

From: [Alan Achterberg](#)
To: [COB Response](#)
Subject: Public Comment for September 29, 2026, Item 19: Emergency Shelter Operations and Services Model Contract
Date: Wednesday, September 23, 2026 3:41:23 PM

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To the Honorable Chair and Members of the Orange County Board of Supervisors:

I support approval of an emergency-shelter contract model that incorporates Housing First, trauma-informed care, harm reduction, County Standards of Care, HUD Continuum of Care requirements, confidentiality, data-security safeguards, County audit rights, and protections for survivors.

Item 19 is also the appropriate time to ensure that these requirements are enforceable protections for participants in the final contracts awarded after the solicitation. The model contract requires operators to enter participant-level information and progress notes in HMIS or, for victim service providers, a comparable database. It also requires privacy and security controls, audit trails, and County oversight. Those provisions should be paired with clear participant-facing procedures.

Before executing final contracts, I respectfully request that the Board direct the County Executive Office and Office of Care Coordination to require each awarded operator to provide:

1. A participant records-access and correction procedure. Participants should be offered timely, safe, and accessible access to their own intake records, service plans, case notes or participant-readable summaries, referrals, releases, and available HMIS or comparable-database record information. Participants should have a non retaliatory process to correct factual inaccuracies or add a statement of disagreement or context.
2. A survivor-specific confidentiality and safe-communications protocol. No information concerning a survivor's location, contact information, safety plan, referral destination, appointments, or schedule should be sent through a phone number, email, portal, physical address, or other channel unless the participant has identified that channel as safe.
3. An accessible grievance and non retaliation process. Each operator should provide written acknowledgment and outcome deadlines, confidential escalation to an identified County/OCC contact, and aggregate reporting to the County on complaint categories and corrective action without disclosing participant identities.
4. Verifiable privacy, security, and data-minimization compliance. HMIS and case notes should be limited to factual, service-relevant, minimum-necessary information. Operators should annually certify privacy/security training, role-based access controls, audit-log review, incident-response readiness, and compliance with data-sharing and subcontractor restrictions.
5. County compliance review before renewal or amendment. Before exercising any renewal, contingency increase, or material amendment authority, the County should confirm compliance with the participant-safety, confidentiality, records-access, grievance, and data-

security requirements in the final contract.

These measures would not delay needed shelter operations. They would make the model contract's existing commitments to safe, survivor-informed, participant-centered, and accountable services meaningful in daily practice.

Respectfully submitted,

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