24 CFR 578.7](#)
- [24 CFR 578.9](#)
- [24 CFR 578.13](#)
- [24 CFR 578.95](#)
- [24 CFR 578.103](#)
- [2 CFR 200.303](#)

Submission Attribution

Prepared for congressional consideration by Do Good International and Kingdom Warriors Foundation.

Dr. Kridikel R. TruthBey Desir

Continuum of Care Director and Policy Analyst, Do Good International

DoGood.world