



**Department of
Social Services**

Human Resources
Administration

Department of
Homeless Services

W-2-545
Rev. 04/19

Steven Banks
Commissioner

July 17, 2020

Molly Murphy
DSS First Deputy Commissioner

Saratu Grace Gharthey
Chief Program Accountability
Officer

Mr. Joseph F. Smith
Audit Supervisor
Office of the State Comptroller
59 Maiden Lane, 21st Floor
New York, NY 10038

151 West Broadway
New York, NY 10013
212 274 5600

**Re: Corrective Action Plan Update to Final Audit Report on DHS' Homeless
Outreach Services in the New York City Subway System 2018-S-59**

Dear Mr. Smith,

Please find enclosed an updated Corrective Action Plan showing progress made to date in implementing the recommendations contained in the Final Audit Report on DHS' Homeless Outreach Services in the New York City Subway System.

We remain more committed than ever to addressing Street Homelessness, and to serving New York City's most vulnerable population in the most compassionate, efficient and effective manner possible.

We believe this is demonstrated in the improvements implemented so far and in our continuing efforts to improve our operations going forward.

Thank you again for your partnership in this effort. Should you have any questions concerning the enclosed, please contact Sonia Lamrhari, Director of the DSS Bureau of Audit Coordination at 929-221-5724.

Sincerely,

Maura Hayes-Chaffe
Assistant Deputy Commissioner, DSS Audit Services

Enclosures

**NYC DEPARTMENT OF SOCIAL SERVICES
OFFICE OF AUDIT SERVICES
CORRECTIVE ACTION PLAN**

Audit Name: NYS Comptroller Audit MTA/DHS Homeless Outreach Services in the New York City Subway System
Audit Number: 2018-S-59

Date: July 17, 2020

Auditor Recommendations	Agency Response	Responsible Unit	Agency Corrective Action	Target Date
<p>Recommendation 1:</p> <p>Ensure BRC outreach workers meet established performance measures and comply with contract requirements and the Outreach Plan, including but not limited to:</p> <p>A. Submitting Daily Reports each morning for the previous day's activity.</p>	<p>Agree</p> <p>DHS believes that enhanced performance measures must be implemented and met. The focus of the new enhanced metrics will be on client outcomes. DHS has already placed BRC on a Corrective Action Plan (CAP) focused on specific performance metrics, as well as quality assurance controls (Please see attached BRC CAP).</p> <p>A new RFP for outreach work that will strengthen oversight by outlining meaningful and measurable metrics has been issued. These new enhanced metrics will then be incorporated into the next round of contracts beginning in July 2020 when the procurement process is complete.</p> <p>DHS has also committed to updating its system of record, StreetSmart. This will allow us to capture additional data, automate some of our reporting and better monitor BRC.</p> <p>A. Agree The BRC CAP requires submissions of the Daily Reports and BRC has been supplying them since August of 2019.</p>	<p>DHS Program</p>	<p>Place BRC on a Corrective Action Plan.</p> <p>Issue new RFP.</p> <p>Complete StreetSmart Enhancements.</p> <p>A. Ensure BRC submits Daily Reports.</p> <p>B. Track Redeployment requests made to BRC and monitor BRC station visit activity regularly.</p>	<p>Completed-August 2019</p> <p>November 2019/July 2020</p> <p>7/17/20 - Update Completed/Ongoing</p> <p>June 2020</p> <p>7/17/20 Update: New target date -November 2020</p> <p>A. Completed August 2019/Ongoing</p> <p>B. December 2019</p> <p>7/17/20 - Update Completed/Ongoing</p>

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B. Making the required number of visits to each subway station.	Agree DHS agrees that BRC should comply with its station visit schedule unless otherwise redeployed by DHS and/or the MTA. Appendix B, Section 10a of our Contract states that “[t]he outreach plan shall include a strategy ensuring that all subway stations are visited by outreach workers at least once every six weeks, unless otherwise requested by [DHS] or MTA. ” (emphasis added). We are tracking requests for redeployments in order to better monitor station visits. Additionally, DHS will continue to review monthly visit logs received from BRC as outlined in the BRC CAP. When StreetSmart is enhanced, these reports will become electronic.		Enhance StreetSmart to capture station visits.	June 2020 7/17/20 – Update: New target date- November 2020
C. Bringing the required percentage of overall subway system census onto caseload.	C. Agree		C. Ensure BRC achieves the goal of placing 65% of census on caseload.	C. January 2020 7/17/20 - Update Completed December 2019/Ongoing
D. Ensuring staff are certified in CPR and Opioid Overdose Prevention.	D. Agree The BRC CAP, mentioned above, includes a requirement that BRC document that staff is certified in CPR and Opioid Overdose Prevention.		D. Ensure BRC maintains Staff Certification in CPR and Opioid Overdose Prevention.	D. Completed/Ongoing
Recommendation 2: Develop a monitoring process to determine whether BRC responds to all 311 calls within the required time frame.	Agree As part of the CAP, mentioned above, BRC is required to submit reports monthly on 311 calls which include when a 311 call was sent to BRC, when BRC responded and what the outcome was. DHS will review this report and conduct quality assurance by cross checking a portion of the calls with other documentation to ensure accuracy.	DHS Program	Monitor regular 311 Reports from BRC. Implement a quality assurance process which will cross check BRCs reports against the daily report.	Completed/Ongoing November 2019 7/17/20 - Update Completed/Ongoing

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	Under current City protocol only a portion of the 311 calls for homeless individuals in the subway actually go to BRC; the rest are routed to 911 instead.			
<p>Recommendation 3:</p> <p>Monitor the medically vulnerable homeless client list to ensure BRC workers are including sufficient client identifying information.</p>	<p>Agree</p> <p>As part of the CAP, DHS has required BRC to upload all photographs they have of individuals on the vulnerable client list to StreetSmart.</p> <p>DHS will conduct a monthly Quality Assurance Check on the Photos in StreetSmart.</p> <p>In addition, the DHS Program Analyst and/or the Program Manager will conduct at least 3 unannounced ride-a-longs per month, one of which must be on the overnight shift; and at least 3 announced ride-a-longs per month, with every other visit happening during the overnight hours. This will allow the Analyst and/or Administrator to ensure that Outreach Teams have sufficient identifying information to identify clients.</p> <p>Results from the ride-a-longs will be shared regularly with BRC and corrective actions outlined, as needed.</p>	<p>DHS Program</p>	<p>Ensure BRC uploads all photographs they have on a regular basis.</p> <p>Conduct regular Quality Assurance reviews to ensure photos are uploaded in StreetSmart.</p> <p>Conduct 6 Ride-a-longs per month.</p>	<p>Completed October 2019/Ongoing</p> <p>December 2019</p> <p>7/17/20 - Update Completed/Ongoing</p> <p>November 2019</p> <p>7/17/20 - Update Completed/Ongoing</p>

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<p>Recommendation 4:</p> <p>Enhance internal controls to ensure that BRC's reported data in CARES is accurate and complete and use the available data to make informed managerial decisions.</p>	<p>Agree</p> <p>DHS will update StreetSmart's functionality to allow for enhanced auditing of shelter placement data and will perform monthly audits comparing StreetSmart shelter placement data to CARES shelter placement data.</p> <p>DHS is performing manual audits of BRC Placements through the Diversion Program. We are planning to expand the audit to a wider variety of clients.</p>	<p>DHS Program</p>	<p>DHS will update StreetSmart to enhance auditing of shelter placement data.</p> <p>DHS will perform manual monthly audits comparing StreetSmart shelter placement data to CARES shelter placement data.</p>	<p>November 2020</p> <p>Completed October 2019/Ongoing</p>
<p>Recommendation 5:</p> <p>Monitor BRC outreach workers to ensure they are providing sufficient level of outreach services in the New York City subway system.</p>	<p>Agree</p> <p>See Response to Recommendation 1.</p> <p>DHS has hired an additional Program Manager to oversee the BRC Contract exclusively. The Program Manager will conduct twice monthly contract oversight meetings with BRC.</p> <p>DHS is requiring the Program Analyst and/or the Program Manager to conduct at least 3 unannounced ride-a-longs per month, one of which must be on the overnight shift; and at least 3 announced ride-a-longs per month, with every other visit happening on the overnight hours.</p>	<p>DHS Program</p>	<p>Conduct twice Monthly Meetings with BRC.</p> <p>Conduct regular Ride-a-Longs.</p>	<p>November 2019</p> <p>7/17/20 - Update Completed/Ongoing</p> <p>November 2019</p> <p>7/17/20 - Update Completed/Ongoing</p>

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	<p>As described above, DHS has put BRC on a Corrective Action Plan focused on specific performance measures, as well as quality assurance controls. The CAP requires BRC to:</p> <ul style="list-style-type: none"> • Place all individuals who are verified to be unsheltered in the subway on the By-Name List • Over the course of a year, place 106 clients in permanent placements, 702 clients in transitional placements and 354 clients in other placements. • Maintain 90% of clients placed in permanent housing after 12 months. <p>However, overall census reduction targets are not a meaningful tool for measuring individual Outreach provider performance because street and subway homelessness reflects larger structural economic factors beyond the control of an individual outreach provider, including the fact that rents have increased nearly 19% and incomes have increased less than 5% and there has been a loss of approximately 150,000 rent regulated apartments over the last several decades; there is currently a vacancy rate of 1.1% for apartments renting at or below \$800/month; and the impact of deinstitutionalization and criminal justice system discharges. The best tool to measure outreach provider performance is the level of outcomes achieved for clients who have been brought in off the streets and subways and then remain off the streets and subways.</p>		Monitor BRC's compliance with its August 2019 Corrective Action Plan.	Completed /Ongoing
<p>Recommendation 6:</p> <p>Submit monthly expenditure reports to the MTA within the required time frame.</p>	<p>Agree</p> <p>Two years ago, DHS and HRA Finance operations integrated and DSS was formed. As with any integration, some processes and functions were temporarily interrupted in the transition of duties among newly merged</p>	<p>DHS Program DSS Finance</p>	DHS will ensure all expenditure reports are provided to Finance monthly.	November 2019

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	<p>staffing. Consequently, a backlog occurred in the MTA invoicing process. However, as of October 30, 2019 the MTA has been invoiced for all expenses listed in HHS Accelerator up to August 2019.</p> <p>On a monthly basis, the Program Manager and/or Analyst will check to make sure all required documentation has been uploaded into Accelerator. They will then report to Finance that the documents are there.</p> <p>DSS Finance will submit monthly expenditure reports to the MTA within 30 days of the month the expenses are incurred.</p>		Finance will submit expenditure reports to the MTA monthly.	<p>Ongoing</p> <p>7/17/20 - Update Complete/Ongoing</p> <p>Expenditure reports are being submitted to DSS Finance monthly and an Invoice Tracking Process document and checklist are being finalized.</p>
<p>Recommendation 9:</p> <p>Work together to develop and establish census reduction targets.</p>	<p>Partially Agree</p> <p>DHS agrees to work together with the MTA to develop new performance measures.</p> <p>DHS disagrees that the performance metrics should be based on census reduction targets. Overall census reduction targets are not a meaningful tool for measuring individual Outreach provider performance because street and subway homelessness reflects larger structural economic factors beyond the control of an individual Outreach provider. The best tool to measure Outreach provider performance is the level of outcomes achieved for clients who have been brought in off the streets and subways and then remain off the streets and subways.</p>	DHS Program OPPM	Develop Performance Metrics.	<p>January 2020</p> <p>7/17/20 Update: Discussions with MTA ongoing.</p>