Office of Temporary and Disability Assistance
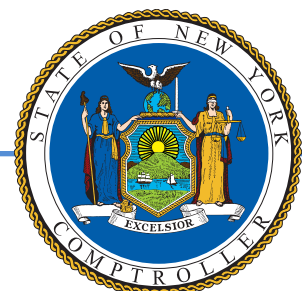
Monitoring of Homeless Data

OFFICE OF THE NEW YORK STATE COMPTROLLER
Thomas P. DiNapoli, State Comptroller

Division of State Government Accountability

Audit Highlights

Objectives

To determine if the Office of Temporary and Disability Assistance (OTDA) monitors data on the State's homeless population to better understand the nature and scope of homelessness across the State; and to determine if OTDA's programs are using all available data to best address the needs of those experiencing or at risk of homelessness. The audit covered the period from January 2018 through July 2024.

About the Program

According to the U.S. Department of Housing and Urban Development's (HUD) 2023 Annual Homelessness Assessment Report to the U.S. Congress, New York State had the second largest population of people experiencing homelessness in the United States, with 103,200 homeless individuals. Further, New York State had the largest absolute increase in homelessness between 2022 and 2023 (29,022 additional people).

OTDA supervises homeless shelters and related programs through 58 local departments of social services (Local Districts). OTDA's Division of Housing and Refugee Services administers an array of programs to address homelessness in the State, including homelessness prevention, the construction of housing, and programs that provide essential services to stabilize homeless persons' housing situations and increase their levels of self-sufficiency. OTDA has estimated annual homeless shelter costs as ranging from $2–2.2 billion for the calendar years within our audit scope.

Twice a year, Local Districts are required to submit Homeless Services Outcome Reports to OTDA. While these reports provide aggregate data to OTDA, Local Districts typically also collect and submit client-level data on the populations they serve to a computer system compliant with HUD's Homeless Management Information System (HMIS) Data Standards, which establish guidelines for the type of information organizations must collect on their homeless populations. In New York, 24 federally funded regional or local planning bodies—Continuums of Care (CoCs)—coordinate housing and services funding for homeless families and individuals. These CoCs control access to the HMIS-compliant systems but are not required to share this data with OTDA or provide open access to the Local Districts that submit this data. OTDA encourages Local Districts to establish a relationship with their CoCs to track and access data in their respective HMISs.

Key Findings

OTDA does not have access to the client-level data collected in the various HMISs—data that could be analyzed and used to help identify the root causes of homelessness, gauge progress toward achieving permanent housing, and better determine what programs are used or needed by the homeless population. OTDA asserts that it has no oversight of the HMIS data controlled by the CoCs but, seeing the value of this data, has attempted to obtain it through its data warehouse initiative. However, OTDA has acquired permission to access the data from only seven of 24 CoCs, which represent approximately 7% of the State's homeless population based on HUD's point-in-time count. Without access to this data, OTDA cannot appropriately assess the causes of homelessness throughout the State, as well as look for patterns, trends, emerging issues, increases or decreases in need for particular services, or issues of a specific Local District or region of the State—nor can OTDA evaluate Local Districts' overall performance in addressing client homelessness.

Methods of recording homeless data vary throughout the State at the Local Districts. Furthermore, analysis of all 24 CoCs found that of the 579 shelters listed by OTDA, 174 (30%) are not entering any data into an HMIS. Therefore, some of the reports received by OTDA containing the aggregate data do not include data from all shelters.

Finally, we surveyed all 58 Local Districts. Of the 54 Local Districts that responded, 36 stated that HMIS information could assist in getting clients into supportive housing/independent living, while 13 Local Districts are actively using HMIS data to help clients into housing and out of homeless shelters. Some of these Local Districts use HMIS data to understand local trends, track clients' times and locations in emergency housing, and identify gaps in services and needs of the homeless population to assist in resource management and ensure equity in the application of resources for homeless individuals at the client level. The remaining five Local Districts stated they do not utilize data from an HMIS, including one Local District that did not have access to an HMIS due to the costs associated with the system and its constrained budget.

Key Recommendations

- Take steps to obtain access to homeless client-level data for OTDA and Local Districts.
- Analyze homeless client-level data to help monitor and manage the statewide homeless shelter system, the services it provides, and the outcomes of those services.
- Pursue a comprehensive data warehouse as stated in the initial goals of the New York State Data Warehouse Environment (NYSHADE) initiative.
- Survey Local Districts to determine best practices for managing client-level data and employ these strategies statewide where appropriate.

**Office of the New York State Comptroller
Division of State Government Accountability**

May 20, 2025

Barbara C. Guinn
Commissioner
Office of Temporary and Disability Assistance
40 North Pearl Street
Albany, New York 12243

Dear Commissioner Guinn:

The Office of the State Comptroller is committed to helping State agencies, public authorities, and local government agencies manage their resources efficiently and effectively. By so doing, it provides accountability for the tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of State agencies, public authorities, and local government agencies, as well as their compliance with relevant statutes and their observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations. Audits can also identify strategies for reducing costs and strengthening controls that are intended to safeguard assets.

Following is our report of our audit of the Office of Temporary and Disability Assistance entitled *Monitoring of Homeless Data*. This audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

This audit's results and recommendations are resources for you to use in effectively managing your operations and in meeting the expectations of taxpayers. If you have any questions about this report, please feel free to contact us.

Respectfully submitted,

Division of State Government Accountability

Contents

Glossary of Terms

Term	Description	Identifier
OTDA	Office of Temporary and Disability Assistance	*Auditee*
CoC	Continuum of Care	*Key Term*
HMIS	Homeless Management Information System: any locally administered data collection system used to collect client-level data compliant with HUD's Homeless Management Information System Data Standards	*System*
HUD	U.S. Department of Housing and Urban Development	*Key Term*
Local Districts	Local departments of social services	*Key Term*
NYSHADE	New York State Data Warehouse Environment	*Key Term*
Outcome Report	Homeless Services Outcome Report	*Key Term*
Services Plan	Homeless Services Plan	*Key Term*

Background

According to the U.S. Department of Housing and Urban Development's (HUD) 2023 Annual Homelessness Assessment Report to the U.S. Congress, New York State had the second largest population of people experiencing homelessness in the United States, with 103,200 homeless individuals. Further, New York State had the largest absolute increase in homelessness between 2022 and 2023 (29,022 additional people).

The Office of Temporary and Disability Assistance's (OTDA) mission is to help vulnerable New Yorkers meet their essential needs and advance economically by providing opportunities for stable employment, housing, and nutrition. OTDA is responsible for supervising programs that provide assistance and support to eligible families and individuals. One of OTDA's main functions is supervising homeless shelters and related programs through the 58 local departments of social services (Local Districts), comprising 57 county offices and the New York City Department of Homeless Services.

OTDA's Division of Housing and Refugee Services administers an array of programs to address the problems of homelessness in the State. These services range from programs that prevent homelessness to the construction of housing for homeless individuals and families. Other OTDA programs provide essential services to homeless persons to stabilize their housing situation and increase their levels of self-sufficiency.

The following table lists HUD's point-in-time count of the number of homeless individuals for New York State, for a specific day in January, and OTDA's estimates of homeless shelter costs for those years. (Note: the point-in-time count does not fully reflect the number of individuals served during the specified calendar year.)

Reimbursement Claims Submitted to Local Districts

Calendar Year	Homeless Individuals	Shelter Costs (in billions)
2019	92,091	$2.0
2020	91,271	$2.2
2021	78,920	$2.2
2022	74,178	$2.0
2023	103,200	$2.2

Every 2 years, the Local Districts submit a Homeless Services Plan (Services Plan), which OTDA collects and reviews. As part of the Services Plan, required since 2018, Local Districts also submit Homeless Services Outcome Reports (Outcome Reports) to OTDA twice a year. The Outcome Reports, in accordance with New York Codes, Rules and Regulations Title 18, Section 304.2, contain:

- The number of sheltered and unsheltered homeless individuals and families identified in the last point-in-time count
- The number of individuals and families for whom the Local Districts provided temporary housing assistance

- The Local Districts' strategies and plans for addressing the housing and service needs of persons experiencing homelessness, and for providing or accessing each of the following:
  - Homelessness prevention services
  - Outreach
  - Assessment and coordinated entry services
  - Emergency shelter
  - Transitional housing

OTDA states that one of the main benefits of the required Services Plans is that they compel Local Districts to become actively involved with the State's 24 federally funded regional or local planning bodies—Continuums of Care (CoCs)—that coordinate housing and homeless services funding for families and individuals. HUD requires each CoC to implement and maintain a Homeless Management Information System (HMIS) that complies with its standards. In 2018, funding was made available through OTDA to support Local Districts' development of Services Plans and connectivity to HMISs. Any federally funded HMISs, the result of a congressional mandate, must comply with the data standards as established by HUD so that the type of information organizations collect on their homeless populations is consistent—information that is then made available to HUD for its federal reporting purposes. CoCs submit HMIS data to HUD but are not required to share it with OTDA or provide open access to the Local Districts that submit this data (Local Districts may not be allowed to see their own data as maintained in the HMIS system). OTDA encourages Local Districts to establish relationships with their CoCs to facilitate the tracking and access of data in the HMISs.

Audit Findings and Recommendations

OTDA does not collect or have access to client-level homeless data, which hinders its ability to better understand the nature and scope of homelessness across the State. OTDA asserts that it has no oversight of the HMIS data controlled by the CoCs but, seeing the value of this data, has attempted to obtain it. However, OTDA has acquired permission to access the data from only seven of 24 CoCs, which represent approximately 7% of the State's homeless population.

Additionally, our survey of all 24 CoCs in the State found that of the 579 shelters listed by OTDA, 174 (30%) are not entering any data into an HMIS. Therefore, some aggregate reports received by OTDA do not include data that represents all shelters. By not monitoring the State's homeless data and not using all available data, OTDA compromises its ability to analyze trends or develop strategies to address homelessness throughout the State and improve services offered through Local Districts.

Finally, our survey results from 54 Local Districts found that 36 Local Districts stated HMIS information could assist in getting clients into supportive housing/independent living while 13 Local Districts are actively using HMIS data to help clients into housing and out of homeless shelters. Some of these Local Districts use HMIS data to understand local trends, track clients' times and locations in emergency housing, and identify gaps in services and needs of the homeless population to assist in resource management and ensure equity in the application of resources for homeless individuals at the client level. The remaining five Local Districts stated they do not utilize data from an HMIS, including one Local District that did not have access to an HMIS due to the costs associated with the system and its constrained budget.

Homeless Data Systems

To support its oversight of services to the homeless, OTDA requires Local Districts to develop Services Plans and Outcome Reports. These monitoring activities exist to create accurate, fact-based data that OTDA can use to measure homeless shelter activities and their associated outcomes. However, Outcome Reports to OTDA are compiled from data entered into HMISs, but these reports provide only aggregate data to OTDA; client-level data in HMISs is not accessible to OTDA without permission and assistance from the CoCs.

OTDA officials assert that they do not have any oversight responsibilities over the HMISs and aren't required to have an HMIS or use it. They also stated they do not have access to the HMIS data at the client level, or direct access to the HMISs controlled by the CoCs, and do not compile any HMIS data. However, most client-level data comes from OTDA-certified homeless shelters monitored by Local Districts, and OTDA supervises Local Districts. Despite this, OTDA is not able to provide information such as a count of the clients at homeless shelters at a given point in time, and refers to HUD's point-in-time count for this information when requested. Further, even though OTDA receives Outcome Report aggregate data, it has not been able to show it is using even this high-level data to assess the causes of homelessness throughout the State.

Client-level data could be used to analyze and measure individual Local District performance to determine which need additional OTDA support and which could potentially share expertise with other Local Districts. Data for individual homeless clients could be analyzed for length of stays in shelter, repeated stays in shelters, and actual services received, and be used to assist with the transition to stabilized housing. Client-level data would also help OTDA to determine the number of individuals and families in homeless shelters across the State at any given moment as well as the available capacity of open beds. This data analysis would not only aid in the daily management of homeless clients and shelters, but could also be used for future planning purposes.

Given the value of client-level data for tracking and planning purposes, we surveyed Local Districts and CoCs about the different ways they collect, share, and analyze this data, and discussed OTDA's data warehouse initiative with officials. A majority of Local Districts felt that HMIS information could be helpful in getting clients into supportive housing/independent living, while some Local Districts do not use any type of HMIS or analyze any homeless data. The HMISs utilized across the State vary and can be either open or closed systems, and those who are entering the information for each Local District can also vary and can include CoCs, Local Districts, service providers, or a combination thereof.

Local Districts

Local Districts typically collect and submit client-level data on the populations they serve to a computer system compliant with the HMIS Data Standards. An HMIS may be open (allows Local Districts with an HMIS license to access their district's information) or closed (no access to data already entered into the system). The CoC, in concert with the HMIS administrator, decides whether the system is open or closed, and the Local District is not involved in this decision.

We surveyed all 58 Local Districts to determine which types of systems Local Districts are entering client-level data into, what data is recorded in the various systems, and how they use that data. For example, we found that New York City utilizes the HMIS-compliant New York City Department of Homeless Services system for all client-level tracking, outcomes, and exits. We received survey responses from 54 Local Districts, and when we requested OTDA's help with the remaining four counties, OTDA stated it would not be following up with them to participate in our survey.

We found 15 of the 54 Local Districts that responded to the survey have an open HMIS, 34 Local Districts have a closed HMIS, the nature of one Local District's system was unknown, and four Local Districts did not answer the question.

In response to our survey, 37 of the 54 Local Districts stated that they received $45,000 each in funding from OTDA in 2018 to support connectivity to an HMIS, 12 Local Districts stated they did not receive funding, two Local Districts were unsure, and three did not answer the question.

The survey showed that a majority of Local Districts (36, or 67%) felt HMIS information could assist in, or has been useful for, getting clients into supportive housing/independent living. We also found 13 Local Districts are currently utilizing HMIS data to help clients transition into housing and out of homeless shelters. Local Districts responded that they use HMIS data for:

- Understanding local trends, as well as individual client needs and outcomes
- Connecting individuals to appropriate housing services
- Developing strategies to meet homeless needs
- Sharing data with local government and Homeless Housing Task Force members
- Tracking clients' times and locations in emergency housing
- Referring individuals/families to other agencies that have funding through different programs
- Advocating for additional resources
- Evaluating program services and identifying any gaps or unmet needs of the homeless population
- Tracking vacancies at temporary housing placements
- Searching for temporary housing assistance connections in other Local Districts
- Providing an accurate count of the local homeless population and patterns of services used
- Storing documentation related to client homelessness and housing history in a centralized fashion
- Facilitating client contact with the appropriate agencies

While we did not list in this report all the uses for HMIS data cited by the Local Districts that responded to the survey, these responses indicate the client-level information would also have value to OTDA in its oversight of homeless services.

We found five Local Districts do not use any type of HMIS or analyze any homeless data. While these five Local Districts serve less than 2% of the homeless population, as determined by the point-in-time counts, it is still important to collect and analyze their data to address any issues within those Local Districts. Reasons provided for not using an HMIS included:

- Lack of access to an HMIS due to the costs associated with these systems and the negative fiscal implications of paying for licenses for a system that is closed by design.
- HMIS provider within a CoC has not been efficient or receptive to providing the Local District with the information from the system.
- Local District has access to an HMIS but does not utilize an HMIS, and it has no use to its county.

Additionally, we found nine of 54 Local Districts (17%) responded that they do not enter any data into an HMIS and that either their CoC or homeless shelter providers enter information into their HMIS instead. Further, among the 54 counties, we found various methods regarding HMIS data entry. For example:

- 17 Local Districts enter their own HMIS data
- 4 not-for-profits as a member of the CoC enter the HMIS data
- 14 Local Districts share responsibility for data entry with their CoC
- 15 Local Districts have their shelter providers as the primary entry point
- 4 Local Districts did not answer the question

Continuums of Care

We surveyed all 24 CoCs in the State to obtain a list of homeless shelters within each CoC for which there is data entered into an HMIS. We compared this list of shelters with the list of homeless shelters provided by OTDA. Of the 579 shelters listed by OTDA, 174 (30%) are not entering any data into an HMIS. Although only homeless shelters that receive HUD funding are required to enter homeless data into an HMIS, we could not factor this variable into our analysis because OTDA did not provide us with this requested information. Data that is not entered into an HMIS is less likely to be represented in the aggregate information provided to OTDA through Outcome Reports. A lack of complete data can affect OTDA's ability to make informed decisions regarding the needs of the State's homeless population.

OTDA could use its authority to ensure it is able to obtain more comprehensive homeless data from shelter providers and Local Districts. OTDA has not required Local Districts to collaborate with all CoCs so OTDA can obtain HMIS data, but asserts that it cannot obtain the data because it is controlled by the federally funded CoCs. OTDA has acquired permission to access the data from only seven of 24 CoCs, which serve approximately 7% of the State's homeless population. However, we believe OTDA should have the right and authority to access this type of data so it can analyze it to identify improvements to homeless services.

Data Warehouse Initiative

In 2015, OTDA created the New York State Data Warehouse Environment (NYSHADE) to further understand the nature and scope of homelessness across the State. Through the NYSHADE initiative, OTDA intended to phase in a data warehouse designed to centralize, organize, and analyze data from more than one source, such as multiple HMIS implementations and State mainstream systems. According to NYSHADE documents, the data warehouse could prove to be an effective tool for decision-making support and could be utilized for:

- Analyzing regional or State demographics, trends, and outcomes
- Assessing the use of mainstream services by persons experiencing homelessness

- Calculating the cost of homelessness
- Determining successful interventions to prevent and end homelessness
- Informing the development of regional or State 10-year plans to end homelessness

A NYSHADE Workgroup started meeting in March 2013 to assist the State with the implementation of the data warehouse project. The NYSHADE Workgroup membership initially included:

- Grantees under the New York State Solutions to End Homelessness Program
- CoC volunteer agencies
- HMIS administrators
- OTDA agency representatives

While the original NYSHADE Workgroup is no longer meeting, OTDA officials are still meeting internally to discuss how to continue their efforts. According to OTDA officials, OTDA met with community members through June 2016. After that, OTDA continued to work with HUD Technical Assistance and IT consultants and then the New York State Office of Information Technology Services to get the warehouse functioning. Along the way, OTDA involved HMIS administrators, as they complete the uploads and would be asked periodically to test the operations and provide feedback—and they continue to do this today.

OTDA presented at the 2024 New York Public Welfare Association's summer conference to raise awareness of this data warehouse initiative among the Local Districts. Seeing the value of analyzing HMIS data, OTDA noted it has attempted to obtain it for NYSHADE, but—as stated earlier—has acquired permission to access the data from only seven of 24 CoCs. Further, our survey of Local Districts found 31 of the 54 responded that they have not discussed the NYSHADE initiative with OTDA, 20 have discussed it, and three Local Districts did not provide a response to this question. Without all Local Districts on board with even discussing this initiative with OTDA, it will be difficult for OTDA to create a comprehensive dataset from all Local Districts.

Any progress with gaining buy-in from more of the Local Districts and CoCs would provide more data for OTDA to use in its oversight responsibilities. For example, if OTDA was able to access just NYC's data for analysis, it would provide information on about 85% of the State's homeless shelter population for decision-making purposes. Further, by including the seven CoCs that have agreed to participate in NYSHADE along with NYC, OTDA would be able to access data for analysis for approximately 92% of the State's homeless shelter population.

By not monitoring the State's homeless data, and not using all available data, OTDA compromises its ability to analyze trends or develop strategies to address the nature of homelessness throughout the State or make informed decisions about the statewide homeless shelter system. More dedicated efforts to work with Local Districts and CoCs to obtain client-level data through the HMISs and the completion

of a comprehensive data warehouse could result in more effective oversight of services provided to New York's homeless population.

Recommendations

1. Take steps to obtain access to homeless client-level data for OTDA and Local Districts.

2. Analyze homeless client-level data to help monitor and manage the statewide homeless shelter system, the services it provides, and the outcomes of those services.

3. Pursue a comprehensive data warehouse as stated in the initial goals of the NYSHADE initiative.

4. Survey Local Districts to determine best practices for managing client-level data and employ these strategies statewide where appropriate.

Audit Scope, Objectives, and Methodology

The objectives of our audit were to determine if OTDA monitors data on the State's homeless population to better understand the nature and scope of homelessness across the State; and to determine if OTDA's programs are using all available data to best address the needs of those experiencing or at risk of homelessness. The audit covered the period from January 2018 through July 2024.

To accomplish our objectives and assess related internal controls, we reviewed the New York Codes, Rules and Regulations and OTDA's Directives. We became familiar with, and assessed the adequacy of, OTDA's internal controls as they related to its performance and our audit objectives. We also interviewed HUD, OTDA, and CoC officials to obtain an understanding of the State's homeless data systems. Specifically, we reviewed the aggregate data obtained by OTDA from the HMISs, requested a list of homeless shelters entering data into HMISs from the CoCs, and conducted a survey of the Local Districts to obtain information on what data is captured in HMISs and how the Local Districts use it to better understand the nature of homelessness and address the needs of those experiencing or at risk of it.

Due to the decentralized nature of homeless shelters, there is no one definitive source of all homeless shelters in the State. Instead, we relied on information from the counties (obtained via the Office of Children and Family Services) and from the CoCs (obtained directly from each CoC) and compared that information to identify homeless shelters that were not reporting their data to an HMIS. Although the two datasets we relied on for this work are of undetermined reliability, they are the best data available to us for the purposes of this audit.

Statutory Requirements

Authority

The audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and; Article II, Section 8 of the State Finance Law.

We conducted our 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.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. These duties may be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our professional judgment, these duties do not affect our ability to conduct this independent performance audit of OTDA's monitoring of homeless data.

Reporting Requirements

A draft copy of this report was provided to OTDA officials for their review and formal comment. We considered their comments in preparing this final report, and they are attached in their entirety at the end of it. While OTDA generally agreed with our recommendations, officials took exception to some findings and statements in our report. Our State Comptroller's Comments addressing certain remarks are embedded within OTDA's response.

Within 180 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of the Office of Temporary and Disability Assistance shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons why.

KATHY HOCHUL
Governor
BARBARA C. GUINN
Commissioner
RAJNI CHAWLA
Executive Deputy Commissioner

March 28, 2025

By email to: nmorrell@osc.ny.gov

Nadine Morrell
Audit Director
Office of the State Comptroller
110 State Street
Albany, NY 12236

Re: Response to Draft Report – Monitoring Homeless
Data (2023-S-038)

Dear Nadine Morrell:

This letter responds to the Draft Report issued by the Office of the State Comptroller (OSC) on February 28, 2025, in connection with OSC's audit of the Monitoring of Homeless Data commenced in August 2023. The following information provides additional context and clarity regarding homeless data organized by section.

About the Program

The U.S. Department of Housing and Urban Development (HUD) Homeless Management Information System (HMIS) is a locally administered system used to collect client level data related to the provision of housing and services for households and individuals at risk of and experiencing homelessness.

HMIS data includes different project types including Coordinated Entry, Day Shelter, Street Outreach, Transitional Housing, Emergency Shelter, Homelessness Prevention, Permanent Housing, Rapid Re-Housing and Permanent Supportive Housing. Link to the 2024 HMIS Data Standards - https://www.govinfo.gov/content/pkg/FR-2004-07-30/pdf/04-17097.pdf.

HUD establishes guidelines for the type of data that only HUD funded organizations must collect, which does not include homeless shelters at this time.

The only project types funded through HUD's current Continuum of Care (CoC) funding competition are Permanent Supportive Housing; Rapid Rehousing; Support Services Only, typically street outreach; and certain Transitional Housing projects, which are not commonly funded. Emergency Shelter is not an eligible funding category under the current HUD CoC Funding Competition, and therefore data related to shelter stays is not required to be in the local HMIS.

State Comptroller's Comment – OTDA is confused about the general nature of the client-level data we discuss throughout this report and limits its responses to the HUD-funded HMIS client-level data. Our recommendations focus on obtaining access to *any* homeless client-level data for OTDA and Local Districts and analyzing this data to help monitor and manage the statewide homeless shelter system, the services it provides, and the outcomes of those services.

Key Findings

The assertion that access to client-level HMIS data will help identify the root cause of homelessness is an oversimplification of the homelessness crisis. Studies show that the root causes of homelessness include poverty, lack of affordable housing, mental illness, substance use, trauma, and domestic violence. None of these contributing factors are captured by the demographic data contained in the HMIS system. For example, while disabling conditions are a universal data element in the HMIS system, disabling conditions are self-reported and do not themselves explain the full scope of the reason a person may be experiencing homelessness.

State Comptroller's Comment – We agree there is nothing simple about the homelessness crisis, and we do not tout access to client-level HMIS data as the solution in and of itself. However, OTDA is misguided in its response. By not taking steps to obtain access and analyzing client-level data, OTDA is missing out on an opportunity to more completely understand the problems, develop effective solutions, and drive meaningful change.

Since the drafting of the report, OTDA has acquired permission to access full HMIS data from an additional eight CoCs in addition to the seven mentioned in the report, which encompasses 32 counties.

Further, because shelters are not required to enter data into HMIS, it is misleading to suggest that a definitive percentage of the State's shelter population is captured by New York State Homeless Assistance Datawarehouse Environment (NYSHADE) at this time. For these same reasons, even if all CoCs agree to share HMIS data with NYSHADE, there would likely still be gaps between the shelter population captured by NYSHADE and the actual population currently being served.

State Comptroller's Comment – Our report does not suggest that a definitive percentage of the State's shelter population is captured by NYSHADE at this time. As noted on page 12 of our report, if OTDA was able to access and analyze New York City's data, it would provide valuable information on approximately 85% of the State's homeless population for decision-making purposes. Further, by including the seven CoCs that have already agreed to participate in NYSHADE, along with New York City, OTDA would be able to access and analyze data for approximately 92% of the State's homeless shelter population.

Background

The "Reimbursement to Local Districts" chart illustrating HUD's Point-In-Time (PIT) count of homeless individuals and shelter costs is misleading. The PIT count includes individuals who are unsheltered, persons in domestic violence shelters, youth shelters, warming stations, transitional housing, or other temporary settings. These programs are not included in the

referenced shelter costs. Furthermore, according to the 2023 Annual Homeless Assessment Report to Congress, NYC's PIT increase was largely attributed to asylum seekers. Homeless shelter reimbursements do not account for households seeking asylum placements in temporary housing. Additionally, the chart is incorrectly titled as "State Reimbursements to Local Districts," when it should be more accurately described as the gross dollar amount of claims submitted by districts, which are not all eligible for reimbursement. Furthermore, comparing the gross dollar amount of claims submitted by districts over the course of a year to the number of individuals served at a given point in time on a single night in January of each year is additionally misleading.

State Comptroller's Comment – The Reimbursement to Local Districts chart is not misleading and is based on OTDA's responses to our requests for information. Our report specifically states the number of homeless individuals listed in the chart is based on HUD's point-in-time count and notes "the point-in-time count does not fully reflect the number of individuals served during the specified calendar year." On several occasions during this audit as well as prior audits, upon our request for the number of homeless clients OTDA serves and the costs incurred while serving this population, OTDA officials could not provide us with the information and instead directed us to the HUD data. We revised the chart title in our report for clarity.

The report states that in 2018 HUD Federal funding was made available to assist districts in connecting to HMIS. This is incorrect. This effort was 100% State funded in an effort to assist with developing the homeless services plan and/or assist with meeting the outcome reporting requirements, which could include HMIS connectivity.

State Comptroller's Comment – When we met with OTDA officials to discuss this issue—which was on several occasions—each time officials stated this was federally funded. OTDA now states that State funds were used to acquire these systems. If State funds were used to acquire these systems, OTDA should have ensured that a condition of accepting and using those funds required that OTDA have access to the data collected by those systems—regardless of who maintains or enters the data.

Though CoCs submit their HMIS data to HUD, every project that serves people currently experiencing homelessness within the CoC may not be HUD funded or reflected in HMIS as a result.

State Comptroller's Comment – The information collected can be from any system that collects data, plus any additional information gathered in those systems related to the homeless population and the services provided by Local Districts—it does not necessarily need to be from the HMIS system that reports data to HUD.

Audit Findings and Recommendations

It should be noted that access to HMIS in NYC differs considerably from access in Rest of State (ROS), including Westchester and Long Island. For ROS projects such as Homelessness Prevention, Permanent Housing, Rapid Re-Housing, and Permanent Supportive Housing licensing fees are paid to an HMIS administrator to be a part of one singular HMIS implementation. For example, CARES of NY is the largest HMIS administrator in the State covering 12 CoCs. They have one HMIS implementation and organizations, including districts,

can pay a modest licensing fee for their users allowing access to the system. In NYC there is not an HMIS administrator that covers all projects, rather DHS has a data warehouse to accept uploads from all projects. Each organization is required to purchase their own implementation which could cost thousands of dollars to be able to upload to the DHS data warehouse. Therefore, the cost for shelters in NYC to be able to access HMIS is substantially more costly than licensing in ROS counties.

Homeless Data Systems

OSC's assertion that the client level data would help OTDA to quickly determine the available capacity of open beds and movement of individuals are inaccurate. Emergency shelters are not funded by HUD and therefore not a required entity to enter data into HMIS. Additionally, HMIS entries are not typically done in real time and cannot provide capacity information on a day-to-day basis.

State Comptroller's Comment – This is a misunderstanding by OTDA of the various client-level data systems, defined as HMISs, throughout this report. Determining the total population served and bed capacity is an example of information that could be maintained within those systems. As stated previously, OTDA does not currently have any system to provide homeless population figures. We revised our report based on OTDA's response.

Local Districts

The description of an open versus closed system is not correct. A closed system only allows users in each project such as a permanent housing program to access the full data contained in their own project. An open system allows for users to see limited basic demographic information such as name and date of birth from other projects in the same CoC. Restricting access to sensitive data based on job functions/role is essential for maintaining data integrity and security. For these reasons, by design, only HMIS administrators have access to see full client-level data in projects across a CoC.

State Comptroller's Comment – The description of an open versus closed system was provided to us by OTDA officials. OTDA officials did not indicate the description was inaccurate in their response to our preliminary findings or during subsequent meetings. Regardless, if the Local District is not the HMIS administrator, they would not have access to the client-level data collected and entered into HMIS to aid them in identifying the trends in homelessness within their district and determining the accuracy of the data.

The report states (pg. 9) that OSC received responses from 54 local districts and requested OTDA's assistance contacting the remaining districts. We dispute the statement that OTDA declined OSC's request to follow-up with districts to participate in their survey. As a matter of fact, OTDA provided guidance and assistance to any district that reached out to OTDA with questions regarding the survey.

State Comptroller's Comment – OTDA is mistaken. In an email dated June 6, 2024, OTDA stated, "OTDA will not be following up with the four districts/counties that did not reply to your survey."

Every district in New York State had access to the $45,000 in start-up homeless services plan funding. The question– "Did your county receive $45,000 in funding from OTDA in 2018 to support connectivity to HMIS?" is an inaccurate question as the funding was provided for the start-up of homeless plans and not the connectivity to HMIS. Although only 37 affirmatively reported they received this funding, funding was allocated to all districts.

State Comptroller's Comment – OTDA is mistaken. Local Commissioners Memorandum (18-LCM-21), dated November 20, 2018, clearly states, "This Local Commissioners Memorandum (LCM) provides notification to social service districts (districts) of an allocation for $45,000 per district to support connectivity to their local Homeless Management Information System (HMIS) and other administrative actions related to Homeless Services Plans."

The assertion that a district may be responsible for specific percentage of the State's homeless population based on the PIT numbers is also misleading. PIT numbers include people experiencing homelessness in a multitude of settings, some of which the district may have no oversight or control over, including Domestic Violence shelters, encampments, youth shelters, transitional housing programs or privately funded uncertified shelters which do not accept Public Assistance.

State Comptroller's Comment – Our report clearly states that "the point-in-time count does not fully reflect the number of individuals served during the specified calendar year." On several occasions during this audit as well as prior audits, upon our request for the number of homeless clients OTDA serves and the costs incurred while serving this population, OTDA officials could not provide us with the information and instead directed us to the HUD data.

Data entry cannot be delegated to the CoC from the district. The CoC is a membership organization that includes the local district(s) who more directly serve New Yorkers experiencing homelessness – and as a result are the main member organization in a position to enter data into HMIS. If the district does not enter their own data, they are likely contracting with a local non-profit to enter that data.

State Comptroller's Comment – We revised our report based on OTDA's response.

Continuums of Care

The draft findings state that "although only homeless shelters that received HUD funding are required to enter homeless data into HMIS, we could not factor this variable into our analysis because OTDA did not provide us with this requested information." OTDA staff explained that there are no homeless shelters that receive funding directly from HUD, as such, homeless shelters are not required to enter data into HMIS. However, some shelters voluntarily chose to enter their data into HMIS.

State Comptroller's Comment – We revised our report to clarify that homeless shelters do not enter data into HMISs. However, in its response, OTDA said that State funding was provided to support connectivity to HMISs. Accordingly, OTDA could require those Local Districts using State funding to support connectivity to provide OTDA access to the data collected.

The assertion that OTDA can use its authority to mandate HMIS participation from certified shelters fails to acknowledge the costs of HMIS access, the limitations of CoC authority over projects that do not receive HUD funding, and the limitations of OTDA authority to require sharing of data with and by the CoC to which OTDA is not directly a party.

State Comptroller's Comment – We agree there are costs associated with HMIS access as well as the limitations of CoC and OTDA authority. However, OTDA is confused about the general nature of the client-level data we discuss throughout this report and limits its responses to the HUD-funded HMIS client-level data. Our focus is on obtaining access to *any* homeless client-level data for OTDA and Local Districts and analyzing this data to help monitor and manage the statewide homeless shelter system, the services it provides, and the outcomes of those services.

OTDA's Bureau of Housing and Support Services receives information on trends and develops strategies to address homelessness through extensive work with districts and providers and analysis of the Homeless Services Plans (HSP). HSPs contain county-wide data, trends and an inventory of the resources available that are aimed at preventing and ending homelessness. Districts are also encouraged to share the difficulties facing their communities as they attempt to address the homelessness crisis.

State Comptroller's Comment – In its response, OTDA officials assert they delegate the responsibility of identifying trends to the Local Districts. However, by delegating the responsibility of identifying trends to the Local Districts, any trends identified are related only to the Local District performing the analysis. By not analyzing data on a statewide basis, OTDA is missing out on an opportunity to more completely understand the problems, develop effective solutions, and drive meaningful change.

<u>**OTDA's responses to OSC Recommendations**</u>

1. Take steps to obtain access to homeless client-level data for OTDA and Local Districts.

OTDA Response: OTDA has and will continue to pursue the goals of the NYSHADE initiative to assist districts to identify trends in homelessness in their communities.

2. Analyze homeless client-level data to help monitor and manage the statewide homeless shelter system, the services it provides, and the outcomes of those services.

OTDA Response: For reasons explained within, HMIS is not designed to manage the day-to-day operations of the Statewide homeless shelter system. OTDA does not currently collect client-level data for individuals in the homeless shelter system.

State Comptroller's Comment – OTDA's response is concentrating on the official HMIS database—not the local systems that can contain this information. By not collecting or having access to and analyzing client-level data, OTDA is missing out on an opportunity to more completely understand the problems, develop effective solutions, and drive meaningful change.

3. Pursue a comprehensive data warehouse as stated in the initial goals of the NYSHADE initiative.
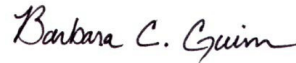
OTDA Response: OTDA has and will continue to pursue the goals of the NYSHADE initiative. Since the drafting of the report OTDA has acquired permission to access full HMIS data from eight additional CoCs bringing the total to fifteen CoCs encompassing 32 counties.

4. Survey Local Districts to determine best practices for managing client-level data and employ these strategies statewide where applicable.

OTDA Response: OTDA will continue to work with Local Districts to determine and share best practices for analyzing trends, including HMIS participation where appropriate.

If you have questions or comments about our response to the Report, please contact Thomas Cooper at (518) 473-6035.

Sincerely,

Barbara C. Guinn

Barbara C. Guinn
Commissioner

cc: Rajni Chawla
    Richard Umholtz

Contributors to Report

Executive Team

Andrea C. Miller - *Executive Deputy Comptroller*
Tina Kim - *Deputy Comptroller*
Stephen C. Lynch - *Assistant Comptroller*

Audit Team

Nadine Morrell, CISM, CIA - *Audit Director*
Robert Mainello, CPA - *Audit Manager*
Brandon Ogden - *Audit Manager*
Brian O'Connor - *Examiner-in-Charge*
Andrew Davis - *Senior Examiner*
Lisa Tarullo - *Senior Examiner*
Andrea Majot - *Senior Editor*
Rachel Moore - *Senior Editor*