



Audit of Homeless Response System Strategy and Coordination

June 18, 2025

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Executive Summary

Objective and Scope

- Analysis of the Four-Track Strategy and other strategic planning efforts.
- Validation of strategic results and outcomes for effectiveness.
- Assessment of key partners and City coordination to provide emergency shelter space.
- Evaluation of Housing Forward's procedures to count individuals experiencing homelessness, considering federal requirements and best practices.

The scope of the audit is October 1, 2022, to February 29, 2024.

Recommendations

- Collaborate with the Continuum of Care (CoC) and Housing Forward to align the Four-Track Strategy with the broader CoC strategy.
- Require more source documentation from contractors to validate submitted performance results.
- Work with Housing Forward to improve availability of data for contractor performance validation and expectations for data availability.
- Improve communication of strategic decisions to area partners for Temporary Inclement Weather Shelter transportation.
- Encourage Housing Forward to consider and implement opportunities to improve Point-in-Time Count practices and transparency.

Background

In October 2017, the City of Dallas established the Office of Homeless Solutions (OHS) to provide collaborative solutions that make homelessness brief and nonrecurring. OHS was also designed to centralize homeless services and programs across the City and facilitate successful outcomes and partnerships.

With a \$14.8 million budget for FY 2024-25, OHS partners with several external organizations and community members, including the local CoC, led by Housing Forward to meet its overarching strategic and departmental goals.

Weaver and Tidwell, L.L.P. was retained to perform this audit. See [Appendix A](#) for their report.

Observed Conditions

OHS's Four-Track Strategy and performance validation processes are limited in their ability to define success and measure progress toward its goals. Performance validation of external partners, required to inform progress on the strategy, is inconsistent and evidence of results is often incomplete or unavailable. Furthermore, performance reporting requirements in contracts to provide wrap-around services and increase homeless system capacity are limited to support effectiveness and evaluate coordinated services. Strategic coordination of OHS and area partners for post-inclement weather transportation could also be improved.

Opportunities exist for Housing Forward and the local CoC to improve Point-in-Time Count practices and performance reporting that will increase accuracy of count results and enhance transparency of progress within the homeless response system.

Objectives and Conclusions

Part A – Office of Homeless Solutions

1. Is the Office of Homeless Solutions' Four-Track Strategy aligned with other Continuum of Care strategic planning efforts?

Generally, no. The Office of Homeless Solutions has made significant strides in its strategic planning processes since it was established in 2017, implementing its Four-Track Strategy last revised and adopted in 2022. However, an analysis of the Office of Homeless Solutions' Four-Track Strategy in comparison to the All Neighbors Coalition Continuum of Care Program Annual Strategic Priorities, led by Housing Forward, highlight various areas of focus and objectives that are not clearly coordinated, aligned, or defined as complementary in the City's strategy. (See [Appendix A, Observation A.](#))

2. Are strategic results and outcomes for effectiveness, including housing models, wrap-around services, and decreased recidivism for individuals provided housing assistance by the City and its partners through the Rapid Rehousing Initiative valid?

Indeterminable. Performance validation of external partners, required to inform progress on the strategy, is inconsistent and evidence of results is often incomplete or unavailable. (See [Appendix A, Observation A.](#))

3. Is the City's coordination with key partners to provide temporary emergency inclement weather shelter space working?

Yes. However, opportunities exist to improve communication of strategic decisions between OHS and key partners in managing the transportation of unhoused individuals after inclement weather events. (See [Appendix A, Observation B.](#))

Part B – Housing Forward and the Local Continuum of Care

4. Are Housing Forward and the Local Continuum of Care procedures for counting individuals experiencing homelessness aligned with federal requirements and best practices?

Yes. Out of 23 Housing and Urban Development Point-In-Time count requirements, Housing Forward procedures aligned with 18 requirements and partially aligned with 5 requirements. Opportunities do exist to improve Point-in-Time Count practices and performance reporting that will increase accuracy of count results and enhance transparency of progress within the homeless response system. (See [Appendix A, Part B.](#))

Audit Results

See [Appendix A](#) for Weaver report.

Methodology

Weaver and Tidwell L.L.P. was retained to perform this audit. See [Appendix A](#) for Weaver and Tidwell L.L.P.'s methodology. In addition, all five components of *Standards for Internal Control in Federal Government* were considered.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Major Contributors to the Report

Weaver and Tidwell, L.L.P.
Carron Perry – Engagement Manager

Appendix A: Weaver and Tidwell, L.L.P.'s Report

Weaver and Tidwell L.L.P. report begins on the following page.



Performance Audit of the City of Dallas Homeless Response System Strategy and Coordination

Final Report

Weaver and Tidwell, L.L.P. | 2300 N Field Street Suite 1000 | Dallas TX 75201



February 14, 2025

Mr. Mark S. Swann
Office of the City Auditor
City of Dallas
1500 Marilla Street, Room 2FN
Dallas, TX 75201

Mr. Swann,

This report presents the results of the audit procedures performed for the *Performance Audit of Homeless Response System Strategy and Coordination*. Weaver and Tidwell, LLP was engaged to conduct this performance audit to analyze progress on the Office of Homeless Solutions (OHS) strategic initiatives, assess key partners and City coordination, and identify improvements to ensure an accurate and complete count of individuals experiencing homelessness using comparisons with other Texas cities.

This performance audit covered the following key objectives:

- Analysis of OHS's Four-Track Strategy and other strategic planning efforts
- Validation of strategic results and outcomes for effectiveness, including housing models, wrap-around services, and decreased recidivism for individuals provided housing assistance by the City and its partners through the Rapid Rehousing Initiative
- Assessment of key partners and City coordination to provide emergency shelter space
- Evaluation of Housing Forward's procedures to count individuals experiencing homelessness, considering federal requirements and best practices
- Comparison of Housing Forward's procedures to ensure accurate and complete counts of individuals experiencing homelessness to other urban Texas cities

To accomplish these objectives, we evaluated policies, processes, and procedures, analyzed strategic planning processes and documentation of results and outcomes, performed walkthroughs with internal and external stakeholders, and evaluated internal controls and compliance with local and federal requirements for funding. We also evaluated research and survey results from cities and their Continuum of Care to identify best practices for counting individuals experiencing homelessness and other efforts to ensure transparency and accuracy of the state of homelessness in the community.

The following report summarizes the audit results and recommendations for improvement and management's responses. Thank you for the opportunity to work with the City of Dallas on this important audit engagement.

WEAVER AND TIDWELL, L.L.P.

Dallas, Texas

February 14, 2025



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Acronym Glossary

CoC	Continuum of Care
DART	Dallas Area Rapid Transit
HDX	Homeless Data Exchange
HIC	Housing Inventory Count
HMIS	Homeless Management Information System
HUD	U.S. Department of Housing and Urban Development
ICA	Institute for Community Alliances
OHS	City of Dallas Office of Homeless Solutions
PIT	Point-in-Time Count
PSH	Permanent Supportive Housing
RTR	R.E.A.L. Time Rehousing
TIWS	Temporary Inclement Weather Shelter

Executive Summary of Results

Scope and Objectives

The objective of this audit was to:

- Analyze OHS's Four-Track Strategy and other strategic planning efforts
- Validate strategic results and outcomes for effectiveness, including housing models, wrap-around services, and decreased recidivism
- Assess key partners and City coordination to provide emergency shelter space
- Evaluate Housing Forward's procedures to count individuals experiencing homelessness, considering federal requirements and best practices
- Compare Housing Forward's procedures to ensure accurate and complete counts of individuals experiencing homelessness to other urban Texas cities

Scope Period: October 1, 2022 through February 29, 2024

Background

In October 2017, the City of Dallas established the Office of Homeless Solutions (OHS) to provide collaborative solutions that make homelessness brief and nonrecurring. OHS was also designed to centralize homeless services and programs across the City and facilitate successful outcomes and partnerships.

With a \$14.8 million budget for FY 2024-25, OHS partners with several external organizations and community members, including the local Continuum of Care (CoC) led by Housing Forward, to meet its overarching strategic and departmental goals. These goals are encompassed in OHS's Four-Track Strategy last revised and adopted by the City Council in 2022. OHS is also responsible for the oversight and monitoring of its external partners central to the execution of its strategy.

Housing Forward is responsible for the execution of the CoC's annual Point-in-Time Count to count the number of individuals experiencing homelessness in Dallas and Collin counties.

What We Found

OHS's Four-Track Strategy and performance validation processes are limited in their ability to define success and measure progress toward its goals. Performance validation of external partners, required to inform progress on the strategy, is inconsistent and evidence of results are often incomplete or unavailable. Furthermore, performance reporting requirements in contracts to provide wrap-around services and increase homeless system capacity are limited to support effectiveness and evaluate coordinated services. Strategic coordination of OHS and area partners for post-inclement weather transportation could also be improved.

While Housing Forward aligns its practices with most Housing and Urban Development (HUD) *Point-In-Time (PIT) Count* requirements and guidance, we identified additional considerations for Housing Forward and the CoC to improve its PIT Count practices and enhance transparency of progress within the homeless response system. These considerations and accompanying recommendations are provided within the audit results for Housing Forward's review and are not the responsibility of OHS management.

What We Recommend

OHS management should:

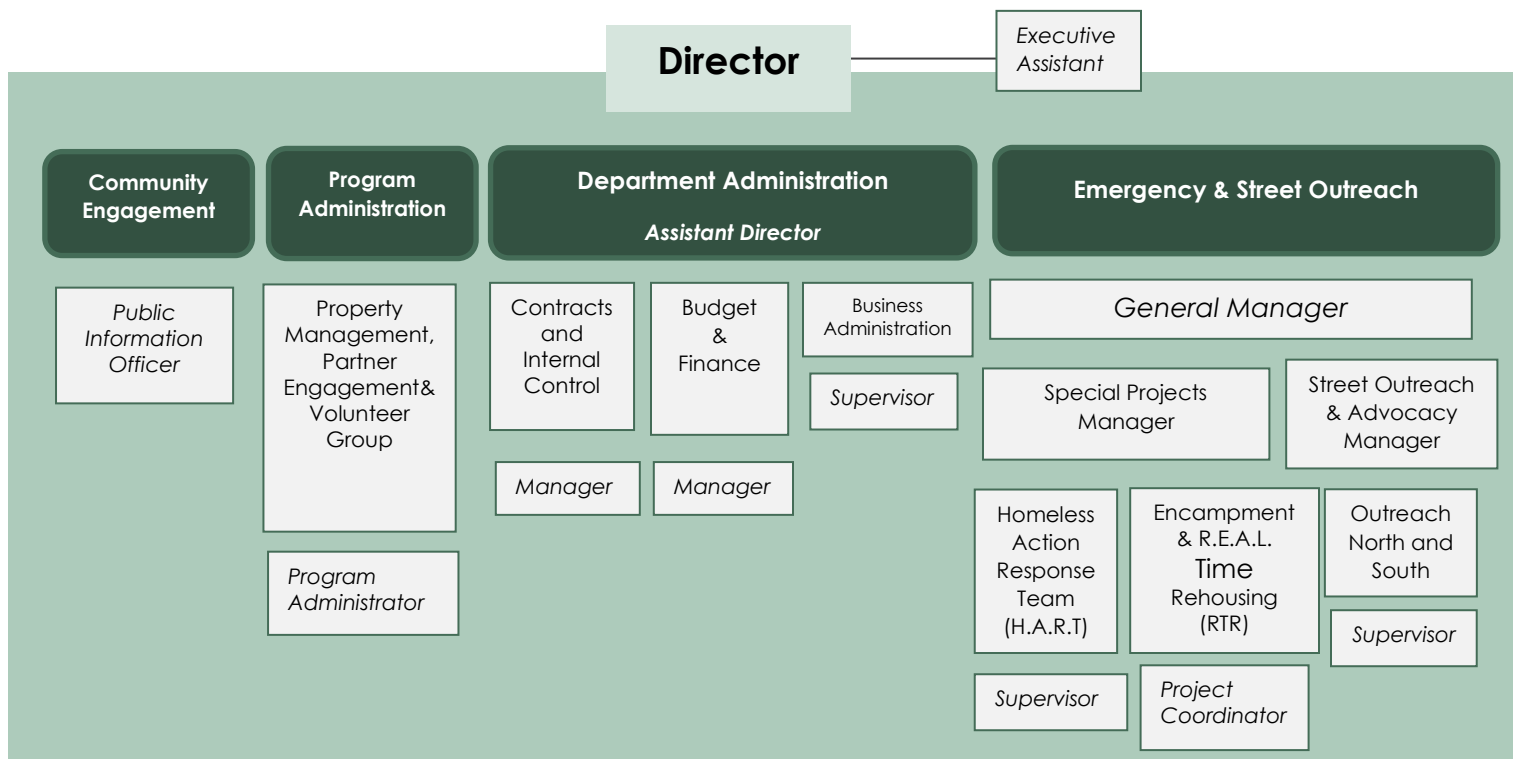
- Collaborate with the CoC and Housing Forward to align the Four-Track Strategy with the broader CoC strategy where feasible and establish quantitative outcomes to better inform progress
- Strengthen alignment of contractor objectives with the Four-Track Strategy, ensure OHS's procedures for performance validation are clear and adhered to, and require more source documentation from contractors to validate submitted performance results
- Work with Housing Forward to improve consistent availability of HMIS data for contractor performance validation and reinforce expectations for data availability in future contracts with Housing Forward
- Improve coordination with area partners for Inclement Weather Shelter transportation by ensuring awareness by all program partners of the decision-making processes for use of bus passes for post-inclement weather transportation

Background, Scope, and Objectives

Background

The City of Dallas Office of Homeless Solutions (OHS) was established by the Dallas City Council in October 2017 to positively impact the quality of life in the City of Dallas through innovative, collaborative, and comprehensive solutions to make homelessness brief and nonrecurring. OHS was also designed to centralize the once fragmented homeless services and programs across the City to become a more effective response system and facilitate successful outcomes and partnerships.

When created, OHS was charged with identifying new and innovative solutions to address the complex issue of homelessness. Consolidating formerly fragmented services such as Street Outreach, Homelessness-focused Grants (Finance Division), Contract Administration, Program Administration (Property Management, Volunteer Services, and Partnerships) into one functioning office has allowed OHS to become a multifaceted department. OHS is organized as follows:



As of FY 2024-25, OHS has an adopted budget of \$14.8 million, down from \$17.8 million the year before (see [Exhibit 1](#)). This is due in part to decreases in one-time encampment-related allocations from FY 2023-24, program-specific budget reductions from the Healthy Community Collaborative and Landlord Subsidized Leasing Programs, and reimbursements from the Sanitation Services Department for Environmental Clean Up.

Exhibit 1

Office of Homeless Solutions Annual Budget			
FY 2021-22	FY 2022-23	FY -24	FY 2024-25
\$11,987,770	\$16,851,704	\$17,850,149	\$14,814,707

Sources: City of Dallas Fiscal Year 2022 – 2025 Adopted / Proposed Budgets

OHS partners with several external organizations and community members to meet its overarching strategic and departmental goals to make homelessness rare, brief, and nonrecurring. The City of Dallas is also a key organization of the All Neighbors Coalition (the Continuum of Care Program or CoC) and has significant partnership with the CoC lead agency, Housing Forward.

Housing Forward, formerly Metro Dallas Homeless Alliance (MDHA), was founded in 2002 and leads a system-wide strategy to solve homelessness in the community. As a part of this strategy, Housing Forward is responsible for the execution of the annual Point-in-Time Count, mandated by the U.S Department of Housing and Urban Development, to count the number of sheltered and unsheltered individuals experiencing homelessness in Dallas and Collin counties on a single night in January.

Objectives

This performance audit covered the following key objectives:

- Analysis of OHS's Four-Track Strategy and other strategic planning efforts
- Validation of strategic results and outcomes for effectiveness, including housing models, wrap-around services, and decreased recidivism for individuals provided housing assistance by the City and its partners through the Rapid Rehousing Initiative
- Assessment of key partners and City coordination to provide emergency shelter space
- Evaluation of Housing Forward's procedures to count individuals experiencing homelessness, considering federal requirements and best practices
- Comparison of Housing Forward's procedures to ensure accurate and complete counts of individuals experiencing homelessness to other urban Texas cities

Scope and Methodology

The scope period for the audit was October 1, 2022, through February 29, 2024, but included evaluation of procedures and documentation outside of this period for historical context and understanding of the **current state**.

Our audit procedures included the following:

- Evaluation of OHS and CoC policies, processes, procedures, and relevant supporting documentation related to validation of strategic results and outcomes, coordination of key partners, and PIT Count methodologies and requirements
- Walkthroughs and interviews with relevant OHS personnel and key nonprofit partners of the CoC, including Housing Forward, The Bridge Steps, Austin Street Center, and OurCalling
- Evaluation of strategic objectives and planning processes, internal controls to ensure effective results and outcomes, and compliance with local and federal requirements
- Research and survey analysis of responses from national and comparable CoCs to benchmark procedures for ensuring accurate and complete counts of individuals experiencing homelessness along with applicable best practices

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Weaver Performance Audit Team

Brandon Tanous, CIA, CFE, CGAP, CRMA – Engagement Partner, Governance, Risk, and Compliance

Holly Hart, CPA, CIA – Senior Manager, Governance, Risk, and Compliance

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Detailed Audit Results

As a result of planned procedures, we identified a total of **13** recommendations, under two overarching observations, to address existing gaps in policies, procedures, or processes, and opportunities to improve governance, performance, effectiveness, or efficiency of processes. These recommendations are provided in **Part A: Observations and Recommendations for the Office of Homeless Solutions** of this report.

Additionally, we identified opportunities to improve Housing Forward's Point-in-Time count practices provided in **Part B: Opportunities for Housing Forward and the CoC to Improve the Annual Point-in-Time Count** of this report.

PART A:
Observations and Recommendations for the
Office of Homeless Solutions

Observation A

OHS Strategy and Performance Validation Processes for External Contractors are Limited in their Ability to Define Success and Measure Progress

City of Dallas Office of Homeless Solutions

OHS Four-Track Strategy

Track I: Increase Shelter Capacity

Expand capacity of existing providers through contracted shelter overflow programs

Track II: Inclement Weather Shelters

Provide respite from inclement weather for the unsheltered population

Track III: Subsidized Supportive Housing Provide various support to further the alleviation of poverty to tenants, as well as incentives and risk mitigation to participating landlords.

Track IV: Investments in Facilities Combating Homelessness

Funding for several low barrier housing types; ensuring that program participants are in compliance with the requirements of their housing applications; and day centers, for seamless wrap-around services.

OHS Our Initiatives Strategy Webpage

The Office of Homeless Solutions (OHS) has made significant strides in its strategic planning processes since it was established in 2017, implementing its Four-Track Strategy last revised and adopted in 2022 (see text box "*OHS Four-Track Strategy*").

However, analysis of the Four-Track Strategy in comparison to the *All Neighbors Coalition Continuum of Care Program (CoC) Annual Strategic Priorities*, led by Housing Forward, highlight various areas of focus and objectives that are not clearly coordinated, aligned, or defined as complementary in the City's strategy. In addition, the Four-Track Strategy does not include quantifiable outcomes that define success within each track. Absent of strategy coordination and quantifiable outcomes, the City is limited in its ability to define and validate success to holistically measure progress on its strategic initiatives as a whole.

Furthermore, progress on the OHS Four-Track Strategy is informed through the performance data and measures reported by contractors executing OHS programs to provide homeless services and support. However, OHS has not implemented a consistent process for monitoring and validating contractor performance. Specifically, we identified inconsistencies in verifying the accuracy, completeness, and validity of contractor reported performance data, further limiting the ability to accurately assess and inform progress on its strategy.

Strategy Coordination



Analysis of the OHS Four-Track Strategy and the CoC's Annual Strategic Priorities (CoC Strategy) highlight the following:

- The CoC Strategy is specifically tailored to distinct unhoused populations (e.g., veterans, youth, families), enabling stakeholders to address the unique needs of each group. In contrast, the OHS Four-Track Strategy takes a more generalized approach, without focusing each strategy track on specified unhoused groups.
- The OHS strategy is divided between short-term solutions (e.g., shelter stays) and long-term solutions (e.g., rapid rehousing, permanent supportive housing (PSH)), with two of its tracks concentrating primarily on shelter services. Meanwhile, the CoC Strategy places a greater emphasis on long-term housing solutions throughout its framework.
- Both strategies emphasize key areas such as homelessness diversion, PSH, rapid rehousing, and encampment decommissioning.

Documentation provided by Housing Forward and OHS does not support that the two strategies were initially assessed or continually reassessed for needed coordination to ensure focus areas are aligned and complementary of each other.

Inherently, the City of Dallas and OHS must incorporate additional responsibilities within their strategy, such as responding to 311 calls and monitoring encampments for public health and safety. However, improved coordination and alignment of strategies may assist OHS in determining balanced performance outcomes within its strategy tracks, allowing a more streamlined approach to advancing strategic progress.



The CoC and OHS have certain complementary initiatives, but lack establishment and coordination of these initiatives for optimum alignment and efficiency.

For example, the CoC focuses efforts to reduce chronic unsheltered homelessness with systemwide diversion programs and expanded exits to housing, reducing shelter stays and increasing shelter space. OHS Strategy Track 1 to increase shelter capacity is complementary to this initiative, but only up to the point that an equilibrium is reached to match annual inflow¹. Over time, OHS and the CoC must coordinate their performance outcomes and measures to ensure the City appropriately adjusts its investments in shelter capacity overflow, balancing increases in capacity with eventual declines in demand as diversion programs are scaled and options for exits to housing grow.

All Neighbors Coalition - Housing Forward

The CoC Strategic Priorities

Effectively End Veteran Homelessness: Achieve Federal Declaration w/ United States Interagency Council on Homelessness (USICH)

Significantly Reduce Chronic Unsheltered Homelessness: Sustain expanded rapid rehousing, sustain housing navigation, implement systemwide diversion, scale encampment decommissioning and coordinated outreach, expand permanent supportive housing w/ integrated behavioral healthcare

Significantly Reduce Family Homelessness: Sustain Expanded Diversion, Expand Rapid Rehousing, Revamp Housing Navigation, Integrate Domestic Violence sector into Coordinated Access System

Significantly Reduce Unaccompanied Youth Homelessness: Build Youth Crisis Response and Rehousing System

COC 2024 Annual Planning & Priority Setting
March 2024



¹ Per the CoC 2024 Annual Planning and Priority Setting summary, system modeling indicates the need to eliminate long-term shelter through diversion and housing options, allowing the homeless response system to shrink to match annual inflow.

Strategy Outcomes and Contract Analysis

While several goals exist in each strategy track, the OHS Four-Track Strategy does not include *quantifiable* outcomes that specifically define success in each track. As such, we were unable to assess strategic results and outcomes in relationship to defined success within each track. Alternatively, progress on the strategy is informed through the performance results of contracts executed with external nonprofit contractors to carry out strategic goals within each track (except for Strategy Track 4, which currently has no executed contracts²).

Therefore, we evaluated 10 contracts in each applicable strategy track over the scope period to assess:

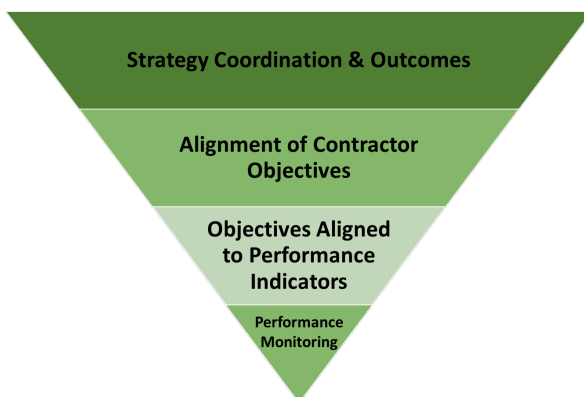
- Contract objective alignment with the Four-Track Strategy
- Alignment of contract objectives with required performance measures and indicators
- Performance monitoring and validation of contractor results and outcomes, including wrap-around services, housing models such as REAL Time Rehousing (RTR) and Permanent Supportive Housing (PSH), decreased recidivism after exit to housing, and coordinated emergency shelter services

Please refer to **Appendix A** for the population of evaluated contracts over the scope period.

Contract Alignment with OHS Strategy

Most required performance measures and indicators specified in contracts align with their respective strategy tracks, providing measurable insight into the *direction* of progress within the OHS strategy. However, we identified the following:

Strategy & Contract Analysis



- Contractor collaboration with OHS on the feasibility of required performance reporting generally occurs *after* the contract has been executed, leading to misalignment of contractor reporting capabilities and the contract's initial requirements.
- While performance measures are defined for exits to housing and recidivism, certain OHS contracts do not require performance metrics to evaluate the *effectiveness* of wrap-around services. Neither the Housing Forward REAL Time Rehousing (RTR) contract or The Bridge Steps Pay-to-Stay contract, requiring specific wrap-around services such as case management, coordinated services, and community integration, include targeted metrics to inform the City of identifiable performance directly related to these services.

U.S Department of Housing and Urban Development (HUD)

Performance Measurement

Outcome: Benefits or changes experienced by program beneficiaries; should be quantitative and qualitative

Indicator: Metrics used to measure achievement of outcomes; measurable and associated with goals

Outputs: Direct products of program activities

HUD's *System Performance Measurement Guide (2015)* provides examples of quantifiable outcomes, such as:

- Reduction in *average length* of time persons remain homeless
- Increase in *percent* of persons who retain housing

Source: HUD Exchange

² As Track 4 does not contain contracts in progress, we could not assess or validate performance for Track 4.

- Inherently, certain contracts only allow for performance reporting at the contract's conclusion (e.g., United Way Metro Capacity Building via stabilization of nonprofits) or upon specific events (e.g., Austin Street Center Inclement Weather Shelter), limiting OHS's ability to consistently capture progress and assess coordinating activities. Efforts to monitor performance for these non-traditional contracts include periodic communication with vendors; however, there are currently no defined processes within OHS standard operating procedures or the contract language to monitor the progress of these contracts outside of specific events or at the conclusion of the contract. For these types of contracts, consideration of *qualitative* methods to track progress on contract objectives may prevent non-performance, failures in ongoing coordinating activities, or needed remediation before final payment and contract closure.

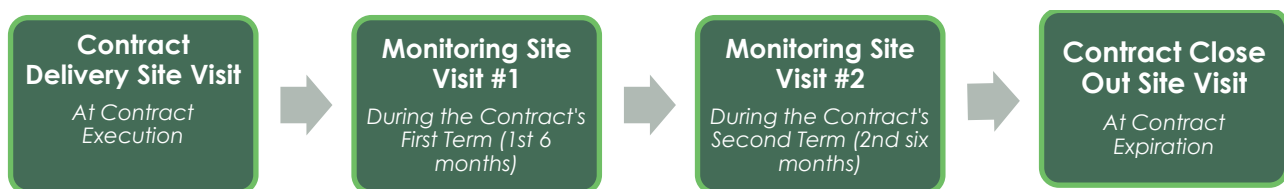
Performance Monitoring and Validation of OHS Contractors

OHS does not have a consistent process to effectively monitor and validate contractor performance. Given progress on the OHS Four-Track Strategy is informed through executed contracts administered by OHS, we evaluated OHS's performance monitoring and validation processes, procedures, and source documentation for 10 contracts relevant to strategy Tracks 1 through 3 to assess the validation of strategic results and outcomes for effectiveness.

Background

OHS monitors the performance of contractors monthly along with verifying expenses for reimbursement. OHS Contract Specialists are responsible for reviewing and verifying the reported performance results, while OHS Finance Specialists are responsible for reviewing and validating contractor expenses for reimbursement.

OHS outlines processes and procedures to evaluate contractor performance and compliance with contract terms in Chapter 5: *Project Administration* of its Standard Operating Procedures (SOP). This includes requirements to review and validate *Monthly Reimbursement Reports* that contain evidence of performance and conduct periodic site visits to confirm the program is following the terms of the contract and operating effectively and efficiently. OHS personnel responsible for contractor performance validation procedures must complete at least four site visits during the contract term, as illustrated below:



Source: The Office of Homeless Solutions' Operations and Performance Division Standard Operating Policies and Procedures: "OHS Project Site Visit Timeline"

We evaluated 36 samples of *Monthly Reimbursement Reports* and documentation from 30 monitoring site visits for ten contracts administered by OHS and identified inconsistencies in ensuring contractor performance data is accurate, complete, and valid according to performance objectives and indicators stipulated in contracts.

Furthermore, the execution of performance monitoring procedures, specifically the expectation to conduct site visits, does not consistently adhere to its procedures in Chapter 5: *Project Administration*. The specific results of the evaluation are provided in [Exhibit 2](#).

Exhibit 2: Monthly Reimbursement Report and Site Visit Evaluation

Issue Identified	Details	Contracts with Exceptions
Performance Data Unavailable	Two of 10 contractors (6/36 samples) did not report monthly performance results due to performance data only available at specific intervals (e.g., end of contract or upon certain events). To monitor the performance of these non-traditional contract, OHS engages in periodic communications with vendors but has not established a formal process for tracking progress on contract objectives. Per OHS management, a formal process is being developed.	United Way Metro. Dallas Capacity Building Program Austin Street Center Temporary Inclement Weather Shelter (TIWS) Program
Contractor Unresponsive	For the <i>Housing Forward Master Leasing Contract</i> and <i>RTR Street Outreach Contract</i> , documentation to substantiate requests for reimbursement and validate performance have not been received (as of the end of audit fieldwork), prompting OHS to withhold payment.	Housing Forward RTR Outreach Housing Forward Master Leasing
Unreconciled Performance Data	We were unable to reconcile the performance data to valid source data and documentation for 6 out of 10 contracts (18/36 samples), as documentation such as Homeless Information Management System (HMIS) reports or other valid support (if HMIS system validation is not feasible ³) was not provided.	Austin Street Center Temporary Inclement Weather Shelter (TIWS) Program CitySquare Landlord Subsidized Leasing Program First Presbyterian Church dba (The Stewpot) Homeless Diversion Program Bridge Steps Homeless Diversion Program Catholic Charities of Dallas Supportive Housing for Seniors Program Housing Forward Master Leasing Program
Unvalidated Internal Documents	Two of 10 contractors (7/36 samples) submitted internally generated documents (e.g., Tableau dashboards, internal tracking spreadsheets) to support performance results. OHS did not perform additional validation to verify the results were sufficiently supported and accurate.	Bridge Steps Pay to Stay Housing Forward RTR Outreach
Variation in Required Metrics & Available HMIS Data	Four of 10 contractors (16/36 samples) reported performance results that do not align with the corresponding HMIS Reports due to variations in the measures required by their contract and data available in the HMIS system. OHS is working with Housing Forward, subsidized by the City of Dallas to operate HMIS ⁴ , to improve the system's reporting capabilities that meet the City's needs for performance reporting.	Housing Forward RTR Outreach CitySquare Landlord Subsidized Leasing Program Bridge Steps Homeless Diversion Catholic Charities of Dallas Supportive Housing for Seniors Program

³ HMIS cannot validate performance data for all contracts, as the system tracks clients experiencing homelessness only. Certain contracts are not intended to serve homeless clients directly, as is the case with the United Way Capacity Building Program.

⁴ The City's contract with Housing Forward to manage and maintain HMIS licenses for area partners and service providers, perform in depth data analysis, manage data quality, and provide ad hoc reports was quoted \$430K for calendar year 2025.

Issue Identified	Details	Contracts with Exceptions
Missing Documentation	Four of 10 contractors (15/36 samples) were missing documentation required as part of the <i>Monthly Reimbursement Report</i> , such as the <i>Monthly Feedback Form</i> and supporting source documentation to validate performance and expenses. OHS rationale for not requiring documentation or accepting alternative documentation before expense verification is not documented.	1. Bridge Steps Pay to Stay 2. Bridge Steps Homeless Diversion 3. First Presbyterian Church dba (The Stewpot) Homeless Diversion Program 4. Catholic Charities of Dallas Supportive Housing for Seniors Program

Monitoring Site Visits



For 8 of 10 contractors (11/30 site visits samples), we could not verify monitoring site visits were conducted at the required frequency over the annual contract term per the OHS procedures in Chapter 5: *Project Administration*. Cited reasons include:

- Limited staffing resources to conduct site visits
- The *Monitoring Site Visit Form* is not applicable for the specific contract
- The contractor is not compliant with providing documentation despite OHS requests

OHS procedures do not require contract specialists to maintain documentation to support their assessment during the site visit and conclusions on effective contractor performance, compliance, or data reliability. In addition, the *Monitoring Site Visit Form* does not explicitly make clear the importance of inconsistencies found within the support in relationship to data reliability. Therefore, we could not verify monitoring site visits occurred in alignment with procedures in Chapter 5: *Project Administration* and were effective at achieving the intended purpose.

SOPs and Training



Chapter 5: *Project Administration* does not include clear guidelines on the required supporting source documentation for validating performance results and measures. This prevents OHS contract personnel from referencing OHS expectations for supporting documentation, specifically to validate performance results as currently defined for expense reimbursement.

In addition, performance management training during the scope period for OHS Contract Specialists was not clearly established. Per OHS management, this is attributed to the demand of daily administration of both departmental responsibilities and management of contractors to execute on OHS's strategy.

OHS has reported new initiatives to create an improved mentoring and training process to educate both contract and finance specialists on their roles and responsibilities.

Total Contract Spend



Housing Forward's contracts with OHS for the *Master Leasing Program* and *RTR Street Outreach* (16 FTEs) have utilized only 2% of contracted funds combined, indicating these programs may not be fully implemented as intended to support their respective strategy track (Track 3: Subsidized Supportive Housing). Cited reasons include Housing Forward's use of alternate funding for these services and delays in payments allowed by the contract due to lack of required performance information.

As almost no funds have been spent on these contracts, OHS cannot effectively report on the programs' contributions to the overall progress of the City's strategy for Track 3.

Please refer to **Appendix A** for the total contract amounts spent of each contract evaluated.

Risk Rating: **High**

We recommend the **Office of Homeless Solutions**:

A.1 Work with the Housing and Homelessness Solutions Committee of the City Council and Housing Forward to coordinate its strategy with the broader CoC strategy, where feasible, and periodically reassess alignment as appropriate. This alignment should consider complementary initiatives and performance outcomes to further ensure a cohesive framework for the City's role in the homeless response system, ensure changes in this dynamic environment are addressed, and achieve a balanced approach.

A.2 In addition to qualitative performance outcomes, establish *quantitative* outcomes for the Four-Track Strategy where feasible to better define success and ensure downstream efforts, such as contracting and establishment of performance measures, not only inform the *direction* of progress but provide clarity on the effectiveness of the City's efforts to make homelessness rare, brief, and nonrecurring.

A.3 Strengthen alignment of contractor objectives with its strategy by:

- Ensuring feasibility of required performance reporting in collaboration with contractors *before* contract execution to identify reporting capability concerns and mitigate the risk that OHS will not receive the necessary performance data to inform progress on strategic goals
- Establishing performance measures that evaluate effectiveness of wrap-around services provided by contractors such as Housing Forward and The Bridge Steps as well as capacity building efforts
- Considering qualitative milestones to track progress on contract objectives that are not fully realized until the end of the contract term

A.4 Update Chapter 5: *Project Administration* of its procedures to include specific guidelines and requirements that validate contractor performance in enough detail to provide contract specialists with examples of appropriate source documentation for validation of performance results and understanding of when additional verification is necessary.

A.5: Ensure consistency and adherence of performance monitoring and validation procedures specified in Chapter 5: *Project Administration* of its procedures. This includes requirements for valid source documentation and protocols for situations in which performance data is inherently difficult to obtain or contractor is unresponsive to requests for required performance information.

A.6: Require source documentation be provided to periodically validate internally generated performance reporting, such as information from dashboards or input into spreadsheets.

A.7 Define the requirement to document exceptions within the *Monthly Reimbursement Report* in instances when procedures to validate performance or expenses diverge from expectations set forth in the contract or OHS procedures. Ensure review and approval of the documented exceptions before payment is issued, and periodically review these instances to determine opportunities to improve contractor compliance.

A.8 Continue to work with Housing Forward to improve consistent availability and utilization of HMIS data for performance validation purposes, including availability of data and ad hoc reporting needed to validate performance measures and results stipulated in OHS contracts. Consider including and/or enforcing expectations for these efforts in future contracts with Housing Forward, such as the City's contract for HMIS services.

A.9 Ensure that OHS allocates sufficient resources to consistently perform the required number of site visits and retain sufficient evidence to support contract specialists' review and conclusions on performance, effectiveness, and data reliability. OHS should also ensure monitoring site visit forms align with unique contracts prior to the start date and facilitate an awareness of the importance of the site visits to confirm continued data reliability.

A.10 Prioritize training to ensure contract specialists understand their roles and responsibilities in a complex environment, including how to appropriately validate reported performance results on a monthly basis and during site visits.

A.11 Work with Housing Forward to determine an appropriate path forward to effectively utilize the City's allocated general funds for the *Master Leasing Program* and *RTR Street Outreach* contracts. This includes scaled planning efforts between the City and Housing Forward to ensure the funds are used and reinforcement of performance reporting requirements to issue payments allowed by the contracts.

Subsequent Events:

Per OHS management, additional efforts have been made as of the report date to address conditions presented in Observation A and provided below. While these efforts have not been verified by auditors, they may be considered when addressing implementation of recommendations provided.

- **Contractor Collaboration on Performance Reporting (pg 12):** Office of Procurement Services' policies restrict communication between City departments and bidding organizations during procurement. Going forward, these restrictions have been addressed with the Office of Procurement and OHS staff are now permitted to speak with vendors as long as the assigned buyer is in attendance.
- **Monitoring Non-Traditional Contracts (pg 13):** Efforts are underway to include an updated reporting process and template within OHS standard operating procedures designed specifically to measure activity or benchmarks for non-traditional type contracts or projects.
- **Performance Monitoring and Validation of OHS Contractors (pg 13):** OHS has now added contract monitoring personnel and provided training on the importance of completing the Monthly Feedback Form, ensuring they understand its value in helping partner organizations communicate any challenges or deviations from expected supporting documentation. Further, Going forward, OHS will enforce and update supporting documentation requirements for reimbursement as documented in Chapter 5: *Project Administration*, limiting any acceptable alternatives. OHS is also continuing to collaborate with Housing Forward staff to better understand HMIS capabilities for capturing specific performance measures and other quantitative and qualitative data to enhance performance monitoring. OHS has hired a Data Coordinator to support HMIS analysis, maximize its capabilities, and improve performance reporting.
- **Monitoring Site Visits (pg 15):** OHS is in the process of updating its site visit monitoring processes and procedures, site visit forms, and the defined site visit frequency. OHS is also updating Chapter 5: *Project Administration* to address unique contracts where the typical site-visit frequency is not applicable.

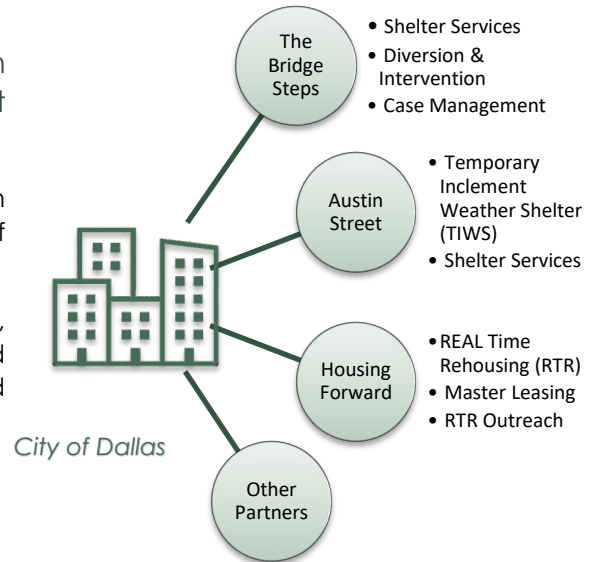
Observation B

Opportunities Exist to Improve Coordination between OHS and Key Partners Regarding Temporary Inclement Weather Shelter Transportation

Opportunities exist to improve coordination and communication between OHS and key partners in managing the transportation of unhoused individuals after inclement weather events.

In addition to documentation and information obtained from OHS, we met with the following key partners to confirm selected coordinating activities, review supporting documentation, and obtain feedback:

- Austin Street Center
- Housing Forward
- The Bridge Steps
- OurCalling



Post-Inclement Weather Shelter Transportation Practices

In an inclement weather event, the City's Temporary Inclement Weather Shelter Program (TIWS) is activated and operated by Austin Street Center and area partners such as OurCalling⁵. Transportation to and from TIWS locations is facilitated through a combination of the *Dallas Connector*⁶, City vehicles, and Dallas Area Rapid Transportation (DART) bus passes provided through OHS. After the inclement weather event has ended, these combined resources are used to return individuals to their desired destination via 'transportation zones' identified and periodically updated by OHS' Street Outreach team to align with *accessible support services* and areas of high traffic from individuals experiencing homelessness (please refer to [Exhibit 3](#) below).

Exhibit 3: TIWS Transportation Zones

Zone No.	Zone Location	Facilities / Destinations
1	South of I-30 (Based at OurCalling)	Austin Street Center & City Square Area – encampments & covered bus stops Our Calling Warren United Methodist Church Fair Park Entrances / MLK Jr Blvd & Malcom X Blvd area Dallas LIFE surrounding neighborhood & Kay Bailey Convention Center area Malcolm X Blvd & Pennsylvania Ave Bus Stop Botham Jean Blvd & Al Lipscomb Way MLK J.B Jackson Transit Station - Pick up Only DART NW Fairgrounds (Perry Ave) - Pick up Only

⁵ OurCalling is a faith based zero-barrier daytime outreach center providing daytime shelter services and connecting individuals with on-site and partner services. OurCalling does not have an active contract with OHS, however, they support partners who do contract with OHS. For example, OurCalling will coordinate with Austin Street Center during TIWS activation with supporting services including logistics, security, meal service, etc.

⁶ The *Dallas Connector* is coordinated by Austin Street Center in collaboration with area partners, provides regularly scheduled transportation to persons experiencing homelessness free of charge.

Zone No.	Zone Location	Facilities / Destinations
2	Central Business District (Based at West End Transit Station)	J. Erik Jonsson Central Library The Bridge Steps area The Stewpot/ First Presbyterian Church Dallas 24 Hour Club and surrounding area (Including Gaston Ave, Ross Ave, Park at south end of Greenville Ave Greenville Ave & Ross Ave intersection / Garrett Park at South end of Greenville Ave John J. Carpenter Park – Located across from Pearl Street Transit Station at Pearl and Pacific
3	Medical District & Forest Ln Area (Based at Oak Lawn United Methodist Church)	Parkland Hospital / Southwest Medical Center area / Union Gospel Mission Salvation Army and Medical District areas, Northwest along Harry Hines City Place area, Highway 75 bridge underpasses Medical City Green Oaks Hospital Highway 75 and Forest Ln area Forest Ln DART Station - Pick up Only Parkland Hospital /SWMC DART Stations - Pick up Only Renner Frankford Dallas Public Library - Pick up Only

Source: Office of Homeless Solutions Inclement Weather Activation Webpage

In late 2023, DART officially launched initiatives⁷ in collaboration with area partners to help riders who are experiencing homelessness also connect with support services and minimize the use of DART as a de facto shelter for the unhoused population. However, an added benefit of using the *Dallas Connector* and City vehicles as modes for post-inclement weather transportation is their alignment with area partners' broader initiatives, as these modes both minimize DART as a shelter and more directly connect riders with accessible services located within the identified transportation zones.

However, while the use of DART bus passes for post-inclement weather transportation is appropriate in many instances and a documented plan exists to notify DART officers of the use of bus passes, we were unable to identify a defined strategic decision-making process within the TIWS program, or awareness of such by area partners, to determine a balanced approach for using DART bus passes versus other resources for post-inclement weather transportation. A misaligned approach of utilizing DART bus passes for post-inclement weather event transportation may inherently overwhelm current initiatives and *potentially decrease efficiency and timeliness of individuals being connected with needed services.*

Risk Rating: **Low**

We recommend the **Office of Homeless Solutions**:

B.1 Work with Austin Street Center, OurCalling, and other area partners involved in the TIWS Program to formally define in its transportation plan when and how the use of DART bus passes is appropriate for post-inclement weather transportation and ensure all partners are aware of its application. This includes considerations for connecting individuals experiencing homelessness with accessible services.

⁷ The *DART Cares Program* is a specialized team of area partners to assist unsheltered riders timely connect appropriate services based on the identified need. Community collaborators include DART; Parkland Health; Dallas Fire Rescue; Metrocare; The Bridge; OurCalling; Downtown Dallas Inc.; Parkland Homes; Integrated Psychotherapeutic Services; SSI/SSDI, Outreach, Access, and Recovery (S.O.A.R.) and the Meadows Mental Health Policy Institute.

Additional Recommendations for OHS

In addition to the recommendations provided as a result of Observation A and Observation B, we offer the following recommendation regarding the opportunities for improvement provided in Part B of this report regarding the annual Point-In-Time count performed by Housing Forward.

R.1 We recommend OHS management encourage Housing Forward to consider and implement the opportunities for improvement provided in **Part B: Opportunities for Housing Forward and the CoC to Improve the Annual Point-in-Time Count**.

PART B:
**Opportunities for Housing Forward and the CoC to Improve the
Annual Point-in-Time Count**

Opportunity 01: Current PIT Count Practices Could Be Improved to Fully Aligned with HUD Requirements, Guidance, and Best Practices

The *Point-in-Time (PIT) Count* practices of Housing Forward do not fully align with U.S. Department of Housing and Urban Development (HUD) required and best practice guidance for the PIT count. We evaluated Housing Forward's PIT count practices for accuracy, completeness, and transparency by comparing them to the requirements and recommended guidelines established by HUD. Requirements and guidelines evaluated include:

- HUD's PIT Count Methodology Guide
- 2024 HUD HIC/PIT Count Data Collection Notice, creating additional requirements for PIT counts
- HUD's PIT Count Planning Worksheet, supplemental guidance to assist communities in planning for and conducting their PIT count, providing a list of all major steps in planning the count
- HUD's Model Night of the Count PIT Survey forms, provided as a tool to assist CoC's in developing their PIT count surveys

Please refer to **Appendix B and C** for additional information regarding analysis of the required and suggested HUD guidance evaluated.

PIT Count Survey Required Questions

Questions pertaining to veteran status of both unsheltered and sheltered counts in Housing Forward's 2024 PIT count survey tool within the *Counting Us* application were not required for volunteers to ask before submitting the survey. The survey format inquired about *veteran status* under a header stating respondents "are not required to answer any question they're uncomfortable with, but responses will help enhance community services." *Veteran status* was the ninth optional question for volunteers to ask under this header, after querying the respondent of their potential substance abuse, chronic health conditions and disabilities, and whether they are homeless due to specified violence, stalking, or assault.

While HUD model survey tools indicate homeless respondent participation is voluntary, and it is understandable that some respondents would decline to answer certain survey questions, HUD does require CoCs to *collect and report* data on veteran survey respondents. This includes the total number of veteran households, the total number of veterans, the total number of persons in veteran households, and the gender, race, and ethnicity of veterans⁸.

Point-in-Time (PIT) Count

The *Point-in-Time (PIT) Count* is a count of sheltered and unsheltered people experiencing homelessness on a single night in January. HUD requires that CoCs conduct an annual count of people experiencing homelessness who are sheltered in emergency shelter, transitional housing, and Safe Havens on a single night. CoCs also must conduct a count of unsheltered people experiencing homelessness at least every other year (odd numbered years). Each count is planned, coordinated, and carried out locally. Data for the PIT count are submitted to HUD via the online data submission Homelessness Data Exchange (HDX).

Volunteers participating in Housing Forward's annual PIT count collect data for the unsheltered and sheltered population via a survey tool within the SimTech Solutions' 'Counting Us' mobile application. Housing Forward manages count preparation and execution via the SimTech Regional Command Center, a dashboard that also consolidates data collected by the application.

Source: HUD Exchange, Housing Forward

⁸ Per HUD's November 2023 *Notice for Housing Inventory Count (HIC) and Point-in-Time (PIT) Count Data Collection Notice*, CoCs **must** collect and report data on veterans, including the total number of veteran households, the total number of veterans, the total number of persons in veteran households, and the gender, race, and ethnicity of veterans.

Per Housing Forward, volunteers are not required to ask questions regarding veteran status prior to survey submission. Housing Forward reported 83% of respondents to the unsheltered survey had a yes or no record of the question pertaining to *veteran status* and provided a summary table in an exported spreadsheet without data to support this metric, such as raw data from the survey tool with this specific data field. Therefore, we could not validate or verify this metric with sufficient supporting source documentation.

While the PIT count is inherently limited in its ability to determine complete and accurate numbers of unhoused individuals⁹, requiring volunteers to ask questions regarding veteran status from respondents who agree to participate can help improve count accuracy of veterans experiencing homelessness. This requirement can also record when a participating respondent *prefers not to answer* questions regarding their veteran status, increasing transparency of PIT count results reported to the community. Furthermore, reporting the unhoused veteran population in Dallas and Collin Counties as accurately as possible will help ensure sufficient funding availability for resources and services for unhoused veterans in the future. Housing Forward has indicated they will work with the survey vendor to require all questions where respondents can prefer not to answer or respond that they do not know the answer.



Survey responses from three of four comparable peer CoCs reported that veteran status is a required question in their respective PIT count surveys to help ensure data for this HUD-required demographic is asked for and collected by volunteers. See **Appendix E** for detailed survey results.

Housing Forward PIT Count Planning

Housing Forward's current *PIT Count Plan* and accompanying documents do not fully align with HUD's *PIT Count Methodology Guide* and supplemental requirements and guidelines (see **Exhibit 4**). These requirements and guidelines include standards and best practices designed by HUD to improve the quality of homelessness data. Specifically, HUD requires all CoCs have a *PIT Count Plan* with the planning attributes detailed in **Appendix B**, such as roles and responsibilities, intent and scope of the count, methodologies, data quality plans, survey development, training, and reporting requirements.

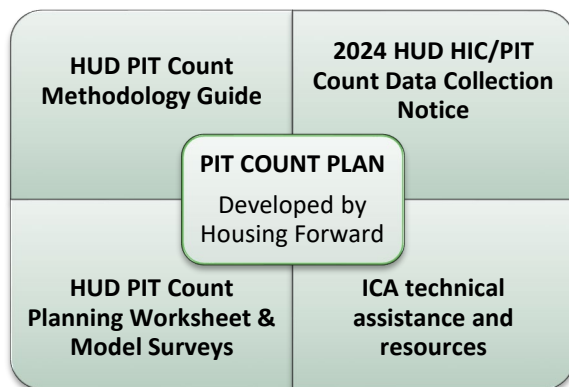


Exhibit 4: PIT Count Plan Development

Housing Forward develops their *PIT Count Plan* for the CoC with the assistance of the *Institute of Community Alliances*¹⁰ (ICA), an external vendor providing technical assistance and support for the PIT count and subsequent reporting of results. Currently, Housing Forward's *PIT Count Plan* is established through various documents and systems, including internal planning spreadsheets that function as a task tracker and timeline of PIT count activities. We analyzed these spreadsheets and supplementary documentation, as available, to determine if Housing Forward reasonably satisfied the required PIT count planning activities and attributes outlined by HUD.

⁹ The Government Accountability Office (GAO) January 2020 Report "*Better HUD Oversight of Data Collection Could Improve Estimates of Homeless Population*" determined that PIT count data was likely underestimated because identifying people experiencing homelessness is inherently difficult, recommending HUD strengthen its guidance and oversight to improve the quality of homelessness data. Cited reasons include the hidden nature of the unsheltered population and natural exclusion of those unhoused at different points in the year, large year over year fluctuations raising questions about accuracy, and potential misalignment of HUD guidance and the goal of collecting accurate PIT count data.

¹⁰ The Institute of Community Alliances is a nonprofit organization providing technical assistance and training support for more than 4,000 HMIS database users in 14 states across the country. Per the ICA website, they support data-driven solutions and information systems that help communities address housing instability, homelessness, food insecurity and related issues.

While most planning attributes were verified through supporting documentation (tracking spreadsheets, emails, presentations, screenshots of system generated reports, etc.), the following planning attributes were only partially satisfied:

- Development of a PIT Count Plan: Housing Forward documents their *PIT Count Plan* in various documents and information systems, such as SimTech's *Regional Command Center*. There is no centralized planning document or tool that includes all required attributes of the PIT count planning process. This fragmentation of clearly defined planning activities increases the risk that key components of the plan will be omitted or not fully understood by all CoC stakeholders, making it more difficult to ensure accuracy and transparency of the PIT count process, and potentially creating heavy reliance on Housing Forward leadership for consistency in the future.
- Identification of Intent and Scope: Housing Forward's PIT count planning documentation describes the intent and scope of the count and days following the count as an effort to "obtain the annual census of individuals and families experiencing homelessness in sheltered and unsheltered situations on a single night in January" but does not define how this aligns with the determination of resource needs or other PIT count objectives. Per this HUD requirement, CoCs must decide the intent and scope of the count to "know what resources will be needed on the night of the count and determine how best to allocate available resources."

Point-in-Time (PIT) Count Timing

Section 578.3 of the CoC Program interim rule defines *Point-in-Time Count* as a "count of sheltered and unsheltered homeless persons carried out on one **night** in the **last 10 calendar days of January**... The term 'night' signifies a single **period of time from sunset to sunrise**, which spans two actual dates."

The 2024 HUD HIC/PIT Data Collection Notice also states CoCs will "be asked to report ... whether and how the CoCs statistically adjusted their count to account for **uncanvassed areas**."

Source: 2024 HUD HIC/PIT Count Data Collection

- Data and Time of the Count: For the 2024 PIT Count evaluated, Housing Forward's PIT Count planning documentation includes the date of the PIT Count as January 25th, 2024. We could not verify a start time specified in the planning documentation, nor could we verify documentation to support when the count was completed. It is feasible that a count with sufficient coverage could be completed before the required timeframe (see text box "PIT Count Timing") if either: (a) quality control procedures indicated all known areas of homelessness were sufficiently canvassed, or (b) the CoC had an approach for statistically adjusting their count for any uncanvassed areas. However, we could not verify through the documentation provided, including the approved 2024 methodology, that these procedures were defined and/or occurred.

In addition to PIT count planning requirements and guidelines, we analyzed all key requirements and guidance for the PIT count outlined by HUD in the areas of executing the sheltered and unsheltered count, data management, and PIT count reporting. All required attributes except those identified in the above observations were satisfied.

Opportunities for Improvement:

- 1.1** Ensure the most accurate and complete counting of veterans experiencing homelessness during the CoC's annual PIT count survey by requiring volunteers to ask question(s) of participating respondents to determine veteran status. As they continue to work with their survey vendor, Housing Forward should consider recording when a participating respondent declines to answer questions regarding their veteran status to increase transparency of final PIT count reporting results.
- 1.2** Ensure all PIT count planning activities and attributes required by HUD are defined and documented in a centralized *PIT Count Plan* available for review and reference by CoC members and stakeholders.

1.3 Ensure the *PIT Count Plan* includes defined resource needs aligned with the intent and scope of the PIT count, including any additional objectives of the CoC's PIT count such as outreach, engagement, screening, triage, and public engagement.

1.4 Ensure the timing for the night of the count is identified in the *PIT Count Plan* and the completion timeframe of an executed count is documented. Housing Forward should also consider defining quality control procedures in the *PIT Count Plan* to ensure known areas of homelessness are sufficiently canvassed and/or establishing an approach to statistically adjust the count to account for any uncanvassed areas.

Opportunity 02: Opportunities Exist to Improve the PIT Count, CoC Reporting Transparency, and Other CoC Best Practices

Our analysis of Housing Forward's practices compared to various sources highlighted opportunities to further improve the CoC's execution and reporting of PIT count results and other performance information, providing an overall increased understanding of the state of homelessness in and around the community.

We evaluated and compared the PIT count practices and performance reporting of Housing Forward and other national and peer CoCs to identify best practices in these areas. Specifically, we performed the following analysis (also see **Exhibit 5**):

- CoC Comparative Analysis of Publicly Available Information
- Peer CoC Comparative Analysis
- Peer CoC Dashboard Summary (for reference)

CoC Comparative Analysis of Public Information	Best Practices broadly identified via publicly available information such as other CoC public-facing websites and posted reporting
Peer CoC Comparative Analysis	Best practices regarding specific PIT Count activities, dashboards, and reporting identified from a survey of peer CoCs in comparable cities, including Atlanta, Austin, Houston, and Tarrant County
Peer CoC Dashboard Summary	A summary listing of measures reported by surveyed peer CoCs via performance dashboards for easy reference, available in Appendix E .

Exhibit 5: Sources of Comparative Analysis

Highlighted below are specific best practices that Housing Forward and the CoC should consider to improve the execution and reporting of the annual PIT count, while also increasing transparency in assessing the CoC's performance, its partners' efforts in addressing homelessness, and the overall status of the homeless response system.

CoC Comparative Analysis of Publicly Available Information

We first analyzed publicly available information from various national CoCs compared to Housing Forward to identify significant practices related to the reporting of the annual PIT count, methodologies, and other relevant information. While several practices aligned with those of Housing Forward, we identified the following opportunities for consideration:

- ✓ PIT Count Report Transparency

The *PIT Count Reports* of other CoCs, which are used to communicate count results, contained additional details not specifically found in Housing Forward's *PIT Count Report*. A summary of *PIT Count Report* practices and details is provided on the following page.

Exhibit 6: PIT Count Report Transparency

Common CoC PIT Count Report Practices Include:	Source	Details
<i>Specific accomplishments related to the CoC strategic plan</i>	CoCs in Tarrant County, San Antonio-Bexar County, and San Francisco	While Housing Forward reports summary outcomes in their annual <i>PIT Count Report</i> , they do not report specific accomplishments <i>related to the CoC's strategic plan</i> , reducing the community's understanding of progress towards solving homelessness ¹¹ .

¹¹ It is noted that Housing Forward provides specific accomplishments in their annual *State of Homelessness Address*. However, the *PIT Count Report* presents additional opportunity to provide more formal detail for those that do not watch the address, as this context isn't clear in presentation slides.

Common CoC PIT Count Report Practices Include:	Source	Details
<i>A regional or geographic representation of PIT Count Data</i>	CoCs in Tarrant County, San Francisco, and Seattle King County	Housing Forward does not report PIT count results by geographic region within Dallas and Collin County areas, reducing the community's understanding of areas of individuals experiencing homelessness.
<i>Specific challenges and resource needs for the annual PIT Count</i>	CoCs in Tarrant County and San Antonio-Bexar County	Housing Forward does not formally report challenges with conducting a complete and accurate PIT count or the need for additional resources, which may assist in improved planning efforts for the next count.
<i>Inherent Limitations of the PIT Count</i>	CoCs in Tarrant County, San Antonio-Bexar County, Houston, Atlanta, and Seattle King County	Many COCs report how to use the report and the inherent limitations of the PIT count, emphasizing PIT count data does not accurately depict the full homelessness story and describing efforts to increase the count accuracy. Housing Forward does not formally report any inherent limitations of the CoC's <i>PIT Count Methodology</i> , reducing the community's understanding of how to interpret the PIT count results.
<i>A glossary of definitions terminology and definitions specific to PIT Count processes and HUD requirements</i>	CoCs in Tarrant County, San Antonio-Bexar, and Seattle King County	Although Housing Forward's <i>PIT Count Report</i> includes a glossary of acronyms, it does not define key terminology commonly used in discussions about the PIT count, reducing the community's understanding of the PIT count framework and its purpose.

✓ **Monthly Counts of Unsheltered Individuals Located Downtown**

The Downtown San Diego Partnership, a nonprofit organization that advocates for the economic prosperity and cultural vitality of Downtown San Diego, performs and reports on a **monthly unsheltered count** broken down by the different **areas of their downtown**. The Dallas and Collin County areas do not have a similar method to continuously or periodically count unsheltered individuals, specifically in a high traffic area such as Downtown Dallas.

✓ **PIT Count Methodology Sampling Methods**

Per the 2024 HUD HIC/PIT Count Data Collection Notice, CoCs "should use **sampling and extrapolation methods** to account for areas that were not included in the unsheltered count, if there is any possibility an unsheltered person could be found there".

As an example, the King County Regional Homeless Authority (KCRHA) changed their *PIT Count Methodology* in 2022 after receiving approval from HUD to perform *Respondent Driven Sampling* (RDS). In 2024, the count was performed over several days, from January 22 through February 2, 2024, to survey individuals experiencing homelessness through a peer-to-peer recruitment effort that "uses existing social networks to generate a representative sample for surveys and data collection in which results are statistically extrapolated across the unsheltered population". While the latest research in this area is complex and ongoing, it may be advantageous to consider a statistical approach to supplement PIC count data in the future. This includes adhering to HUD requirements for uncanvassed areas.

Peer CoC Comparative Analysis



Our CoC Comparative Peer Analysis compared the PIT count and performance reporting practices of responsive peer CoCs, including the CoCs in Tarrant County, Houston-Harris County, Austin, and Atlanta areas, to those of Housing Forward and the All Neighbors Coalition. Summary themes and recommendations are provided in Exhibit 7 below, and the complete summary of CoC responses by survey question can be found in **Appendix D**.

Exhibit 7: Summary Themes from Peer CoC Comparative Analysis

Category	Summary Theme	Details	Recommendation
PIT Count Area Selection	Peer CoCs utilize numerous data sources to identify geographical areas where concentrations of individuals experiencing homelessness reside	Peer CoCs, including Housing Forward, identified input from outreach teams, 311, and historical data to inform areas of the unsheltered count. One peer CoC reported utilizing department data from their Neighborhood Police Officers, indicating law enforcement data may be helpful in identifying areas of homelessness concentration for the unsheltered count.	In addition to data already used to identify PIT count areas, Housing Forward should consider supplementing law enforcement data to further improve identification of concentrations of individuals experiencing homelessness.
PIT Count Volunteer Assessment	For peer CoCs, experienced volunteers and team leads are assigned to more complex or populated areas for survey	All peer CoCs assign experienced team members to survey areas of high concentration of individuals experiencing homelessness. Housing Forward also assigns at least one staff person from the homeless response system to the PIT teams. In addition, Housing Forward and one other peer CoC inquire disclosure of prior experience when signing up to volunteer.	Housing Forward currently aligns with peer best practices identified for assessing PIT count volunteers. No additional recommendations for consideration.
PIT Count Volunteer Training	Peer CoCs provide multiple training resources when preparing for the PIT Count	All peer CoCs indicated similar training resources when preparing for the PIT count, including survey protocols, safety, use of technology, and engagement strategies. One CoC also identified the practice of including a Neighborhood Police Officer for each volunteer group who is also trained prior to the count.	Housing Forward currently aligns with peer best practices identified for training PIT count volunteers, but should also consider the use of trained Neighborhood Police Officers from the Dallas Police Department to pair with each volunteer group.
Ongoing Reporting of Performance Metrics	Peer CoCs provide a host of details and measures via dashboards or other reports to communicate comprehensive status of the community's homeless response system	Peer CoCs report monthly or quarterly PIT counts and other data from HMIS and areas partners that Housing Forward does not report, specifically inflows of homelessness by type (including family and veterans), length of stay in the system, interactive system capacity and flow, and common definitions and terminology. ¹²	Housing Forward should consider incorporating additional measures with data available in HMIS to better communicate the status of the homeless response system in its dashboards or other frequent reporting. We provide a summary listing of peer CoC dashboard measures for reference in Appendix E .

¹² Like many CoCs, the All Neighbors Coalition/Housing Forward also provides *annual* data for inclusion in the System Performance Measurement Dashboard managed by Simtech Solutions. This dashboard acts as an “executive summary of regional activities by following the same performance measures that HUD requests in their annual reporting”. Our analysis of ongoing reporting of performance metrics does not include these dashboards as they only include annual data year over year and currently only go back to 2022.

Category	Summary Theme	Details	Recommendation
Annual Reporting of Performance Metrics	Peer CoCs provide information and performance data above HUD required information in their annual or biannual <i>PIT Count Report</i>	Peer CoCs report supplementary detail in their annual PIT count reports, including strategic outcomes, project results , average lengths of homelessness, resource gap assessments, outcomes by intervention type, and tracking of shifts in locations of homelessness. Housing Forward's annual report does not significantly report beyond the HUD required data and information (also refer to the <i>CoC Comparative Analysis of Publicly Available Information</i> regarding <i>PIT Count Report Transparency</i>).	Housing Forward should consider incorporating additional details and data in its annual <i>PIT Count Report</i> to ensure the community receives a more comprehensive understanding of the state of homelessness beyond the PIT count results.
PIT Count Survey Requirements	HUD-required information, such as demographic information and veteran status , are collected via required questions asked during the survey for most CoCs (respondents can elect not to provide the information)	Three of four peer CoCs require volunteers to ask at least one question regarding veteran status , and all CoCs include HUD-required data fields.	Refer to Observation C .
PIT Count Timeline	Peer CoCs have or are considering extending the timeline to collect PIT Count data to improve accuracy of the count	Two of four peer CoCs extend their timeframes for physically collecting PIT count data via survey, as approved by HUD: - One CoC collects data over three consecutive days and encourages volunteers to revisit their assigned area at least twice - One CoC performs day site visits at service providers for an additional week In addition, one CoC who conducts the PIT Count on a single night reported an upcoming change to their PIT Count timeframe to improve count accuracy.	Housing Forward should consider changes to their timeline of the annual PIT count, as approved by HUD. This may include multiple consecutive days of the count or additional site visits over a period of time to improve accuracy of the count.

Opportunities for Improvement:

2.1 Provides additional details that increase transparency of the annual *PIT Count Report*, even if they aren't specifically required by HUD. This includes:

- Communicating results in alignment with the CoC's strategic plan in the formal report to increase the community's understanding of progress towards its initiatives
- Including regional or geographic representations of PIT count data to increase the community's awareness of locations or shifts in concentrated areas of individuals experiencing homelessness
- Communicating PIT count challenges, lessons learned, or resource needs to improve community awareness and planning efforts for the next PIT Count

- Communicating the inherent limitations of the PIT count process and efforts to improve count accuracy to ensure the community understands how to interpret PIT count results
- Providing a glossary of definitions and terminology frequently used when communicating results of the PIT Count to improve the community's conceptual understanding of the purpose and results of the count

2.2 Works with community partners to consider a periodic count specifically targeting the various sections of the Downtown Dallas area, known to be a high traffic area for individuals experiencing homelessness. This may assist the community with understanding shifts in the unsheltered counts and location for the downtown area.

2.3 Considers incorporating statistical sampling and extrapolation methods, at a minimum, for areas that were not included in the unsheltered count if there is any possibility of an unsheltered person in an uncanvassed area.

2.4 Considers peer CoC best practices regarding:

- Identification of concentrations of individuals experiencing homelessness for purposes of the PIT count, including the addition of law enforcement data, as available
- The use of trained community neighborhood police officers to pair with volunteer groups to enhance skill, safety, and confidence of the group
- Incorporating additional data available in HMIS on the CoCs dashboard metrics or other frequent reporting to better communicate the status of the homeless response system on an ongoing basis (also refer to **Appendix E** for summary of common peer CoC dashboard measures)
- Incorporating additional data and metrics in its annual *PIT Count Report* to improve the community's understanding of the state of homelessness beyond the results of the PIT count. This may include information regarding strategic outcomes, project results, average lengths of homelessness, resource gap assessments, and tracking of shifts in locations of homelessness (also refer to recommendation **2.1**).
- Extending the timeline to collect PIT count data, as approved by HUD, to improve accuracy of the count

Appendices

- Appendix A: City of Dallas OHS Executed Contracts Per Strategy Track
- Appendix B: Housing and Urban Development (HUD) PIT Count Requirements
- Appendix C: Housing and Urban Development (HUD) PIT Count Suggested Guidance
- Appendix D: Peer Continuum of Care (CoC) Survey Responses
- Appendix E: Common Public Dashboard Performance Metrics Reported by Peer CoCs
- Appendix F: Criteria
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Appendix A: City of Dallas OHS Executed Contracts Per Strategy Track

The following table depicts the OHS Four-Track Strategy tracks and associated contracts, including those evaluated by auditors in each track. The total amounts spent per contract is as of November 7th, 2024. Information was derived from documents received and walkthroughs with OHS management.

Exhibit 8: City of Dallas Office of Homeless Solutions - Executed Contracts Per Strategy Track

Strategy Track		External Partner	Program	Funding Source	Amount	Contract Term	Contracted Amount Spent to Date	Percent of Total Amount Spent
Track 1	Track 1: Increase Shelter Capacity	Bridge Steps	Pay to Stay	General Fund	\$219,000 annually	Oct 22 - Sept 23	\$219,000	100%
						Oct 23 - Sept 24	\$219,000	100%
		United Way Metro. Dallas	Capacity Building Program	General Fund	\$1,000,000	June 23 - June 25	\$312,067	31%
Track 2	Track 2: Temporary Inclement Weather Shelters	Fair Park First	Temporary Inclement Weather Shelter (TIWS) Program	General Fund	\$234,040	Not evaluated for audit		
		Austin Street Center	Temporary Inclement Weather Shelter (TIWS) Program	General Fund	\$750,714	Jan 24 - Dec 24	\$643,838	86%

Strategy Track		External Partner	Program	Funding Source	Amount	Contract Term	Contracted Amount Spent to Date	Percent of Total Amount Spent
Track 3	Track 3: Subsidized Supportive Housing	CitySquare	Landlord Subsidized Leasing Program	General Fund	\$650,000 annually	Oct 22 – Sept 23	\$532,473	82%
						Oct 23 – Sept 24	\$608,169	94%
		Bridge Steps	Homeless Diversion	General Fund	FY22-23 - \$120,000	July 22 – June 23	\$120,000	100%
					FY23-24 - \$118,500	July 23 – June 24	\$118,500	100%
		First Presbyterian Church dba (The Stewpot)	Homeless Diversion	General Fund	FY22-23 - \$82,500	Oct 22 – Sept 23	\$82,500	100%
					FY23-24 - \$124,232	Oct 23 – Sept 24	\$106,908	86%
		DFW Economic Solutions	Homeless Diversion	General Fund	FY22-23 - \$93,750	Not evaluated for audit		
					FY23-24 - \$75,000			
		Catholic Charities of Dallas	Supportive Housing for Seniors	General Fund	\$250,000 annually	Oct 22 – Sept 23	\$227,835	91%
						Oct 23 – Sept 24	\$233,589	93%
		Dallas Housing Authority (DHA)	Real-Time Rehousing Initiative	1. ESG Cares Act 2. State and Local Fiscal Recovery Fund 3. HOME Investment Partnerships American Rescue Plan Program	\$31,421,839	Not evaluated for audit		

Strategy Track		External Partner	Program	Funding Source	Amount	Contract Term	Contracted Amount Spent to Date	Percent of Total Amount Spent
Track 3	Track 3: Subsidized Supportive Housing	Housing Forward	Real-Time Rehousing Initiative	1. ESG Cares Act 2. State and Local Fiscal Recovery Fund 3. HOME Investment Partnerships American Rescue Plan Program	\$17,491,778	Oct 21 – Sep 25	\$16,019,527	92%
		Housing Forward	Master Leasing Program	General Fund	\$3,000,000	June 23 - June 25	\$52,326	2%
		Housing Forward	RTR Outreach Contract Service -16 FTEs	General Fund	\$2,354,314	Feb 24 – Sept 25	\$1,707	0%
Track 4	Track 4: Investments in Facilities Combatting Homelessness	No Contracts Executed in this Track						

Appendix B: Housing and Urban Development (HUD) PIT Count Requirements

The table below illustrates our evaluation of the PIT count practices currently performed by Housing Forward, the lead CoC agency for Dallas and Collin County, compared to the PIT count requirements specified by the Department of Housing and Urban Development (HUD).

Exhibit 9: Evaluation of Housing Forward Practices vs HUD PIT Count Requirements

No.	HUD Requirements			Compliant?	
	PIT Count Phase	Specified Requirement	Source	Yes/No/Partial	
1	General PIT Count Parameters	Standard No. 1: CoCs are responsible for planning and conducting, at least biennially, a PIT count of homeless persons within the geographic area that meets HUD's requirements.	PIT Count Methodology Guide	Yes	
2		Standard No. 2: The sheltered and unsheltered PIT counts must be conducted during the last 10 days in January and represent all homeless persons who were sheltered and unsheltered on a single night during that period.	HIC/PIT Count Data Collection Notice	Yes	
3		Standard No. 3: The final PIT count methodology must be approved by the CoC in accordance with the CoC's governance charter.	PIT Count Methodology Guide	Yes	
4		Standard No. 4: All CoCs should consult and collaborate with all Consolidated Plan jurisdictions in the geographical boundary of the CoC... to assist the jurisdictions in submitting PIT count data that is relevant to completing their Consolidated Plans.	PIT Count Methodology Guide	Not evaluated	
5	Planning the PIT Count - Required PIT Count Planning Actions	Development of a PIT Count Plan CoCs must develop a PIT count plan to ensure that the PIT count meets all the HUD-required minimum standards and collects the required PIT count data. The plan should address the following:	PIT Count Methodology Guide PIT Count Planning Worksheet Guideline	Partial – See Observation C	Housing Forward's <i>PIT Count Plan</i> is not defined in a comprehensive document but fragmented across various documents, information systems, and tools. Auditors confirmed that Housing Forward satisfied the required PIT count activities and processes outlined in the HUD requirements through various documentation as available (see items 5a –5j below).

No.	HUD Requirements			Compliant?	
	PIT Count Phase	Specified Requirement	Source	Yes/No/Partial	
5	Planning the PIT Count - Required PIT Count Planning Actions	a. PIT Count committee membership, roles, and responsibilities related to implementing a successful count to completion	PIT Count Methodology Guide PIT Count Planning Worksheet Guideline	Yes	We verified the COC Workgroup and its members through other supporting documentation. Housing Forward's PIT count planning documentation lists several workgroup meetings to discuss roles and responsibilities to aid in the PIT count as a major task/activity.
5		b. The intent and scope of the activities on the night of the count and days following the count. CoCs must decide the intent and scope of the count to know what resources will be needed on the night of the count and to determine how best to allocate those available resources.	PIT Count Methodology Guide PIT Count Planning Worksheet Guideline	Partial Satisfaction	Housing Forward's PIT count planning documentation and methodology includes the overall the intent and scope of the PIT count but does not align resource requirements.
5		c. Date and time for the count: Section 578.3 of the CoC Program interim rule defines Point-in-Time Count as a "count of sheltered and unsheltered homeless persons carried out on one night in the last 10 calendar days of January or at such other time as required by HUD." The term 'night' signifies a single period of time from sunset to sunrise , which spans two actual dates.	PIT Count Methodology Guide PIT Count Planning Worksheet Guideline HIC/PIT Count Data Collection Notice	Partial Satisfaction	Housing Forward's PIT count planning documentation includes the date of the PIT count as January 25th, 2024 but does not include the period of time on the night of the PIT count as required by HUD. We could not verify the 2024 count occurred in the specified period of time.
5		d. Methodologies for the sheltered and unsheltered count, including enhanced approaches for hard to count geographies and subpopulations	PIT Count Methodology Guide PIT Count Planning Worksheet Guideline	Yes	We verified Housing Forward's PIT count sheltered and unsheltered methodologies through supporting documentation.

No.	HUD Requirements			Compliant?	
	PIT Count Phase	Specified Requirement	Source	Yes/No/Partial	
5	Planning the PIT Count - Required PIT Count Planning Actions	e. A plan for data quality and deduplication for the PIT count.	PIT Count Methodology Guide PIT Count Planning Worksheet Guideline	Yes	We verified the data quality plan, including the data cleaning procedures for unsheltered and sheltered data through supporting documentation.
5		f. Identification and confirmation of locations to count sheltered and unsheltered persons	PIT Count Methodology Guide	Yes	We verified identification of PIT count locations to count sheltered and unsheltered persons through supporting documentation.
5		g. Survey development CoCs must decide what information to gather during the PIT count and how the information will be collected.	PIT Count Methodology Guide PIT Count Planning Worksheet Guideline	Yes	We verified survey development through supporting documentation and discussion with Housing Forward of the annual process to discuss the PIT count survey instrument, including survey questions, HUD requirements, and the language of the survey.
5		h. Volunteer roles, recruitment, and training	PIT Count Methodology Guide PIT Count Planning Worksheet Guideline	Yes	We verified PIT count training and corresponding training materials through supporting documentation.
5		i. The role and acquisition of incentives	PIT Count Methodology Guide	Yes	Housing Forward's PIT count planning documents do not list out the incentives as described in HUD requirements, however we verified Housing Forward's PIT count incentives through other supporting documentation.
5		j. Publicizing the count	PIT Count Methodology Guide	Yes	Housing Forward's <i>PIT Count Plan</i> does not describe communication strategies after conducting the count as described in HUD requirements. We verified Housing Forward's methods to publicize and communicate the PIT count through other supporting documentation.

No.	HUD Requirements			Compliant?	
	PIT Count Phase	Specified Requirement	Source	Yes/No/Partial	
5	Planning the PIT Count - Required PIT Count Planning Actions	Standard No. 14: CoCs are required to ensure that people conducting the PIT count, including project staff and community volunteers, are appropriately trained in count standards, data collection procedures, and protocols for privacy, security, and personal safety.	PIT Count Methodology Guide	Yes	
6	Executing the Sheltered Count	Standard No. 7: CoCs must be able to verify that the sheltered homeless people identified in the count are sheltered on the night designated for the count, as defined at 24 CFR 578.3 of the Homeless Definition Final Rule	PIT Count Methodology Guide	Yes	
7		Collecting key individual data CoCs must report data on the gender, race, and ethnicity for all sheltered and unsheltered persons... CoCs must also collect and report data on veterans, including the total number of veteran households, the total number of veterans, the total number of persons in veteran households, and the gender, race, and ethnicity of veterans. 1. Gender of the individual 2. Race of the individual 3. Ethnicity of the individual 4. Veteran Status	HIC/PIT Count Data Collection Notice	Partial – See Observation C	Veteran status was not a required question for volunteers to ask survey respondents in the CoC's sheltered count survey tool within the Counting Us mobile app for 2024.
8		Standard No. 13: Surveys of people for the sheltered or unsheltered count must be administered in a manner that protects participant privacy and safety, as well as the safety of the person completing the survey.	PIT Count Methodology Guide	Yes	
9		Standard No. 8: CoCs should use client data already collected and entered in HMIS as the primary data source for the sheltered PIT count for emergency shelter, Safe Haven, and transitional housing projects that participate in HMIS.	PIT Count Methodology Guide	Yes	

No.	HUD Requirements			Compliant? Yes/No/Partial
	PIT Count Phase	Specified Requirement	Source	
10	Executing the <u>Sheltered</u> Count	Accounting for Sheltered Data not in HMIS Some CoCs might not have sufficient coverage rates or data completeness in their HMIS to use it as the primary data source for the sheltered PIT count. In such cases, CoCs must use project- or client-level surveys to gather data about number and characteristics of their sheltered homeless population.	PIT Count Methodology Guide	Yes
11	Executing the <u>Unsheltered</u> Count	Established Interview Procedure Once the geography for the count is identified, CoCs must also determine whether to collect the required information from all persons encountered or a sample of persons encountered during the count.	PIT Count Methodology Guide	Yes
12		Defined Geographic Area CoCs must first determine if they can cover their entire jurisdiction in the unsheltered count or whether they must select a sample of geographic areas to cover.	PIT Count Methodology Guide	Yes
13		Standard No. 9 and 10: CoCs must account for and report on all unsheltered homeless people residing in the CoC's geography through a census or one or more sampling and extrapolation methods that are consistent with HUD standards and guidance. CoCs must document the criteria and decision-making process used to identify and exclude specific geographic areas.	PIT Count Methodology Guide	Yes
14		Standard No. 11: CoCs must be able to verify that the unsheltered homeless people identified in the count are unsheltered on the night designated for the count, as defined at 24 CFR 578.3.	PIT Count Methodology Guide	Yes
15		Standard No. 13: Surveys of people for the sheltered or unsheltered count must be administered in a manner that protects participant privacy and safety, as well as the safety of the person completing the survey.	PIT Count Methodology Guide	Yes

No.	HUD Requirements			Compliant?	
	PIT Count Phase	Specified Requirement	Source	Yes/No/Partial	
16	Executing the <u>Unsheltered</u> Count	Collecting key individual data CoCs must report data on the gender, race, and ethnicity for all sheltered and unsheltered persons... CoCs must also collect and report data on veterans, including the total number of veteran households, the total number of veterans, the total number of persons in veteran households, and the gender, race, and ethnicity of veterans. 1. Gender of the individual 2. Race of the individual 3. Ethnicity of the individual 4. Veteran Status	HIC/PIT Count Data Collection Notice	Partial – See Observation C	Veteran status was not a required question for volunteers to ask survey respondents in the CoC's unsheltered count survey tool within the <i>Counting Us</i> mobile app for 2024.
17	PIT Count Data Management	Establish a procedure to void, destroy, or omit unreadable, duplicate, or erroneous survey data	PIT Count Methodology Guide	Yes	
18		Standard No. 12: CoCs must ensure that during the PIT count homeless persons are only counted once.	PIT Count Methodology Guide	Yes	
19		Submission of Data to HUD Verify that the CoC submitted all PIT Count data through the HUD Homelessness Data Exchange (HDX) during the spring timeframe	PIT Count Methodology Guide	Yes	
20	PIT Count Reporting	CoCs must report the sheltered counting methodology(s) utilized A. Data sources used to complete the count B. Sampling strategy utilized C. Deduplication approaches used	HIC/PIT Count Data Collection Notice	Yes	

No.	HUD Requirements			Compliant? Yes/No/Partial
	PIT Count Phase	Specified Requirement	Source	
21	PIT Count Reporting	Standard No. 6: CoCs must account for and report on all sheltered homeless people residing in the CoC through a census (complete coverage) or one or more sampling and extrapolation methods that are consistent with HUD standards and guidance. <i>HUD will evaluate the nature and basis for estimation and extrapolation of CoCs' sheltered count in the annual CoC Program Competition.</i>	PIT Count Methodology Guide	Yes
22		CoCs must report the unsheltered counting methodology(s) utilized A. Strategy of unsheltered count used B. Whether and how the CoCs statistically adjusted their count to account for uncanvassed areas C. De-duplication approaches used	HIC/PIT Count Data Collection Notice	Yes
23		Verify that the CoCs reported the reasons for any changes in the PIT Count from prior year, including: A. Sheltered count changes B. Unsheltered count changes	PIT Count Methodology Guide	Yes
24		Standard No. 5: CoCs must provide PIT count data to the entity(s) responsible for the Consolidated Plan jurisdiction(s) associated with the CoC.	PIT Count Methodology Guide	Yes

Appendix C: Housing and Urban Development (HUD) PIT Count Suggested Guidance

The table below illustrates our evaluation of the PIT Count practices currently performed by Housing Forward, the lead CoC agency for Dallas and Collin County, compared to HUD suggested guidance that while not mandated by HUD, contribute to enhancing the accuracy and completeness of the PIT Count.

Exhibit 10: Evaluation of Housing Forward Practices vs HUD PIT Count Guidance

No.	HUD Suggested Guidance			Satisfactory? Yes/No
	PIT Count PIT Count	Specified Guidance	Source	
1	Planning the PIT Count - Suggested Planning Activities	Establish a PIT Count Timeline	PIT Count Methodology Guide	Yes
2		Involve key community partners in planning efforts	PIT Count Methodology Guide	Yes
3		Secondary review of the survey instrument(s)	PIT Count Methodology Guide	Yes
4		Protocol for informing volunteers if any guidance has changed since the training was provided	PIT Count Methodology Guide	Yes
5	Executing the Sheltered Count	Maximize HMIS Data Quality for the Sheltered PIT Count Established procedure to perform routine data quality monitoring to ensure sufficient data quality	PIT Count Methodology Guide	Yes
6	Executing the Unsheltered Count	Planning the Geographic Area Informed and reasonable basis for identifying the known locations where unsheltered people may be residing to inform unsheltered PIT count procedures	PIT Count Methodology Guide	Yes
7		Personnel Executing the Unsheltered Count Verify that volunteers and staff executing the unsheltered count have relevant experience either with homelessness issues or with data collection.	PIT Count Methodology Guide	Yes

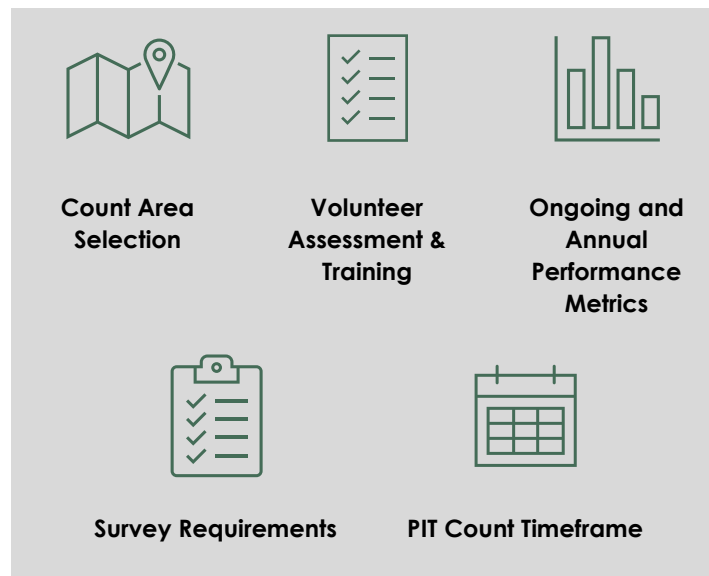
No.	HUD Suggested Guidance			Satisfactory? Yes/No
	PIT Count PIT Count	Specified Guidance	Source	
8	PIT Count Data Management	Collecting data - Data Intake Establish procedures to collect/handle the data gathered by volunteers to ensure data integrity and confidentiality	PIT Count Methodology Guide	Yes
9		Cleaning the Data Verify that a review procedure(s) has been established by the CoC to validate completeness and clarity of data	PIT Count Methodology Guide	Yes
10		Criteria for identifying a 'homeless person' are accurately met	PIT Count Methodology Guide	Yes
11		Verifying that the survey includes geographic identifiers	PIT Count Methodology Guide	Yes
12		PIT Count Survey: Each field eliciting 1 answer has only 1 answer	PIT Count Methodology Guide	Yes
13		Data Entry Data submission/entry procedure(s) has been established by the CoC to ensure consistency of data entry processes	PIT Count Methodology Guide	Yes
14		Data Security and Safeguarding Destroy any physical copies of the data once it has been entered into the database	PIT Count Methodology Guide	Yes
15		Sheltered Count - Data Validation check Because the PIT and HIC data must match, it is critical that CoCs conduct their PIT count and HIC at the same time	PIT Count Methodology Guide	Yes
16	PIT Count Reporting	Utilize the PIT Count Data to provide feedback and action changes to the current homeless response system	PIT Count Methodology Guide	Yes

Appendix D: Peer Continuum of Care (CoC) Survey Responses

The following includes key results of a survey of six comparable peer CoCs performed in October 2024. The purpose of the survey was to assess the PIT count methodologies and best practices of comparable cities and high performing CoC functions.

Survey Methodology

We composed targeted questions related to the audit's objective to ensure accurate and complete counts of individuals experiencing homelessness to compare against other comparable CoCs in the following categories:



- We selected respondents after conducting initial research and walkthroughs with Housing Forward personnel to gain an understanding of the comparable CoCs to the All Neighbors Coalition (CoC for TX-600 Dallas and Collin County, Irving)
- We contacted a representative from each city to explain the purpose of the survey and how we will use the results
- We sent the survey to six recipient CoCs and received the following completed responses to the survey:

City	CoC
Atlanta	Partners for Home
Austin	ECHO
Houston-Harris County	Coalition for the Homeless of Houston (CFTH)
Tarrant County	Partnership Home

Analysis Methodology

We compiled all CoC responses and performed qualitative analysis to compare and contrast peer CoC PIT count practices to those of Housing Forward. Housing Forward's defined PIT count practices were derived from documentation and support provided by Housing Forward.

Key Survey Results

The following table contains compiled survey results used for the qualitative analysis of Housing Forward's current PIT count practices compared to responsive surveyed peer CoCs. Please refer to **Observation D** for the results of our analysis¹³.

Exhibit 11: Summary of Peer CoC Survey Responses

Survey Question	Housing Forward Practices	Tarrant County Partnership Home	Houston CFTH/The Way Home	Austin ECHO	Atlanta Partners for Home
		CoC SUMMARY RESPONSE			
1. To inform on the unsheltered count, what is your CoC's processes or procedures to identify geographical areas where significant numbers of individuals experiencing homelessness reside?	Housing Forward uses input from Street Outreach staff and prior PIT count data to categorize geographic areas into three tiers, with "Tier 1 Zones" having the highest concentrations of individuals experiencing homelessness. The COD OHS Program Administrator runs a 311 report on homeless encampment service requests from the past 90-120 days to inform count locations.	The following data helps identify geographic regions: prior year data, location data in HMIS from outreach contacts made throughout the year, police department data from Neighborhood Police Officers, data from the MYFW app where people report encampments to the city, and meetings with outreach teams.	The Counting Us app divides the extensive geography into manageable grid maps. These grids are assigned based on input from outreach teams and historical data to identify areas with concentrations of individuals experiencing homelessness.	Inherent in Austin, unhoused neighbors are more concentrated nearer to downtown due to the number of services/shelters available in the area.	311 data and outreach teams are used to identify higher homelessness concentrations.
2. What is your CoC's process or procedure to assign volunteers to specific PIT Count areas and/or PIT Count groups?	Street Outreach workers, best equipped to effectively engage with people experiencing unsheltered homelessness, are assigned to Tier 1 Zones. Homeless system staff are paired with community volunteers to canvass less populated Tier 2 and Tier 3 zones.	A tiering system is used. If a route that is heavily populated or it is known a specific skill level is needed, the CoC will assign an outreach team or experienced group of volunteers.	Trained outreach teams, comprising over 30 teams and 150 members experienced in engaging with unsheltered populations, are assigned to areas with high concentrations of individuals experiencing homelessness.	Prior PIT Count data inform PIT count areas and volunteer assignments.	The CoC asks volunteers if they have a PIT Count area preference and include outreach system workers in their counts. The CoC puts seasoned PIT count volunteers with first-time team leads so the lead is more comfortable and prepared in the field.

¹³ Please note: Other than publicly available dashboard and reporting information, peer CoC responses were not further validated. Housing Forward practices were validated throughout the audit.

Survey Question	Housing Forward Practices	Tarrant County Partnership Home	Houston CFTH/The Way Home	Austin ECHO	Atlanta Partners for Home
		CoC SUMMARY RESPONSE			
3. How does your CoC assess the experience of volunteers prior to the PIT Count?	Housing Forward has a database of volunteer names from the Counting Us App. The database lists volunteers' previous participation, if they are an employee of the CoC, and if they are an outreach worker , indicating that Housing Forward assesses volunteer experience to gather this information. The 2025 PIT Count sign-up sheet also included these questions.	Experienced outreach teams are assigned to heavily populated routes.	The CoC identifies experienced team members when assigning areas for survey.	Each volunteer is asked to disclose if they've participated in a PIT count before .	The CoC identifies seasoned team members when assigning areas for survey.
3a. To what degree is training provided?	Housing Forward provides the following training, updated yearly: 1. Conducting the Survey and Addressing Sensitive Topics 2. Counting Us app includes reference material to set up the app to access the survey 3. PIT Count Training Video , including how to ask questions, count safety, privacy, purpose of PIT count, and how to record data in <i>Counting Us</i> application.	Initial online training when volunteers sign up and training for volunteers the night of the count. A Neighborhood Police Officer accompanies each volunteer group . The officers are provided training three weeks prior to the count .	Training sessions cover survey protocols, engagement strategies, safety considerations, and the use of the Counting Us app . Volunteers who do not complete training are removed from the participant list.	Each volunteer and Team Lead is required to attend a training session reviewing how to use the Survey Application, Safety, and Best Practices for conducting the survey . The CoC also provides a review of homelessness in Austin and why we do the count.	The CoC offers a team lead training, two general trainings for night count volunteers, and a training for the day of the site count . All trainings are virtual and recorded .

Survey Question	Housing Forward Practices	Tarrant County Partnership Home	Houston CFTH/The Way Home	Austin ECHO	Atlanta Partners for Home
		CoC SUMMARY RESPONSE			
4. What additional measures or performance metrics, if any, does your CoC report other than the PIT count to inform the public regarding the state of homelessness in your community? <i>Please refer to the Peer CoC Dashboard Analysis in Appendix E for a reference of common public dashboard measures collected by responsive peer CoCs and Housing Forward.</i>	Housing Forward currently reports a community-wide dashboard detailing housing placements and returns to homelessness, including details regarding project type, gender, age, and racial demographics¹⁴. The dashboard does not include information regarding <u>entries</u> to homelessness or <u>family</u> and <u>veteran</u> homelessness.	Tarrant County has actively worked to move away from the PIT count as the sole measuring tool for the state of homelessness. The CoCs dashboard provides monthly point in time counts of newly homeless and average households homeless per day, housings, and quarterly reporting of the number of people housed and experiencing homelessness broken down by individuals, families, and veterans.	The CoC provides monthly data reports from HMIS with numerous metrics: the number of individuals entering (new client enrollments) and exiting homelessness, length of stay, housing placements, and returns to homelessness. Additional detail is provided regarding income amounts and sources, housing retention and move-ins, people served by veteran status.	The CoC publishes monthly updates regarding individuals who accessed the system (with charts that show a further breakdown on usage by intervention type)¹⁵. Also reported are total enrollments for past 12 months by project and demographic, interactive system capacity by type and number of beds, move ins by project name and type, and data regarding family homelessness. In addition, the CoC reports a 'System Flow', measuring how many people go through coordinated entry and how long it takes to go through the entry process in each month. The dashboard also provides numerous definitions and terminology for community understanding.	Other than HUD required reporting, Atlanta's dashboard also reports metrics on monthly inflow vs. outflow of individuals, coordinated entry status by partner organization, and exits by program type that can be broken down by chronic, veteran, youth, or family homelessness. Atlanta Shelter availability is also reported. The dashboard provides numerous definitions and terminology for community understanding.

¹⁴As of January 24, 2025, Housing Forward reported average number of days between referral and housing move-in. As of February 11, 2025, this information was no longer available on the dashboard.

¹⁵ We noted that as of February 11, 2025, Austin ECHO has not updated their dashboard since October 2024.

Survey Question	Housing Forward Practices	Tarrant County Partnership Home	Houston CFTH/The Way Home	Austin ECHO	Atlanta Partners for Home
		CoC SUMMARY RESPONSE			
5. What additional measures or performance metrics, if any, does your CoC annually report along with the PIT count results?	Housing Forward reports their annual 2024 State of Homelessness address which includes information reported in their annual <i>PIT Count Report</i>. Housing Forward's 2024 <i>PIT Count Report</i> includes the data required by HUD, including HIC, PIT Count numbers (sheltered and unsheltered), individuals experiencing chronic homelessness, veterans, unaccompanied youth, and demographics.	In addition to PIT count results, the CoC reports: 1. Number of households housed 2. Funding secured for capital and services 3. Utilization of housing resources 4. Number of landlord partners 5. Accomplishments (new housing assessment tool, hours of training provided, national recognition, etc.) 6. Outcomes by specific interventions: diversion, outreach, shelter, safe haven, transitional housing, rapid exit, shallow subsidies, rapid rehousing, and PSH.	The Houston CoC complements PIT count results with other data to provide comprehensive analysis. This includes system performance measures such as housing placement rates, lengths of homelessness, and returns to homelessness.	ECHO publishes an annual Needs and Gaps report that analyzes how individuals experiencing homelessness utilize the Homelessness Response System and what gaps remain. ECHO also publishes an annual Racial Disparities report that looks at how racial inequity affects Black and brown communities.	The CoC shares additional metrics to provide context and insights, such as HIC information, trends in specific sub populations, and tracking of shifts in where individuals are staying.
6. What data fields are required in your CoC's PIT count Survey? Is veteran status a required data field?	According to the 2024 <i>PIT Count Survey</i> via the <i>Counting Us</i> App, the survey contains questions required by HUD. However, veteran status was not a required question for volunteers to ask while performing the survey.	Yes, it is required; veteran status is included in the survey.	The Houston CoC adheres to HUD's required data fields for the PIT count survey, including demographic information, veteran status, chronic homelessness, and household composition. Additionally, the CoCs survey incorporates region-specific questions to address local priorities.	It is required that veteran status is asked, but we allow clients to refuse to answer the question.	Veteran status is not a required answer.

Survey Question	Housing Forward Practices	Tarrant County Partnership Home	Houston CFTH/The Way Home	Austin ECHO	Atlanta Partners for Home
		CoC SUMMARY RESPONSE			
7. How many hours is the count typically conducted and what is the timeframe?	The PIT Count is the annual census of individuals and families experiencing homelessness in sheltered and unsheltered situations on a single night in January. A specific timeframe for the 2024 PIT count could not be determined.	The goal is to deploy volunteers by 8pm. Most are back by 10:30pm, but some stay out as late as 1:30am. Heavily populated routes have multiple groups surveying the area.	With HUD's approval, the count spans three consecutive days to accommodate the vast geography of the region. Each day begins at 6:30am with volunteers checking in at designated locations. Volunteers are encouraged to thoroughly survey their assigned areas, revisiting them at least twice to ensure accuracy.	The count is completed over the course of one night. Though it should be noted the CoC will likely be changing this methodology in the future.	Atlanta conducts their night count on the last Monday night January starting around 8 PM. We perform day site counts at various service providers starting that following Tuesday until the following Monday (an entire week).



Appendix E: Common Public Dashboard Performance Metrics Reported by Peer CoCs

We assessed the public performance dashboards of four responsive Continuum of Cares (CoCs) surveyed as well as the dashboard available from the All Neighbors Coalition, led by Housing Forward (5 CoCs in total). As a result, we identified commonly reported information and measures to enhance transparency and the public understanding of the state of homelessness in each community. The table below may be referenced for consideration of measures to include on public dashboards to monitor progress on reducing and solving homelessness.



Source: Simtech Solutions Sample Dashboard

Exhibit 12: Common Peer CoC Public Dashboard Performance Measures

No.	Common Dashboard Measures Reported by Peer CoCs	CoCs with Dashboard Measure	Number of CoCs with Dashboard Measure (Out of 5)
1.	New Client Enrollments, New Entry into Homelessness, or Monthly/Quarterly Trends in Homelessness	- Tarrant County Partnership Home - Houston CFTH - Austin ECHO - Atlanta Partners for Home	4/5
2.	Unhoused Counts Specific to Veterans	- Tarrant County Partnership Home - Houston CFTH - Atlanta Partners for Home	3/5
3.	Unhoused Counts Specific to Families	- Tarrant County Partnership Home - Houston CFTH - Austin ECHO - Atlanta Partners for Home	4/5
4.	Count of Active Individuals in Coordinated Entry System	- Austin ECHO - Atlanta Partners for Home	2/5
5.	Total Number of Individuals Placed in Housing (including demographics)	- Housing Forward - Tarrant County Partnership Home - Houston CFTH - Austin ECHO - Atlanta Partners for Home	5/5
6.	Length of Stay or Time to Obtain Housing/System Flow Time	- Housing Forward - Houston CFTH - Austin ECHO - Atlanta Partners for Home	4/5
7.	Returns to Homelessness	- Housing Forward - Houston CFTH - Austin ECHO - Atlanta Partners for Home	4/5

No.	Common Dashboard Measures Reported by Peer CoCs	CoCs with Dashboard Measure	Number of CoCs with Dashboard Measure (Out of 5)
8.	Project or Intervention Type/Type of Housing	1. Housing Forward 2. Tarrant County Partnership Home 3. Houston CFTH 4. Austin ECHO 5. Atlanta Partners for Home	5/5
9.	Shelter Capacity/Availability	1. Austin ECHO 2. Atlanta Partners for Home	2/5

Appendix F: Criteria

We reviewed the following sources to form the basis for the observations detailed elsewhere in this Report:

- City of Dallas *Charter and Code of Ordinances, Administrative Directives*, and other policies and procedures
- United States Department of Housing and Urban Development *Continuum of Care Program Guidelines and Requirements*:
 - HUD PIT Count Methodology Guide
 - 2024 HUD HIC/PIT Count Data Collection Notice
 - HUD PIT Count Planning Worksheet & Model Surveys
 - HUD Performance Measurement for Service Coordinators
 - HUD's PIT Count Planning Worksheet
- All Neighbors Coalition/Housing Forward PIT Count Methodology
- Government Accountability Office (GAO) January 2020 Report “Better HUD Oversight of Data Collection Could Improve Estimates of Homeless Population”
- The Committee of Sponsoring Organizations of the Treadway Commission (COSO) *Internal Control—Integrated Framework*
- Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government*

Appendix G: Risk Rating Definitions

Residual risk is the risk derived from the environment after considering the mitigating effect of internal controls. The area under audit has been assessed from a residual risk level utilizing the following risk management classification system.

HIGH

High risk observations have qualitative factors that include, but are not limited to:

- Events that threaten the City's achievement of strategic objectives, performance goals, effective service delivery, or continued existence
- Impact of the finding could be felt outside of the City or beyond a single function or department
- Potential material impact to operations or the City's finances
- Remediation requires significant involvement from executive management and/or City Council

MODERATE

Moderate risk observations have qualitative factors that include, but are not limited to:

- Events that could threaten strategic or performance objectives of the City
- Impact could be felt outside of the City or across more than one function of the City
- Noticeable and possibly material impact to the operations or finances of the City
- Remediation efforts that will require the direct involvement of functional leader(s) and may require executive management

LOW

Low risk observations have qualitative factors that include, but are not limited to:

- Events that do not directly threaten the City's strategic priorities
- Impact is limited to a single function within the City
- Minimal financial or operational impact to the organization
- Remediation requires functional leader(s) to be kept updated, or have other controls that help to mitigate the related risk

Appendix B: Management's Response

Memorandum



DATE: June 13, 2025
TO: Mark S. Swann – City Auditor
SUBJECT: Audit of Homeless Response System Strategy and Coordination

This letter acknowledges the City Manager's Office received the *Audit of Homeless Response System Strategy and Coordination* and submitted responses to the recommendations in consultation with the Office of Homeless Solutions (OHS).

City management appreciates the work of the auditor in recommending solutions or validating process improvements previously identified and in process in order to improve service delivery to all City residents.

While City management strongly disagrees with both the criteria used in assigning risk ratings and the application of the criteria to Observation A, management nonetheless agrees to most of the recommendations, as management was largely aware of enhancement opportunities and initiated improvement efforts prior to the audit scope period.

However, Management accepts the risk related to recommendations A.1 and A.2 for the reasons detailed below.

There are fundamental differences in the Continuum of Care's and the Office of Homeless Solutions' resources, missions, reporting structures, etc., that inherently limit the degree of coordination between the organizations. However, OHS continues to work with the local Continuum of Care to ensure that strategies are closely aligned, within the guidelines of the strategies City policymakers set for OHS, as has been done since 2021.

The Office of Homeless Solutions incorporates a diverse set of data points to inform it of the success of its Four Track Strategy. This approach allows the Office of Homeless Solutions to assess programmatic impact, which is not possible when viewed only through the smaller set of contractual, quantitative data.

The Office of Homeless Solutions agrees to the remaining recommendations, the majority of which are related to Observation A and may be implemented through strengthened procedures. The Office of Homeless Solutions' standard operating procedures for contracts and compliance have been rigorously reviewed and draft enhancements began prior to the audit scope period. The Office of

Audit of Homeless Response System Strategy and Coordination

June 13, 2025

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Homeless Solutions is working diligently to finalize the draft procedures, test the procedures, formalize them, and train staff on the final revised standard operating procedures.

Please let me or my team know if you have any questions.

Service First, Now!

Sincerely,



Kimberly Bizer Tolbert

City Manager

C: Jack Ireland, Chief Financial Officer

Alina Ciocan, Assistant City Manager

Christine Crossley, Director, Office of Homeless Solutions Management

"Service First, Now!"

Connect – Collaborate – Communicate

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
High	We recommend the Director of the Office of Homeless Solutions:				
	A.1 Work with the Housing and Homelessness Solutions Committee of the City Council and Housing Forward to coordinate its strategy with the broader CoC strategy, where feasible, and reassess alignment as appropriate. This alignment should consider complementary initiatives and performance outcomes to further ensure a cohesive framework for the City's role in the homeless response system, ensure changes in this dynamic environment are addressed, and achieve a balanced approach.	Accept Risk	The Office of Homeless Solutions (OHS) receives regular guidance from the Housing and Homelessness Solutions Committee through the Four Track Strategy, quarterly Continuum of Care (CoC) systems updates, and briefing presentations and memos on all major initiatives. Accordingly, OHS has initiated efforts to better align its strategy with the CoC strategy. However, we recognize fundamental differences in the organizations' resources, missions, reporting structures, etc., that will inherently limit the degree of coordination between them. Specifically, OHS's policymakers have historically favored an approach that balances short and long-term solutions. In addition, as OHS is tasked with addressing all adult homelessness for the City of Dallas, it is not feasible for OHS to focus its resources on distinct homeless populations.	N/A	N/A
	A.2 In addition to qualitative performance outcomes, establish <i>quantitative</i> outcomes for the Four-Track Strategy where feasible to better define success and ensure downstream efforts, such as contracting and establishment of performance	Accept Risk	OHS is informed of the success of its existing Four Track Strategy by numerous contract and related performance measures. OHS utilizes the CoC's quantitative performance measures as a supplement to qualitative performance outcomes. This allows OHS to better gauge not only the specific city contribution but also the impact	N/A	N/A

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	measures, not only inform the <i>direction</i> of progress but provide clarity on the effectiveness of the City's efforts to make homelessness rare, brief, and nonrecurring.		of the contribution. Analysis of both data sets is necessary to assess programmatic impact, which is not possible when viewed only through the smaller set of contractual, quantitative data. Therefore, OHS will continue to use its current process for developing performance measures		
	A.3 Strengthen alignment of contractor objectives with its strategy by: - Ensuring the feasibility of required performance reporting in collaboration with contractors <i>before</i> contract execution to identify reporting capability concerns and mitigate the risk that OHS will not receive the necessary performance data to inform progress on strategic goals. - Establishing performance measures that evaluate effectiveness of wrap-around services provided by contractors such as Housing Forward and The	Agree	OHS continually works to strengthen the alignment of its contractor objectives to OHS's strategy. Specifically, OHS: - Has already defined and is monitoring performance measures before and during the contracting period - Is already reviewing contractors' monthly reports, including performance measures; and - Already reviews existing milestones and is working to develop a systematic process for developing qualitative milestones for inclusion in monthly reimbursement reports.	06/30/2026	12/31/2026

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	Bridge Steps as well as capacity building efforts. Considering qualitative milestones to track progress on contract objectives that are not fully realized until the end of the contract term.		In addition, OHS will: Work with contractors throughout the negotiation phase to ensure performance reporting is feasible and obligations and deliverables are clearly understood prior to contract execution; and as feasible, ensure performance measures evaluate the effectiveness of wrap-around services.		
	A.4 Update Chapter 5: <i>Project Administration</i> procedures to include specific guidelines and requirements that validate contractor performance in enough detail to provide contract specialists with examples of appropriate source documentation for validation of performance results and understanding of when additional verification is necessary.	Agree	OHS initiated revisions to Chapter 5: <i>Project Administration</i> in the middle of 2023. The final procedure will provide a consistent process for validating contractor performance to source documents.	12/31/2025	06/30/2026

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	A.5 Ensure consistency and adherence of performance monitoring and validation procedures specified in Chapter 5: <i>Project Administration</i> . This includes requirements for valid source documentation and protocols for situations in which performance data is inherently difficult to obtain or contractor is unresponsive to requests for required performance information.	Agree	OHS initiated revisions to Chapter 5: <i>Project Administration</i> in the middle of 2023. The final procedure will provide a consistent process for validating contractor performance, to source documents, and contingencies for situations where source data is inherently difficult to obtain, or a contractor is unresponsive.	12/31/2025	06/30/2026
	A.6 Require source documentation be provided to periodically validate internally generated performance reporting, such as information from dashboards or input into spreadsheets.	Agree	OHS has worked with existing contractors to obtain the feedback needed for OHS to validate internally generated reports. In addition, OHS will require contractors to provide source documents as stipulated by OHS, as necessary to validate internally generated reporting, in future contracts.	06/30/2026	12/31/2026

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	A.7 Define the requirement to document exceptions within the <i>Monthly Reimbursement Report</i> in instances when procedures to validate performance or expenses diverge from expectations set forth in the contract or OHS procedures. Ensure review and approval of the documented exceptions before payment is issued and periodically review these instances to determine opportunities to improve contractor compliance.	Agree	OHS has initiated revisions to their procedures to require documenting exceptions in the <i>Monthly Reimbursement Report</i> . Additionally, staff have been trained on the forms, requirements, and process for documenting the monthly reviews. OHS is working with contractors to resolve any exceptions. These practices will be documented in OHS's final procedures.	12/31/2025	06/30/2026
	A.8 Continue to work with Housing Forward to improve consistent availability and utilization of HMIS data for performance validation purposes, including availability of data and ad hoc reporting needed to validate performance measures and results stipulated in OHS contracts. Consider including and/or enforcing expectations for these efforts in future contracts with Housing Forward, such as the City's contract for HMIS services.	Agree	OHS will continue to work with Housing Forward's HMIS system administrator to meet all of the City's reporting needs (standard and ad hoc reporting).	03/31/2026	09/30/2026

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	A.9 Ensure that OHS allocates sufficient resources to consistently perform the required number of site visits and retain sufficient evidence to support contract specialists' review and conclusions on performance, effectiveness, and data reliability. OHS should also ensure monitoring site visit forms align with unique contracts prior to the start date and facilitate an awareness of the importance of the site visits to confirm continued data reliability.	Agree	OHS's contract and finance teams are fully staffed and are performing the required number of site visits. However, resources are allocated to OHS through the larger City budget process. While OHS agrees to implement the recommendation, it is contingent upon the allocation of sufficient budget and resources. In addition, OHS has increased staff training and will ensure that procedures and ongoing instruction continue for a consistent and effective monitoring process.	03/31/2026	09/30/2026
	A.10 Prioritize training to ensure contract specialists understand their roles and responsibilities in a complex environment, including how to appropriately validate reported performance results on a monthly basis and during site visits.	Agree	OHS continues to prioritize training, with recurring weekly, monthly, and ad hoc trainings and meetings. Training subjects include a variety of topics, such as validating monthly performance measures. Future training will fully incorporate and reinforce the ongoing revisions to OHS's procedures.	06/30/2026	12/31/2026

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	A.11 Work with Housing Forward to determine an appropriate path forward to effectively utilize the City's allocated general funds for the <i>Master Leasing Program</i> and <i>RTR Street Outreach</i> contracts. This includes scaled planning efforts between the City and Housing Forward to ensure the funds are used and reinforcement of performance reporting requirements to issue payments allowed by the contracts.	Agree	When the City Council approved the Master Leasing Program, it was intended to be used on an as-needed basis. As originally intended, the remaining funding will be used for the Pension Stabilization Fund. The Master Leasing contract expires September 30, 2025, and will not be renewed. OHS will work with Housing Forward to ensure the Street Outreach program meets its performance measures. OHS has created a bi-weekly meeting schedule with Housing Forward. These meetings will allow time to discuss issues and resolutions encountered by both organizations. Efforts will continue to align and improve the programs and performance measures to be more effective and provide supportive documentation.	12/31/2025	06/30/2026
Low	We recommend the Director of the Office of Homeless Solutions:				
	B.1 Work with Austin Street Center, Our Calling, and other area partners involved in the TIWS Program to formally define in its transportation plan when and how the use of DART bus passes is appropriate for post-inclement weather	Agree	The Temporary Inclement Weather Shelter (TIWS) program's process of exiting individuals has been honed over the years. There is a specific TIWS shutdown transportation process that is communicated through the Austin Street Center.	12/31/2025	06/30/2026

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	transportation, and ensure all partners are aware of its application. This includes considerations for connecting individuals experiencing homelessness with accessible services.		However, we recognize the process may be improved by: - Continuing to improve alignment of users' transportation needs with the City's and its partners' broader strategy; and - Continuing to improve and document the post-weather transportation process in department procedures.		
Low	We recommend the Director of the Office of Homeless Solutions:				
	R.1 Encourage Housing Forward to consider and implement the opportunities for improvement provided in Part B: Opportunities for Housing Forward and the CoC to Improve the Annual Point-In-Time Count.	Agree	OHS will ensure Housing Forward receives this audit report and will ask Housing Forward to: - Review the auditor's Opportunities for Improvement; and - Consider implementing improvements where feasible.	09/30/2025	09/30/2025