

AUDIT REPORT

Homeward DC Strategic Plan and Emergency Homeless Shelter Management

OIG No. 23-1-01JA

December 31, 2024



DANIEL W. LUCAS
INSPECTOR GENERAL



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DISTRICT OF COLUMBIA | OFFICE OF THE INSPECTOR GENERAL

MEMORANDUM

To: Laura G. Zeilinger, Director
Department of Human Services

Theresa A. Silla, Executive Director
Interagency Council on Homelessness

From: Daniel W. Lucas
Inspector General 

Date: December 31, 2024

Subject: **Homeward DC Strategic Plan and Emergency Homeless Shelter Management | OIG No. 23-1-01JA**

The Office of Inspector General has completed its audit of the Homeward DC Strategic Plan and Emergency Homeless Shelter Management (OIG No. 23-1-01JA), which examined both the District's progress in addressing chronic homelessness and the impact of newly constructed shelters on safety and service delivery. The audit resulted in seven recommendations: three directed to the Interagency Council on Homelessness (ICH) and four to DHS.

We received feedback from the Department of Human Services (DHS) on October 10, 2024. All recommendations are currently classified as "resolved but open," pending evidence of implemented actions. Though we received initial feedback from ICH's Executive Director, the full Council had not provided an official response prior to the publication of this report. Upon receipt, we will amend our report to include ICH's official position.

The OIG will continue to monitor the implementation of these recommendations through an annual reporting process, with findings to be shared with the Council and Mayor. A public version of the report will be made available on the OIG website, with Dr. Slemo Warigon, Assistant Inspector General for Audits, serving as the primary contact for any inquiries. You may contact Dr. Warigon by email at slemo.warigon@dc.gov or by phone at 202-792-5684.



EXECUTIVE SUMMARY

Homeward DC Strategic Plan and Emergency Homeless Shelter Management

Summary

The Interagency Council on Homelessness (ICH) created Homeward DC 2.0 (HDC 2.0) in 2021. HDC 2.0 is the second iteration of the District's strategic plan to make homelessness rare, brief, and nonrecurring.

The Department of Human Services (DHS) administers the Homeless and Homelessness Prevention Services for families and individuals. It is identified in HDC 2.0 as either the leading or a supporting agency responsible for implementing several of HDC 2.0's strategies.

The Office of the Inspector General (OIG) identified this engagement through its risk assessment process.

Objectives

The objectives of this audit were to assess, for fiscal years (FY) 2021 and 2022:

1. the progress made toward the goal of ending chronic homelessness among individuals and families in the District, and
2. whether the newly constructed shelters increased the availability, equity, and safety of homeless services in the District.

Findings

Our audit of HDC 2.0's progress revealed areas of improvement and opportunity. For example, we commend DHS on its design and execution of its centralized intake process at the Virginia Williams Family Resource Center and its role in the design and construction of seven new Short-Term Family Housing (STFH) facilities, which represent a 24% increase in the District's family shelter capacity.

Conversely, we found that DHS's lack of management oversight contributed to its failure

to adhere to District laws and its own policies, procedures, and contract requirements.

In addition, the ICH did not design consistent and reliable methods to track its committees' responsibilities in HDC 2.0's implementation and did not establish a process to monitor activities and compliance requirements. Furthermore, ICH committees did not develop work plans designed to support HDC 2.0 in FY 2022 and were inconsistent in aligning annual implementation priorities with HDC 2.0's goals. Additionally, the ICH did not provide its required annual updates to the Mayor.¹

Recommendations

We made three recommendations to ICH and four recommendations to DHS. In short, we recommend that ICH adhere to all District laws to submit required annual reports and updates to the Mayor. Additionally, DHS could improve its management oversight by establishing procedures to ensure the agency's compliance with established policies, procedures, and grant requirements.

Management Response

In total, we made seven recommendations to the ICH and DHS to help improve internal controls and ensure compliance with District laws and regulations. DHS agreed with one recommendation and partially agreed with three recommendations. ICH has not provided an official response endorsed by the full Council and we will amend this report upon its receipt.

¹ D.C. Code § 4-752.02(b)(3).





Homeward DC Strategic Plan and Emergency Homeless Shelter Management

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INTRODUCTION

Objective

The objectives of the audit were to assess: (1) the progress made toward the goal of ending chronic homelessness among individuals and families in the District; and (2) whether newly constructed shelters increased the availability, equity, and safety of homeless services in the District.

See Appendix 1 for our audit scope and methodology.

Background

The Interagency Council on Homelessness (ICH), the Department of Human Services (DHS), and The Community Partnership (TCP) work to address homelessness and provide social services for District residents. The ICH coordinates efforts across multiple government agencies and non-profit organizations to develop and assess comprehensive strategies to combat homelessness.² DHS delivers direct assistance to needy individuals and families, manages shelters, and provides social services.³ TCP, an independent non-profit organization, acts as a facilitator between governmental bodies and local service providers, advocates for policy changes, and distributes resources to address the diverse needs of the homeless population in the District.⁴ Together, they form a network that aims to enhance outreach, support, and long-term solutions for homelessness in DC.

The Interagency Council on Homelessness

The [Homeless Services Reform Act of 2005](#) (the Act)⁵ established the ICH “for the purpose of facilitating interagency [coordination with regard to] planning, policymaking, program development...and budgeting for the...homeless services [system in the District].”⁶

The ICH, chaired by the City Administrator, is comprised of cabinet-level leaders, representatives of homeless services providers, advocacy groups, philanthropic or private sector entities, and individuals who are homeless or were formerly homeless.⁷ The ICH is composed of an Executive Committee and four Standing Committees: Strategic Planning, Emergency Response and Shelter Operations, Housing Solutions, and Youth. The ICH Executive Committee is co-chaired by an appointed community representative and a

² [D.C. Code § 4-752.01\(a\) – \(b-1\)](#).

³ D.C. Code § 1-1507.02(II).

⁴ THE COMMUNITY PARTNERSHIP, *About*, <https://community-partnership.org/about/> (last visited June 27, 2024) (TCP).

⁵ D.C. Law 16-0035, codified at D.C. Code §§ 4-752.01 – 756.07.

⁶ D.C. Code § 4-752.01(a).

⁷ D.C. Code § 4-752.01(b).

representative of one of the ICH member agencies.⁸ Standing Committees are co-chaired by a community stakeholder with expertise in the issues coming before the Committee and a representative of one of the ICH member agencies.

The ICH mandate includes providing "leadership in the development of strategies and policies that guide the implementation of the District's policies and programs for meeting the needs of individuals and families who are homeless or at risk of homelessness."⁹ Additionally, every five years, the ICH is required to publish a strategic plan for the provision of services that meet the needs of these individuals and families.¹⁰

In 2015, the ICH published [Homeward DC 2015 – 2020](#) (HDC 1.0), a strategic plan containing the vision for ending long-term homelessness in the District. The HDC 1.0 strategies address (1) building a more effective crisis response system; (2) increasing the District's supply of affordable and supportive housing; (3) removing barriers to affordable and supportive housing; (4) increasing economic security of households in the system; and (5) improving homelessness prevention. Some of the outcomes of HDC 1.0 included increased family homelessness prevention services, the closing of DC General Family Shelter, the opening of smaller short-term, service-enriched family housing shelters, and expanded rental subsidies for families.¹¹

In 2021, the ICH created [Homeward DC 2.0](#) (HDC 2.0), the strategic plan for FYs 2021 – 2025. The ICH designed HDC 2.0 to build on the successes and lessons learned throughout the implementation of HDC 1.0. The goals of HDC 2.0 are:

1. Identify and Address Barriers That Impede Development of New Permanent Supportive Housing,
2. Increase Speed and Efficiency of Housing Lease-Up Process,
3. Continue Capital and Program Improvements to Shelter Stock,
4. Reform Front Door of System for Individuals,
5. Continue Family System Reforms,
6. Support Provider Capacity Expansion,
7. Improve Service Quality and Consistency,
8. Improve Employment and Income Growth Opportunities for Clients,
9. Improve Access to Care for Individuals with Complex Health Needs,

⁸ ICH members agencies include DHS, DOES, MPD, DOB and others. For the full list of ICH membership, see: <https://ich.dc.gov/page/interagency-council-homelessness-members%202017%2004%2024>.

⁹ D.C. Code § 4-752.02(a).

¹⁰ D.C. Code § 4-752.02(b)(2).

¹¹ INTERAGENCY COUNCIL ON HOMELESSNESS, HOMEWARD DC 2.0: STRATEGIC PLAN FY2021-FY2025, at 3 (2021), https://ich.dc.gov/sites/default/files/dc/sites/ich/page_content/attachments/Homeward-DC-Report_FY2021-2025%5B1%5D.pdf (last visited May 2, 2024). (ICH HDC 2.0)

10. Coordinate with Upstream Systems to Track and Stem Inflow,
11. Continue Efforts to Improve Data Quality, and
12. Provide Leadership on Creating a Right to Housing in the US.¹²

Since the implementation of HDC 1.0, the District has reduced the number of families experiencing homelessness from roughly 1,500 per night in 2015 to just over 400 per night as of January 2021.¹³ Additionally, in April 2022 "[t]he number of people experiencing homelessness in the District ... is down 47% from 2016."¹⁴

The Department of Human Services

DHS' mission is to empower residents to "reach their full potential by providing meaningful connections to work opportunities, economic assistance, and supportive services."¹⁵ DHS administers the Homeless and Homelessness Prevention Services for families and individuals and is the lead agency for several HDC 2.0 strategies including managing emergency shelter and transitional housing; connecting residents with resources related to work opportunities, economic assistance, and support services; and providing prevention, intervention, and social services to District residents experiencing a housing emergency or homelessness.¹⁶

The Community Partnership for the Prevention of Homelessness

TCP, a non-profit organization established in 1989, coordinates the Continuum of Care (COC), a comprehensive range of services for those who are homeless or at risk of becoming homeless.¹⁷ DHS awarded TCP contracts for approximately \$79.6 million and \$67.5 million to coordinate the District's homeless services for 2020 and 2021, respectively. TCP employs a network of service providers offering prevention services, street outreach efforts, emergency shelters, transitional housing, and permanent supportive housing for individuals and families who experience homelessness or housing instability. TCP also serves as a lead entity, in collaboration with DHS and the ICH, in conducting the District's Point-in-Time Count, which is an annual census of individuals experiencing homelessness. Additionally, TCP administers the Homeless Management Information Systems (HMIS), which is the primary database of client-level data for District homeless services; more than 120 agencies participate in HMIS.¹⁸ Homeward DC 2.0 relies heavily on the data collected through HMIS.

¹² *Id.*, at 38.

¹³ Press Release, Executive Office of the Mayor, Mayor Bowser Releases Homeward DC 2.0 Plan (July 6, 2021), <https://mayor.dc.gov/release/mayor-bowser-releases-homeward-dc-20-plan>

¹⁴ Press Release, Executive Office of the Mayor, Mayor Bowser Announces Homelessness Is Down 47% Since the Implementation of Homeward DC, Hits 17-Year Low (Apr. 21, 2022), <https://mayor.dc.gov/release/mayor-bowser-announces-homelessness-down-47-implementation-homeward-dc-hits-17-year-low>

¹⁵ DC DHS, *About DHS*, <https://dhs.dc.gov/page/about-dhs> (last visited May 5, 2024).

¹⁶ See D.C. Code § 4-771.01(d)(1-9).

¹⁷ See D.C. Code § 4-753.01(a).

¹⁸ The Community Partnership, *HMIS*, <https://community-partnership.org/hmis/> (last visited June 27, 2024).

AUDIT RESULTS

Finding 1: Since 2018, the District Increased Family Shelter Capacity By 24%

DC Law 21-141, the Homeless Shelter Replacement Act of 2016, "authorize[d] the Mayor to use designated funds, appropriated for the purpose of developing replacement shelter facilities for the DC General Family Shelter . . . and to construct [seven] new facilities in Wards 1, 3, 4, 5, 6, 7, and 8, to provide temporary shelter for families experiencing homelessness."¹⁹

Between 2018 and 2021, the District opened seven new short-term family housing (STFH) facilities. Built to replace DC General Family Shelter, these smaller, service-enriched, community-based housing facilities were a critical piece of HDC 1.0.²⁰ Previously, the DC General Family Shelter housed approximately 250 families. The new STFH facilities can house 311 families, an increase of 24% or 61 additional families.

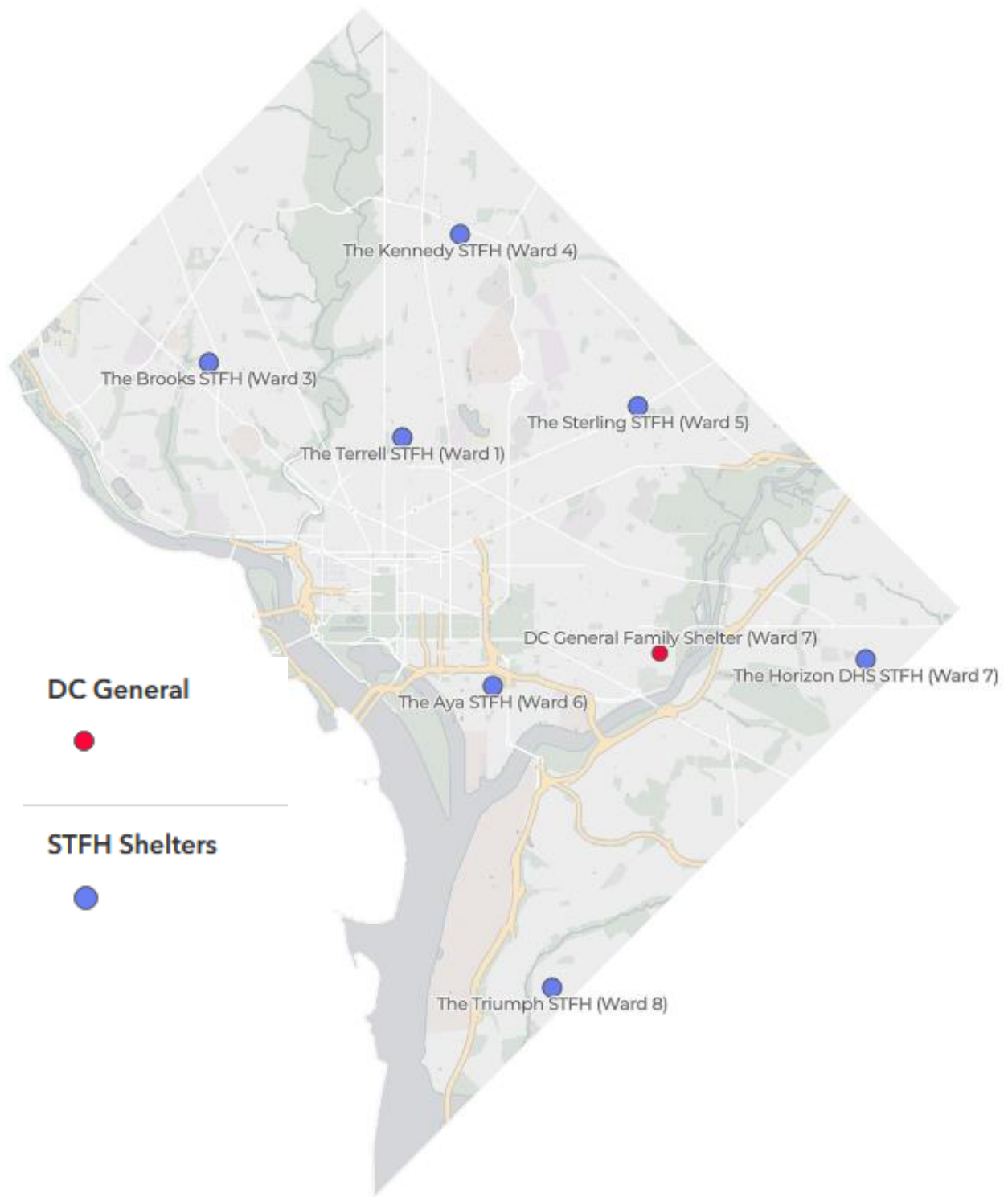
Building and designing new short-term or emergency housing provides stability and creates pathways for families to permanent housing. This strategy is crucial to help families exit homelessness and end chronic homelessness.

In addition to serving more families, the STFH sites are now located in seven of the eight wards as illustrated in Figure 1 on the following page. These locations are intended to provide equitable access to shelter locations in the District and more opportunities for those experiencing homelessness to remain connected to their families and local communities, as compared to the burden of traveling outside of these communities.

¹⁹ D.C. Law 21-141.

²⁰ DC DHS, *Closing DC General Family Shelter Storyboard*, <https://dhs.dc.gov/page/closing-dc-general-family-shelter-storyboard> (last visited May 13, 2024).

Figure 1: Locations of new STFH sites and (closed) DC General Family Shelter as of 2021



Finding 2: DHS' Centralized Intake Process Operated as Intended

The Virginia Williams Family Resource Center (Virginia Williams) is the central intake point for families experiencing or at risk of homelessness in the District during the period covered by this Audit Report. When a family arrives at Virginia Williams, an Eligibility Case Manager meets with the family to complete an eligibility determination assessment. A family could be deemed eligible, ineligible, or interim eligible. According to the Virginia Williams Standard Operating Procedures (SOPs), a family is deemed eligible for services if it met the following criteria:

- they qualify as a "family" under the Homeless Services Reform Act,
- they are homeless or at risk of homelessness,
- they are residents of the District, and
- they meet any additional eligibility requirements established by the provider.

DHS developed comprehensive policies and procedures for a streamlined intake process and for determining the appropriate support and resources for families in need of homeless services. Based on our audit, the intake process operated as intended. We reviewed the records of the families marked as ineligible; we sampled 15 of the 141 ineligible records and determined that DHS correctly assessed all the sampled records. We commend DHS for its streamlined intake process, which provides the appropriate support and resources for families who need homeless services.

Finding 3: The ICH Committees Did Not Develop Work Plans to Support Homeward DC 2.0 in FY 2022

The ICH Executive Committee is responsible for establishing annual implementation priorities.²¹ Further, HDC 2.0 states that committee co-chairs will develop work plans and identify work groups that may be needed to help support the implementation of the work plans.²²

The ICH committees' co-chairs did not develop work plans for implementing the priorities of HDC 2.0. ICH officials did not provide the OIG with an explanation as to why work plans were not developed for FY22 but noted that ICH committees' work plans were often unrealistic and deemed unhelpful. We determined that work plans were not created because ICH committees co-chairs did not adhere to HDC 2.0.

²¹ DISTRICT OF COLUMBIA INTERAGENCY COUNCIL ON HOMELESSNESS BYLAWS, at 3 (Feb. 3, 2021), https://ich.dc.gov/sites/default/files/dc/sites/ich/publication/attachments/ICH%20ByLaws%20_2021.03%20_Aproved.pdf (last visited May 6, 2024). (DC ICH Bylaws)

²² ICH HDC 2.0, *supra* note 11, at 60.

The work plans should create a framework to achieve HDC 2.0's goals, strategies, and objectives and allow District leadership to determine if these goals are realistic, relevant, and achievable. As a result of not developing work plans, there is no reasonable assurance that the goals, strategies, and objectives in HDC 2.0 are measurable and achievable.

Recommendation 1

We recommend that the ICH's Executive Committee, co-chairs of other ICH committees, and the ICH Executive Director:

1. Develop processes that ensure adherence to the strategic plan, including the creation of work plans.

Finding 4 – Annual Implementation Priorities Did Not Always Align With the Homeward DC 2.0 Goals, Strategies, and Objectives

As outlined in the ICH's bylaws, the ICH Executive Committee, co-chaired by DHS, is responsible for establishing annual implementation priorities (priorities).²³

According to the GAO Green Book, "[a]n entity determines its mission, sets a strategic plan, establishes entity objectives, and formulates plans to achieve its objectives."²⁴ Further, the GAO Green Book notes that "[m]anagement defines objectives in specific terms ... clearly defining what is to be achieved, who is to achieve it, how it will be achieved, and the time frames for achievement."²⁵

We observed instances when ICH priorities aligned with HDC 2.0.²⁶ For example, DHS identified the need to analyze turnovers in the Coordinated Assessment and Housing Placement systems as a priority. The Families and Single Adult system work group was designated as the group responsible for ensuring an analysis was conducted. This priority was aligned with strategy 2.2.1 of HDC 2.0.

However, we found that for FY 2022, the ICH did not align all the priorities with the goals, strategies, and objectives of HDC 2.0. We attribute the inconsistent alignment to inadequate monitoring from the ICH Executive Committee. According to ICH officials, the ICH works in partnership with committees and does not consider itself an oversight body. However, the ICH bylaws state the ICH was established for the purpose of facilitating interagency coordination in planning, program development, and approving strategic plans.²⁷ This misalignment reduces the likelihood that the

²³ DC ICH BYLAWS, *supra* note 21, at 3.

²⁴ U.S. GOV'T. ACCOUNTABILITY OFFC., STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOV'T, GAO-14-704G, § OV2.03 (2014), <https://www.gao.gov/products/GAO-14-704G> (last visited May 2, 2024). (GAO Green Book)

²⁵ *Id.* § 6.03.

²⁶ ICH HDC 2.0, *supra* note 11, at 40.

²⁷ ICH BYLAWS, *supra* note 21, at 1.

goals, strategies, and objectives are realistic and achievable and decreases the effectiveness of the ICH's efforts to reduce homelessness.

Recommendation 2

We recommend the ICH Executive Committee:

2. Develop policies and procedures to ensure annual implementation priorities align with the goals, strategies, and objectives of the strategic plan.

Finding 5 – The ICH Did Not Provide Annual Updates to The Mayor

D.C. Code § 4-752.02(b)(3) requires that the ICH "submit to the Mayor an annual update based on existing data and community input that reviews the strategic plan, changes in the landscape, and an assessment of the need for services among subpopulations, and that details the resources and strategies needed to support implementation of the strategic plan[.]"²⁸

We found that in FYs 2021 and 2022, the ICH did not provide the required annual updates to the Mayor. According to ICH officials, the agency did not provide the annual updates due to insufficient staffing, as the ICH was only staffed by the Executive Director at the time.²⁹ As a result, the ICH is out of compliance with D.C. Code § 4-752.02(b)(3).

Without this comprehensive review conveyed in the annual update, the city may miss insights crucial for effectively pivoting its efforts, as needed, to prevent homelessness. The absence of updates could lead to resource misallocation, hindering the District's ability to address specific needs within its homeless community. Furthermore, the absence of a detailed overview of required resources and strategies may impede the District's ability to navigate emerging challenges and achieve the objectives outlined in HDC 2.0.

Recommendation 3

We recommend that the ICH Executive Director:

3. The ICH Executive Director should ensure that annual updates are submitted to the Mayor, as required by law.

²⁸ D.C. Code § 4-752.02(b)(3).

²⁹ PERFORMANCE OVERSIGHT HEARING: BEFORE THE DC COUNCIL COMM. ON HOUSING (Feb. 23, 2023) (ICH Responses to Pre-Hearing Questions) <https://dccouncil.gov/wp-content/uploads/2023/02/Pre-B.6.1.2Hearing-Question-Responses-ICH.pdf> ..

Finding 6 – DHS Did Not Comply with Grant Requirements to Maintain All Records For at Least Three Years

According to the Sole Source Grant Agreement between DHS and TCP, TCP must provide DHS and the District government with access to project and financial records, and must retain all records for at least three years.³⁰ In addition, the Grant Award Renewal letter states that, for auditing purposes, "the Grantor... shall have access at any time ... to examine, audit, excerpt, transcribe, and copy ... any pertinent records and computer files of the Grantee involving transactions relating to the Agreement."³¹

TCP is the grantee and serves as the HMIS administrator. During our audit, we requested the reports used by the District to document the number of families experiencing homelessness during the scope period. According to the HMIS administrator, these reports could not be provided because they were not retained and could not be reconstructed. The HMIS administrator claimed that the reports were not maintained because of the sensitive nature of the information contained, including personally identifiable information.

We attribute this to DHS' failure to ensure that the HMIS administrator abide by the grant agreement requirements to retain and provide the District government with access to project records, such as key performance indicator information generated by the HMIS system. Furthermore, DHS does not have reasonable assurances of the accuracy of HMIS information and reports, which undermines oversight effectiveness.

Recommendation 4
We recommend that the Director of DHS: 4. Ensure that the HMIS administrator preserves all data and information as required.
DHS Response (Partial Agreement): The District's Homeless Management Information System (HMIS) complies with U.S. Department of Housing and Urban Development (HUD) requirements. It tracks client data, services, and housing information for those experiencing or at risk of homelessness. The system has been

³⁰ Sole Source Grant Agreement, Between The Department Of Human Services & The Community Partnership, *DC Homeless Services Continuum Of Care (CoC): Sole Source Grant*, FY 2021 (#JA-FSA-HS-2021).

³¹ Letter from Laura Green Zeilinger, Director DC Department of Human Services to Sue Marshall, Executive Director, The Community Partnership for the Prevention of Homelessness 2 (Dec. 2, 2021) (on file with the OIG).

used by DHS for over 20 years to maintain programmatic and client-level data per federal and local regulations.

The Community Partnership (TCP), as the District's Continuum of Care HMIS administrator under a grant from DHS, is required to retain and provide access to project and financial records for at least three years. TCP meets these requirements and works closely with DHS to ensure compliance.

HMIS is a dynamic system that allows users to update historical data for accuracy, which may lead to changes in reports over time. Data pulled at different moments will reflect these updates, making report replication difficult. TCP informed OIG of this issue and provided updated reports, along with explanations for any discrepancies.

Action Plan: DHS will amend the HMIS grant agreement to require TCP to develop a data reporting Standard Operating Procedure (SOP). This SOP will outline the report parameters and criteria for pulling data from HMIS. DHS will also require TCP to retain copies of all reports used to generate findings for at least three years.

Finding 7 – DHS' Shelter Monitoring Unit Did Not Issue an Annual Report for FY 2021

D.C. Code § 4-754.52 established within DHS a [Homeless] Shelter Monitoring Unit (HSMU) that conducts announced and unannounced homeless shelter inspections.³² The HSMU is also responsible for investigating complaints made by clients of DHS Service providers and following up on unusual incident reports submitted by those same providers.³³ Further, the HSMU is required to issue reports summarizing the findings of each inspection or investigation,³⁴ including an annual report that encompasses a summary of shelter quality and compliance, along with an analysis of identified trends during its monitoring activities.³⁵

We found that DHS did not create an annual report for FY 2021. We attribute this condition to DHS' absence of policies to track and monitor the agency's reporting requirements.

Because DHS did not consistently issue the annual monitoring report on the quality and compliance of the homeless shelters, the District did not have appropriate feedback regarding the quality of shelter services, or any trends identified during DHS' monitoring efforts for one of the two fiscal years we assessed.

³² D.C. Code § 4-754.52(b).

³³ DC DEP'T OF HUMAN SERV. OFFC. OF PROGRAM REVIEW, MONITORING, AND INVESTIGATIONS, HOMELESS SHELTER MONITORING UNIT, STANDARD OPERATING PROCEDURES (HSMU SOP) (undated).

³⁴ D.C. Code § 4-754.53(a).

³⁵ D.C. Code § 4-754.53(c).

Recommendation 5
We recommend that the Director of DHS: 5. Ensure compliance with District law and issue required annual reports.
DHS Response (Agree): DHS acknowledges that the Homeless Shelter Monitoring Unit (HSMU) did not issue an annual report for Calendar Year (CY) 2021 as required under D.C. Official Code §4-754.53(c). Management turnover at DHS, along with pandemic-related disruptions, led to this oversight. While the 2021 report was not issued, HSMU continued to conduct the required inspections, surveys, and virtual monitoring required under D.C. Official Code §4-754.52. DHS program teams also regularly monitored all Short-Term Family Housing (STFH) locations during the pandemic. Action Plan: DHS will submit an <i>ex post facto</i> report documenting shelter monitoring for CY 2021 by October 31, 2024. Reports for CY 2022 and CY 2023 have been submitted, and the CY 2024 report is on track for timely submission.

Finding 8 – DHS Did Not Consistently Conduct Inspections in FY 2021 and FY 2022

District law states that the HSMU “shall monitor the conditions, services, and practices at shelters,³⁶ evaluating the... [h]ealth, safety, and cleanliness of shelters.” Additionally, a homeless shelter provider must receive one announced and one unannounced inspection each calendar year (CY).³⁷

In CY 2021 and 2022, DHS was required to conduct one announced and one unannounced inspection in each short-term housing facility. In CY 2021, DHS did not conduct any of the unannounced, inspections (Table 1). In CY 2022, DHS failed to conduct one unannounced inspection (Table 2).

³⁶ D.C. Code § 4-754.52(a).

³⁷ D.C. Code § 4-754.52(a) and (b).

Table 1: Calendar Year 2021 Unannounced Inspections

Shelter	Required Unannounced Inspections	Unannounced Inspections Conducted
The Terrell	1	0
The Brooks	1	0
The Kennedy	1	0
The Sterling	1	0
The Aya	1	0
The Horizon	1	0
The Triumph	1	0
Total	7	0

Table 2: Calendar Year 2022 Unannounced Inspections

Shelter	Required Unannounced Inspections	Unannounced Inspections Conducted
The Terrell	1	1
The Brooks	1	1
The Kennedy	1	0
The Sterling	1	1
The Aya	1	1
The Horizon	1	1
The Triumph	1	1
Total	7	6

The primary reason that DHS fell short of its legal mandate to perform these inspections was a lack of management oversight. As a result, there are no formal records of some of the shelters' conditions, services, and practices, including the facilities' cleanliness and the safety of the shelters' current and potential residents.

Recommendation 6
We recommend that the Director of DHS: <ul style="list-style-type: none"> 6. Implement processes to ensure that the shelter monitoring unit performs and documents all legally required announced and unannounced inspections.
DHS Response (Partial Agreement): DHS disagrees with the characterization of the 2021 and 2022 inspections as management oversight failures. In response to the

COVID-19 pandemic, DHS, under the Coronavirus Support Temporary Amendment Act of 2021, implemented measures to protect shelter residents and staff, including suspending in-person monitoring visits, and conducting virtual inspections. Most DHS staff were also temporarily shifted to remote work, including HSMU staff. These adjustments meant unannounced inspections were not possible in 2021.

DHS noted the suspension of unannounced inspections in its 2020 Annual report to the ICH (attached). Inspections resumed in person in the spring of 2022, once it was safe to do so.

In addition to the unannounced visits which were suspended in 2021, the audit report identified the following visits were not completed due to management failure and oversight: one announced visit in 2021 to the Horizon; (1) announced and one unannounced inspection in 2021 to the Terrell, and one unannounced inspection to the Kennedy in 2022. DHS agrees it did not conduct one unannounced inspection to the Kennedy in 2022. However, the other inspections were completed as required. Dates for these inspections are listed below and documentation is attached.

- **Announced Inspection (2021):** 12/21/2021 – CORE DC – The Horizon
- **Announced Monitoring Inspection (2022):** 05/12/2022 – CORE DC – The Terrell
- **Unannounced Inspection (2022):** 11/12/2022 – CORE DC – The Terrell

Action Plan: HSMU will ensure all announced and unannounced inspections are scheduled and conducted annually, per its SOP (see attached).

Finding 9 – DHS Did Not Always Submit to DHS Providers Timely Corrective Action Plans

Under the DHS Office of Program Review, Monitoring, and Investigation's (OPRMI) standard operating procedures, the Compliance Monitor observes shelter conditions, services and practice. Following their monitoring activity, the Compliance Monitor must submit a monitoring report within five workdays, "which includes the personnel checklist, corrective action plan, if applicable, exit letter and a complete hard file..."³⁸ We observed that no corrective action plans were submitted within the required timeframe in CYs 2021 and 2022. In CY 2021, five of six corrective action plans were not submitted on time, and one was not submitted at all. In CY 2022, six of seven correction plans were not submitted on time, and one was not submitted at all.

This issue occurred due to a lack of management oversight and supervisory review to ensure adherence to the five-workday requirement. By not submitting corrective action plans in a timely manner, providers cannot promptly improve or correct

³⁸ HSMU SOP, *supra* note 33, Role of Compliance Monitor, § 5.

identified deficiencies that may affect the shelter residents' health, safety, security, and overall well-being.

Recommendation 7
We recommend that the Director of DHS: 7. Ensure that OPRMI submits corrective action plans on time and adheres to its standard operating procedures.
DHS Response (Partial Agreement): DHS disagrees with the finding underlying this recommendation, which is based on a misreading of HSMU's Standard Operating Procedures (SOPs). The HSMU SOPs specify that compliance monitors have five working days to complete a monitoring report for submission to the HSMU's manager following monitoring inspections, and that the providers receive timely action plans. While the SOP specifies a five-day window for internal report submission, this timeline is not always realistic, particularly in the context of modified operations during the pandemic. Particularly during the pandemic, providers and DHS staff faced challenges balancing service delivery with documentation requirements, making it difficult to meet the five-day standard. Action Plan: DHS will update the HSMU SOPs to reflect realistic timelines for completing monitoring reports and submitting corrective action plans to providers. These updates will ensure thorough inspections, timely follow-up by HSMU, and adequate time for providers to address any corrective actions.

CONCLUSION

Through its partnership with the ICH, DHS contributed to the District's progress toward preventing and ending homelessness for District families. It designed and implemented an intake process that appropriately assesses a family's eligibility for emergency assistance and housing. In addition, it successfully increased the number of housing units for families in seven of the eight District wards.

The positive outcomes of DHS' work cannot be overstated. However, deficiencies in implementation prevented DHS and ICH from meeting and achieving some of the requirements and objectives of HDC 2.0. Specifically, ICH did not develop work plans required by HDC 2.0, did not align its priorities with HDC 2.0's goals, strategies, and objectives, and did not provide annual updates to the Mayor. Without structured plans, actionable deliverables, and critical updates to the Mayor, the District jeopardizes achieving its overall goal of making homelessness rare, brief, and nonrecurring.

Further, DHS did not enforce the grant agreement to preserve data published in HDC 2.0 documents and did not consistently issue the annual monitoring report.

These conditions increase the likelihood of inadequate supervision and control by management and hinder the District's identification of systemic problems. Finally, DHS did not consistently conduct required inspections, and did not always submit timely corrective action plans to providers. Inconsistency in conducting required inspections and the failure to submit timely corrective action plans could result in health and safety risks affecting the District's more vulnerable population.

To ensure that progress is made toward the goal of ending homelessness, the ICH and DHS should design and implement effective policies and procedures consistent with our recommendations. Implementation of these recommendations will help ensure that HDC 2.0's goals are consistently assessed, its strategies are successfully executed, and that its objectives are achieved.



APPENDIX 1. OBJECTIVES, SCOPE & METHOD

Objectives

The objectives of the audit were to assess: (1) the progress made toward the goal of ending chronic homelessness among individuals and families in the District; and (2) whether newly constructed shelters increased the availability, equity, and safety of homeless services in the District.

Scope

The scope of this audit focused on the District's progress in implementing HDC 2.0 during FYs 2021 and 2022.

Methodology

The audit was included in the OIG Fiscal Year 2023 Audit and Inspection Plan. We issued our engagement letter on October 28, 2022, and conducted this audit from November 2022 through October 2023, in accordance with [Government Auditing Standards](#). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence which provides a reasonable basis for our findings and conclusions, based on the audit objectives.

To develop the overall objectives and scope of this engagement, we reviewed federal and District laws and regulations relevant to HDC 2.0, applicable DC Municipal Regulations, DHS policies and procedures, the ICH bylaws, and HDC 2.0.

We examined DHS policies and procedures to assess controls over existing programs aimed at reducing homelessness and providing housing and shelter. In addition, we used the GAO Green Book to assess the District's activities to monitor performance measures and indicators.

We gained an understanding of the key partners involved in Homeward DC, and assessed the increase in the availability, equity, and security of homeless services for families in the newly constructed short-term housing facilities. We documented our understanding of the intake process to ensure the accuracy of the screening and eligibility process for accessing preventative and emergency services.

We conducted internal control walkthroughs with DHS officials of the relevant programs at various locations to document our understanding of how the controls were designed and operated. These locations included Virginia Williams Family Resource Center, the 801 Men's East Shelter, and the Sasha Bruce youth shelter. We reviewed the STFH human care agreement contracts to identify required contract services.

We interviewed officials from DHS, ICH, and TCP to understand each entity's role and responsibilities in HDC 2.0.

We reviewed the Mayor's plans to close DC General Family Shelter and to create seven smaller-scale, service-enriched short-term housing facilities for families throughout the District.

We observed the referral, client intake and exit, and data collection procedures at various sites. We assessed the validity and reliability of computer-processed data and performed limited existence and completeness tests to verify the accuracy of the data. We determined that the data we used to write this report was sufficiently reliable and believe that the evidence obtained provides a reasonable basis for our findings and conclusions, based on our audit objectives.



APPENDIX 2. DHS MANAGEMENT RESPONSES



Office of the Director

October 10, 2024

Daniel W. Lucas
Inspector General
717 14th Street, NW
Washington, DC 20005

Dear Inspector General Lucas:

I am writing to provide the District of Columbia (“District” or “DC”) Department of Human Services (DHS)’s response to the DC Office of the Inspector General (OIG) draft audit report entitled, *Homeward DC Strategic Plan and Emergency Shelter Management* (OIG Project No. 2023-I-011A). First, it is important to clarify that *Homeward DC* is not a law, regulation, or binding policy but a strategic plan designed to be adaptive and responsive to the evolving needs of the community and the changing landscape of homeless services in the District. The *Homeless Services Reform Act of 2005* (HSRA), as amended, provides the legal framework governing homeless services, including the rights, responsibilities, and service quality standards. The implementation of *Homeward DC* draws from strategic guidance, but it is not confined by rigid mandates.

As a living document, *Homeward DC* adapts its strategies and actions to current conditions. Major shifts, such as the COVID-19 pandemic, the availability of American Rescue Plan Act (ARPA) funding, and evolving community needs, have required us to modify our approaches accordingly. This continual learning and adjustment process enables us to better serve our community without being restricted by static requirements. It is also crucial to acknowledge the impact of the pandemic on operations during the audit period. DHS, along with the entire homeless services continuum, had to respond rapidly and make significant operational changes to prioritize the health and safety of customers, providers and staff. These changes undoubtedly saved many lives during this critical period.

Our primary goal remains to make homelessness rare, brief, and non-recurring, which requires flexibility in implementing strategies. The *Homeward DC* plan is a guiding tool toward that goal, not a prescriptive law.

Below are DHS’s responses to specific findings and recommendations in the draft report.

FINDING 6: DHS DID NOT COMPLY WITH GRANT REQUIREMENTS TO MAINTAIN ALL RECORDS FOR AT LEAST THREE YEARS

Recommendation 4: The Director of DHS should ensure that the HMIS administrator preserves all data and information as required.

DHS Response (Partial Agreement): The District’s Homeless Management Information System (HMIS) complies with U.S. Department of Housing and Urban Development (HUD) requirements. It tracks client data, services, and housing information for those experiencing or at risk of homelessness. The system has been used by DHS for over 20 years to maintain programmatic and client-level data per federal and local regulations.

The Community Partnership (TCP), as the District’s Continuum of Care HMIS administrator under a grant from DHS, is required to retain and provide access to project and financial records for at least three years. TCP meets these requirements and works closely with DHS to ensure compliance.

HMIS is a dynamic system that allows users to update historical data for accuracy, which may lead to changes in reports over time. Data pulled at different moments will reflect these updates, making report replication difficult. TCP informed OIG of this issue and provided updated reports, along with explanations for any discrepancies.

Action Plan: DHS will amend the HMIS grant agreement to require TCP to develop a data reporting Standard Operating Procedure (SOP). This SOP will outline the report parameters and criteria for pulling data from HMIS. DHS will also require TCP to retain copies of all reports used to generate findings for at least three years.

FINDING 7: DHS’ SHELTER MONITORING UNIT DID NOT ISSUE AN ANNUAL REPORT FOR FY 2021

Recommendation 5: The Director of DHS should ensure compliance with District law and issue required annual reports.

DHS Response (Agree): DHS acknowledges that the Homeless Shelter Monitoring Unit (HSMU) did not issue an annual report for Calendar Year (CY) 2021 as required under D.C. Official Code §4-754.53(c). Management turnover at DHS, along with pandemic-related disruptions, led to this oversight.

While the 2021 report was not issued, HSMU continued to conduct the required inspections, surveys, and virtual monitoring required under D.C. Official Code §4-754.52. DHS program teams also regularly monitored all Short-Term Family Housing (STFH) locations during the pandemic.

Action Plan: DHS will submit an *ex post facto* report documenting shelter monitoring for CY 2021 by October 31, 2024. Reports for CY 2022 and CY 2023 have been submitted, and the CY 2024 report is on track for timely submission.

FINDING 6 – DHS DID NOT CONSISTENTLY CONDUCT INSPECTIONS IN FY2021 AND FY 2022

Recommendation 6: The Director of DHS should implement processes to ensure that the shelter monitoring unit performs and documents all legally required announced and unannounced inspections.

DHS Response (Partial Agreement): DHS disagrees with the characterization of the 2021 and 2022 inspections as management oversight failures. In response to the COVID-19 pandemic, DHS, under the *Coronavirus Support Temporary Amendment Act of 2021*, implemented measures to protect shelter residents and staff, including suspending in-person monitoring visits, and conducting virtual inspections. Most DHS staff were also temporarily shifted to remote work, including HSMU staff. These adjustments meant unannounced inspections were not possible in 2021.

DHS noted the suspension of unannounced inspections in its 2020 Annual report to the ICH (attached). Inspections resumed in person in the spring of 2022, once it was safe to do so.

In addition to the unannounced visits which were suspended in 2021, the audit report identified the following visits were not completed due to management failure and oversight: one announced visit in 2021 to the Horizon; (1) announced and one unannounced inspection in 2021 to the Terrell, and one unannounced inspection to the Kennedy in 2022. DHS agrees it did not conduct one unannounced inspection to the Kennedy in 2022. However, the other inspections were completed as required. Dates for these inspections are listed below and documentation is attached.

- **Announced Inspection (2021):** 12/21/2021 – CORE DC – The Horizon
- **Announced Monitoring Inspection (2022):** 05/12/2022 – CORE DC – The Terrell
- **Unannounced Inspection (2022):** 11/12/2022 – CORE DC – The Terrell

Action Plan: HSMU will ensure all announced and unannounced inspections are scheduled and conducted annually, per its SOP (see attached).

FINDING 9– DHS DID NOT ALWAYS SUBMIT TO DHS PROVIDERS TIMELY CORRECTIVE ACTION PLANS

Recommendation 7: The Director of DHS should ensure that OPRMI submits corrective action plans on time and adheres to its standard operating procedures.

DHS Response (Partial Agreement): DHS disagrees with the finding underlying this recommendation, which is based on a misreading of HSMU’s Standard Operating Procedures (SOPs). The HSMU SOPs specify that compliance monitors have five working days to complete a monitoring report for submission to the HSMU’s manager following monitoring inspections, and that the providers receive timely action plans.

While the SOP specifies a five-day window for internal report submission, this timeline is not always realistic, particularly in the context of modified operations during the pandemic. Particularly during the pandemic, providers and DHS staff faced challenges balancing service delivery with documentation requirements, making it difficult to meet the five-day standard.

Action Plan: DHS will update the HSMU SOPs to reflect realistic timelines for completing monitoring reports and submitting corrective action plans to providers. These updates will ensure thorough

inspections, timely follow-up by HSMU, and adequate time for providers to address any corrective actions.

We appreciate the opportunity to review and provide feedback on the draft report and recommendations. If you have any questions about this response, please reach out to Christa Phillips, DHS Chief Accountability Officer, at (202) 200-7669.

Regards,



Laura Green Zeilinger
Director, Department of Human Services

APPENDIX

Description: The following is a list of documents referenced used to substantiate DHS responses to the Homeward DC Plan and Emergency Homeless Shelter Management (*OIG Project No. 2023-1-01JA*) report.

Attachment #	Document Folder Name	Description	Report Date /Inspection Date
1	2020 HSMU ANNUAL REPORT	Page 2 highlighted paragraph explains necessity to switch to virtual monitoring	2020
2	2022 HSMU ANNUAL REPORT	Page 2 - highlighted paragraph explains return to in-person monitoring	2022
5	CORE DC – The Horizon	2021 Corrective Action Plan 2021 Site Visit Notification Letter 2021 Monitoring Inspection Report	12/21/2021
6	CORE DC – The Terrell	2022 Exit Letter 2021 Monitoring Inspection Report	11/21/2022 05/12/2022
7	HSMU Revised SOP's	SOP's HSMU - current processes	11/2023
8	HSMU SOP'S for 2021	SOP's HSMU followed during the audit period	04/2018 through 11/2023



APPENDIX 3. ICH MANGEMENT RESPONSES

We received draft comments from ICH’s Executive Director on September 25, 2024. In accordance with GAO’s [Government Auditing Standards](#) § 6.58, when we receive comments from the responsible official, we either include a copy of their comments or a summary of those comments. However, since the full ICH has not had the opportunity to officially address our report, we are not including the draft comments. We will amend this report when the ICH provides official feedback.



APPENDIX 4. RECOMMENDATIONS STATUS

Responsible Agency	Recommendation	Status	Action Required
ICH	1. Develop processes that ensure adherence to the strategic plan, including the creation of work plans.	Resolved, Open	Tracking implementation
ICH	2. Develop policies and procedures to ensure annual implementation priorities align with the goals, strategies, and objectives of the strategic plan.	Resolved, Open	Tracking implementation
ICH	3. The ICH Executive Director should ensure that annual updates are submitted to the Mayor, as required by law.	Resolved, Open	Tracking implementation
DHS	4. Ensure that the HMIS administrator preserves all data and information as required.	Resolved, Open	Tracking implementation
DHS	5. Ensure compliance with District law and issue required annual reports.	Resolved, Open	Tracking implementation
DHS	6. Implement processes to ensure that the shelter monitoring unit performs and documents all legally required announced and unannounced inspections.	Resolved, Open	Tracking implementation
DHS	7. Ensure that OPRMI submits corrective action plans on time and adheres to its standard operating procedures.	Resolved, Open	Tracking implementation

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