



# Supportive Housing Services: Shared oversight reduces transparency and accountability

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January 2024  
A Report by the Office of the Auditor

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## MEMORANDUM

January 10, 2024

To: Lynn Peterson, Council President  
Ashton Simpson, Councilor, District 1  
Christine Lewis, Councilor, District 2  
Gerritt Rosenthal, Councilor, District 3  
Juan Carlos Gonzalez, Councilor, District 4  
Mary Nolan, Councilor, District 5  
Duncan Hwang, Councilor, District 6

From: Brian Evans, Metro Auditor

**Re: Audit of Supportive Housing Services Program**

This report covers the second audit of the Supportive Housing Services Program. The purpose was to follow up on audit recommendations made in May 2021, and assess the governance structure and performance processes.

Metro made progress on the three previous recommendations. One was fully implemented, and two were in process. Although progress was made, the audit identified opportunities to strengthen oversight by reducing duplication in some areas and clearly assigning responsibility in others.

The audit also identified weaknesses in the performance measurement system. Each part of the system needs to be aligned toward the same goals. Reliable data is needed to assess progress towards those goals. Decision-makers and the public need to be able to understand what the data means. Reliable data is important not only for current efforts, but to inform future actions. The region is likely to invest over \$2.5 billion through the program. This level of funding provides a valuable learning opportunity to plan for the future.

We have discussed our findings and recommendations with Marissa Madrigal, COO; Holly Calhoun, Deputy COO; Patricia Rojas, Housing Director; Liam Frost, Housing Deputy Director; Yesinia Delgado, Supportive Housing Services Program Manager; and Rachael Lembo, Finance Manager, Finance and Regulatory Services. I would like to acknowledge and thank all the people who assisted us in completing this audit.

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## Summary

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In May 2020 voters in the Metro region approved a ballot measure to establish a region-wide supportive housing services program. The measure was intended to generate about \$250 million annually to address the needs of people experiencing, or at risk of experiencing, homelessness.

This is the second performance audit of Supportive Housing Services (SHS) implementation by the Office of the Metro Auditor. It follows up on recommendations made in 2021 and provides updated analysis of the oversight structure and performance measurement system.

Metro made progress on the three recommendations made in the May 2021 audit. One was fully implemented, and two were in process. Additional work on the first in process recommendation will be critical to create a performance measurement system that provides reliable and relevant information about program outcomes. Further oversight of administrative spending by the Regional Oversight Committee would help fully implement the second in process recommendation.

The audit identified opportunities to strengthen oversight by reducing duplication in some areas and clearly assigning responsibility in others. Regional oversight and accountability are a shared responsibility. When multiple parties have broad responsibility over a program there is a risk that some responsibilities could be duplicated or overlooked. Specifying how each role relates to the others, and what timelines are needed to ensure timely alignment would enhance program oversight.

Although the performance management system improved since 2021, gaps remain. We found variation in definitions, reports, and calculations that made it difficult to understand how the program had progressed. Ensuring reports are accurate and complete is an important element of accountability to the public. In addition, Metro will use monthly and quarterly data to monitor compliance with any corrective action plan, so data reliability is important to ensure agreements are followed.

Reliable data is important not only for current efforts, but to inform future actions. The Tri-County Planning Body is tasked with creating a regional plan and fostering coordination between the counties. Starting to think about the long-term plan now will be critical to ensure that the region has a data-driven strategy to inform priorities when SHS taxes sunset at the end of 2030.

The audit includes 18 recommendations. Seven were designed to ensure timely and ongoing program oversight. Six focus on improving the reliability and consistency of program performance data and reporting. The other five recommendations were made to identify programs that provide efficient, effective, and equitable services to inform long-term planning.

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# Background

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In May 2020 voters in the Metro region approved a ballot measure to establish a region-wide supportive housing services program. The measure was intended to generate about \$250 million annually to address the needs of people experiencing, or at risk of experiencing, homelessness. Program documents stated that 5,000 people experiencing long-term homelessness would be served, and 10,000 people experiencing short-term homelessness would be served.

Seventy five percent of funds were expected to be spent on services for people experiencing long-term homelessness who also had one or more disabling conditions (Population A). The other 25% was intended for individuals experiencing, or at risk of experiencing, homelessness (Population B).

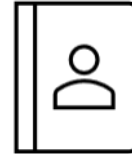
## **Exhibit 1 Supportive Housing Services were prioritized for two groups**

### **Population A (75% of funding)**



- Extremely low-income; AND
- Have one or more disabling conditions; AND
- Are experiencing or at imminent risk of experiencing long-term or frequent episodes of homelessness

### **Population B (25% of funding)**



- Individuals experiencing homelessness or have a substantial risk of experiencing homelessness

*Source: Metro Supportive Housing Services Workplan.*

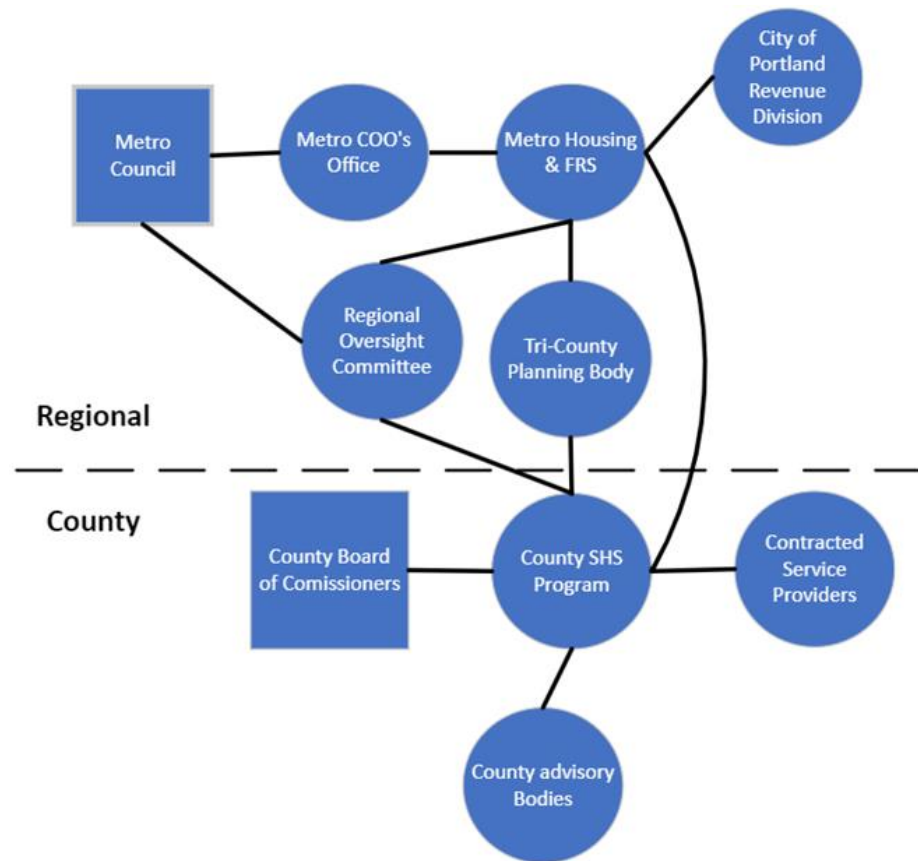
This is the second performance audit of Supportive Housing Services (SHS) by the Office of the Metro Auditor. The purpose of the first audit in 2021 was to take an early look at performance measures for the SHS program. It included three recommendations to improve performance management, regional coordination, and financial oversight. This report includes information about the status of previous audit recommendations, and new analysis to address the program's needs after two years of development.

Metro distributes SHS funds to Clackamas, Multnomah, and Washington counties to provide services. Each county's SHS programs are overseen by the elected Boards of County Commissioners and their respective advisory bodies.

Metro provides oversight of the regional program and supports the Regional Oversight Committee and Tri-County Planning Body. The Regional Oversight Committee (ROC) reviews adherence to the SHS guiding

principles and counties' implementation plans. The Tri-County Planning Body (TCPB) facilitates cooperation between counties through a series of regional strategies. The ROC is made of up of volunteers. TCPB members are appointed by each county and includes a mix of elected officials, public sector employees, and some volunteers. The City of Portland collects SHS taxes on behalf of Metro.

**Exhibit 2 SHS governance includes multiple layers of oversight, implementation, and accountability**



*Sources: Auditor's Office visualization of SHS governance structure based on program documents.*

Within Metro, the Housing Department (Metro Housing), the Chief Operating Officer's Office (COO), and Finance and Regulatory Services (FRS), are involved in the SHS program. Metro Housing conducts most of Metro's administrative responsibilities, while FRS provides financial review, oversees tax collection, and disburses revenue to counties. The COO's Office is involved in resolving disputes between Metro and its partners.

SHS was initially managed by Metro's planning and development department. In fall 2022, Metro Housing became a separate department. It manages implementation of SHS and a separate program funding affordable housing construction.

SHS expenditures totaled about \$272 million (adjusted for inflation) in the first three years of the program. County spending accounted for 76% of spending. About 10% went to the City of Portland for tax collection. The other 14% was spent on Metro’s personnel, materials and services, and debit service to implement the regional program. Metro’s staffing for the program averaged 5.4 FTE during the first two years. Budgeted FTE increased to 16 in FY 2022-23. An additional 18.7 FTE were approved in the FY 2023-24 budget, which may bring the total to about 35 FTE.

**Exhibit 3 The majority of SHS funds were distributed to the three counties**

Type	FY 2020-21	FY 2021-22	FY 2022-23	Total
Personnel	\$337,951	\$692,540	\$1,038,071	\$2,068,562
Materials & Services	\$3,313,902	\$732,689	\$3,470,276	\$7,516,867
Debit Service	\$4,254,325	\$12,809,991	\$12,034,845	\$29,099,161
Tax Collection	\$3,466,304	\$15,130,235	\$8,252,522	\$26,849,060
Counties	\$1,114,990	\$59,525,526	\$146,015,458	\$206,655,974
Total	\$12,487,472	\$88,890,980	\$170,811,173	\$272,189,625

*Source: Auditor’s Office analysis of PeopleSoft data. Adjusted for inflation.*

Revenue for the SHS program is generated from a marginal tax on personal income (1%) and business profits (1%) above certain thresholds. Metro reserves 5% of funds, after tax collection costs, for administrative expenses. Clackamas (21.33%), Multnomah (45.33%), and Washington (33.33%) counties receive the remaining revenue.

Counties are expected to use their funding to cover administrative costs for their programs. Metro’s agreements with each partner do not limit their spending but recommend counties not exceed 10% for the long-term rental assistance voucher programs and 5% of all other programs. Based on current estimates, about 90% of SHS funds will go to the counties.

The SHS tax began in January 2021 and is set to expire after ten years unless renewed by voters. Each county’s Local Implementation Plan guides how their funding will be used. The plans were reviewed by the ROC and approved by Metro Council in the spring of 2021. The first funds were distributed to counties in July 2021, but the intergovernmental agreements between each county and Metro were not signed until February 2022. Each

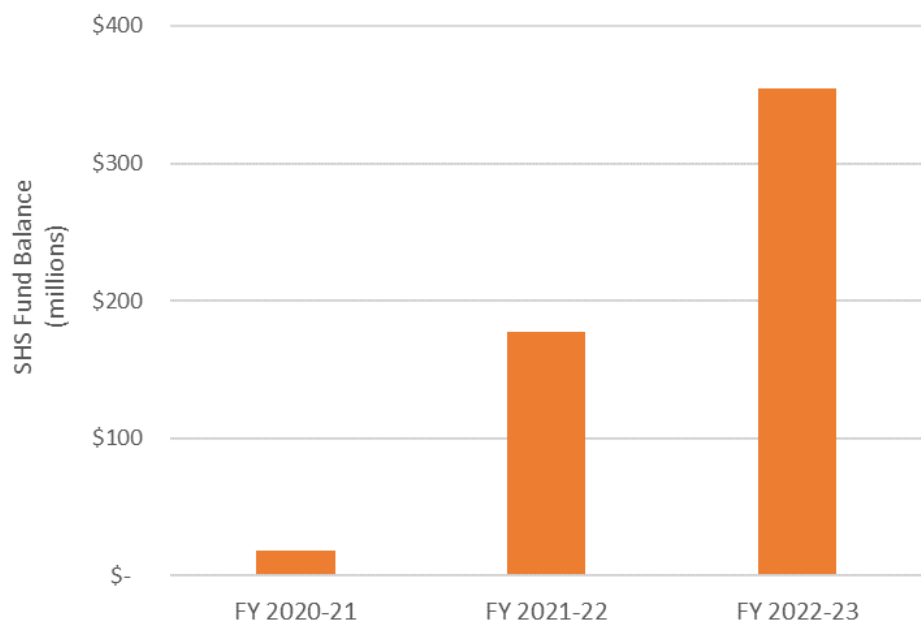
year, counties are required to present a new budget and workplan to Metro and the ROC.

There was uneven preparedness to use the funding among the three counties. The FY 2021-22 annual report stated that the program required a ramp up in capacity for all counties. Clackamas and Washington counties began the program with limited supportive housing programs compared to Multnomah County. Counties and their service providers had workforce shortages and other challenges that limited their ability to make use of available funds.

About \$592 million in SHS taxes was collected during the first three fiscal years. First year collections were relatively low. The tax generated significantly more revenue in its second (\$243 million) and third fiscal years (\$348 million).

Spending has not matched revenue in the first three fiscal years. In the first year, spending was more than available tax revenue. Metro issued bonds to cover the gap. Spending grew during the second (\$89 million) and third years (\$171 million), but revenue exceeded expenditures. As a result, only 40% of the tax revenue collected in the first three fiscal years was spent, which has resulted in a large fund balance (\$354 million). Metro predicts that it will take three to four years for county spending to match available revenues. During the audit, there were discussions within each county, and between Metro and the counties, about how to use the unspent revenue.

#### **Exhibit 4 Revenue has exceeded expenditures, resulting in a growing fund balance**



*Source: Auditor's Office analysis of data for the Supportive Housing Services Fund in Metro's Annual Consolidated Financial Reports.*



SHS also faced other challenges. Some taxpayers were issued fines in 2023 for not paying the tax but were unaware of it. The fines were ultimately waived.

In May 2023, Metro began a process to implement a corrective action plan with Multnomah County. The plan was intended to address underspending by Multnomah County as FY 2022-23 came to an end. Metro and Multnomah County reached agreement on the corrective action plan in August 2023, which will require more frequent and detailed reporting requirements moving forward.

County programs provide a variety of supportive housing services. In SHS reports, the types of services appear to be based on the names created by the U.S. Department of Housing and Urban Development (HUD). For example, HUD’s *permanent supportive housing* is a type of service funded by SHS, but it is not the only one. Rapid re-housing, eviction prevention, and shelter beds are also funded by SHS.

**Exhibit 5 Services focus on different needs**

Service Type	Description
Permanent Supportive Housing	Wrap-around housing services; includes housing, long-term rent assistance, and long-term social and health services
Rapid Re-Housing	Short-term services for people who have recently fallen into homelessness to help them find and maintain stable housing.
Eviction Prevention	Short-term services to help people who are already housed avoid homelessness. Includes services like rent assistance and legal support.
Shelter Beds	Emergency shelter capacity that was either created or sustained using SHS funding.

*Source: Auditor’s Office summary of Supportive Housing Services program areas reported by counties.*

Each county is required to report the number of people served by each program. The data they use for reporting comes primarily from the Homeless Management Information System (HMIS), which is the same database used to meet HUD reporting requirements. Metro created reporting templates in partnership with each county to monitor progress. These reports include participant information on race and ethnicity, disability status, and gender identity. Reports also include the number of people served in each of the two SHS groups, Population A and B.

**Exhibit 6 People served by service type (FY 2021-22 & FY 2022-23)**

Service Type	Clackamas	Multnomah	Washington	Total
Permanent Supportive Housing	794	1,753	1,314	3,861
Rapid Re-Housing	46	1,340	383	1,769
Eviction Prevention	643	14,536	1,203	16,382
Shelter Beds	240	772	497	1,509

Source: Auditor's Office summary of data reported in "Regional Annual Report July 1, 2021 to June 30, 2022" and county fourth quarter reports for fiscal year 2022-2023.

**Exhibit 7 People served by population type (FY 2022-23\*)**

Priority	Clackamas	Multnomah	Washington	Total
Population A	1,099	934	809	2,842
Population B	209	5,647	1,656	7,512

Source: Auditor's Office summary of data reported in county fourth quarter reports for fiscal year 2022-2023.

\*Data about who was served in each of the priority populations was not included in the "Regional Annual Report July 1, 2021 to June 30, 2022".

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## Results

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The Supportive Housing Services ballot measure requires coordination among a variety of oversight groups to ensure it delivers on its promises. After two years of implementation, now is an opportune time to assess what has been accomplished and what more is needed. This audit follows up on recommendations made at the beginning of the program's implementation and provides updated analysis of the oversight structure and performance measurement system.

Since our first audit of the program in May 2021, Metro made progress on the three audit recommendations. One was fully implemented, and two were in process. Additional work on the first in process recommendation will be critical to create a performance measurement system that provides reliable and relevant information about program outcomes. Further oversight of administrative spending by the Regional Oversight Committee would help fully implement the second in process recommendation.

This audit identified opportunities to strengthen oversight by reducing duplication in some areas and clearly assigning responsibility in others. Because there are many parties involved it is important that oversight responsibilities are clear and well defined. Shared responsibilities can result in lack of accountability and transparency to the public, and the individuals who are intended to be helped by the program. Gaps or duplication in oversight can result in too much attention being paid to some issues, and not enough attention being paid to others.

This audit also identified weaknesses in the performance measurement system related to data reliability, goal clarity, and communication. Each part of the system needs to be aligned toward the same goals. Reliable data is needed to assess progress towards those goals. Decision-makers and the public need to be able to understand what the data means.

Reliable data is important not only for current efforts, but to inform future actions. The region is likely to invest over \$2.5 billion through the program. This level of funding provides a valuable learning opportunity to plan for the future. The Tri-County Planning Body is tasked with creating a regional plan and fostering coordination between the counties. Starting to think about the long-term plan now will be critical to ensure the region has a data-driven strategy to inform priorities when the funding sunsets at the end of 2030.

### Metro made progress on previous recommendations

The 2021 audit found opportunities to improve oversight and accountability for SHS. At that time, there were uncertainties about how many people would need services, the types of services that would be provided, and the amount of revenue that would be available. These unknowns, combined with weaknesses in performance measures, led us to recommend an incremental approach to developing goals and targets. We also highlighted a potential misalignment around Metro's commitment to minimizing administrative costs. The 2021 audit included three recommendations.

**Exhibit 8 Progress was made on audit recommendations made in 2021**

Recommendation	Status
<p>To be responsive to uncertainty about the measure’s inputs and to ensure accountability for funding levels, Metro should:</p> <ol style="list-style-type: none"> <li>1. Set annual performance goals and targets for the outputs and outcomes expected to be achieved by each county during the first two years of the program</li> </ol>	<p><b>Implemented</b></p>
<p>To strengthen oversight and accountability for the program, Metro should:</p> <ol style="list-style-type: none"> <li>2. Convene the tri-county planning group as soon as possible to:               <ol style="list-style-type: none"> <li>a. Develop regional strategies</li> <li>b. Continue development of the performance measurement system including performance goals and targets for each county and service type</li> <li>c. Create regional data collection and evaluation plan that takes into account the ease of collection, alignment with adopted regional outcomes and costs</li> </ol> </li> </ol>	<p><b>In Process</b></p> <p>(Implemented) (In Process)</p> <p>(In Process)</p>
<p>To ensure compliance with the program’s requirements, the COO and the department should:</p> <ol style="list-style-type: none"> <li>3. Seek guidance from Metro Council and the Oversight Committee about how to balance the policy goal to maximize funding for direct services with administrative funding to dedicated to Metro, tax collection, local implementation partners, and the regional tri-county planning fund</li> </ol>	<p><b>In Process</b></p>

*Source: Auditor’s Office summary of the status of recommendations made in 2021 audit report.*

The 2021 recommendation to set annual performance goals and targets for the first two years of the program was implemented. Annual goals for each county were established. Progress on first year goals was included in Metro’s FY 2021-22 annual report.

In 2021, we understood that the Tri-County Planning Body (TCPB) would be responsible for the regional performance measurement system, but Metro Housing ended up taking on this responsibility. According to Metro, the TCPB will only be responsible for measuring progress on regional strategies, not the overall SHS program. This change, combined with the convening of the TCPB and their development of a set of regional strategies, effectively implemented the first part of the second recommendation (2a).

The other parts of recommendation two were in process. The ballot measure did not include expected outcomes or performance measures. An advisory group identified performance measures after the measure was approved by voters, but those measures had weaknesses. Some areas identified in the ballot measure, such as expanded case management, were not covered by the performance measures. The measures did not identify data sources, which made it difficult to evaluate progress.

We recommended that the performance measurement system continue to be developed incrementally, with performance goals and targets set for each service type (2b). Metro created a quarterly reporting template that specifies service areas such as permanent supportive housing, rapid rehousing, and eviction prevention. The annual county budgeting and workplan process included setting goals around these service areas. Although progress was made, there are still gaps in the performance management system. They are discussed in detail later in this report.

**Exhibit 9 Some county goals were met during FY 2021-22^**

	Program Category	Goal	Actual Outcome
<b>Clackamas</b>	Supportive housing services	200 households	125 households
	Long-term rent assistance	250 units	202 units
	Short-term rent assistance	130 households	0 households*
	Eviction prevention	110 households	0 households*
	Housing placement	200 households	125 households
	Emergency housing	65 units	100 units
	Outreach	500 households	0 households*
<b>Multnomah</b>	Housing placements	1,300 people	1,129 people
	Preventions	600+ people	9,156 people
	Shelter/temporary housing	Up to 400 new beds (all funding sources)	150 SHS-funded (407 system-wide)
	Outreach/engagement	1,500 people	2,640 people
	Employment	100 people engaged in low-barrier employment	359 people received employment training

<b>Washington</b>	Supportive housing	500 placements	305 placements
	Housing stability	500 households	0 households*
	Year-round shelter	100 new beds	102 new beds
	Winter shelter	150 new beds	212 new beds
	Culturally specific provider partnerships	Network of culturally specific providers established	4 culturally specific providers under contract

*Source: Auditor summary of information included in "Regional Annual Report July 1, 2021 to June 30, 2022".*

*^The annual report for FY 2022-23 was not finalized when this audit was complete.*

*\*Metro reported that these programs would begin in FY 2022-23.*

The 2021 audit identified challenges with regional data collection and evaluation. We recommended a regional data collection and evaluation plan to address challenges around data privacy, cost and ease of collection, and alignment with program outcomes (2c). Metro Housing was in the process of implementing this recommendation during this audit. We were informed of a draft scope of work for a consultant that was expected to begin work in fall 2023 with evaluation expected to begin in spring 2024. Depending on the duration of the evaluation, results may not be available until year five of the 10-year tax.

The originating legislation for SHS stated that administrative costs should be minimized. As such, we recommended program staff seek guidance on balancing funding for direct services with administrative costs (3). This recommendation was in process. Metro Council provided input on Metro’s administrative costs and tax collection agreement. However, additional oversight of county administrative costs and implementation of the tri-county planning fund is still needed.

Based on the allocations identified in intergovernmental agreements, we estimated Metro and county administrative costs were between \$12 and \$58 million total for FY 2021-22 and FY 2022-23. This does not include potential administrative costs for service providers, or the cost of tax collection. There are no guidelines for service provider administrative costs, and they have not been a part of any financial reports to date. The Metro SHS workplan states that the ROC will review service provider administrative costs annually and recommend changes in allocations to Metro Council. That responsibility does not appear in any other program documents. The analysis did not appear in the FY 2021-22 annual report.

We found the ROC considered administrative spending on a limited basis. The ROC often lacked the information necessary to make judgements and, when presented with this information, seemed unaware of their responsibility to do so. This issue is discussed in more detail later in this report.

## There were gaps and duplication in program oversight

We identified opportunities to strengthen SHS oversight. Regional oversight and accountability are a shared responsibility between Metro Council, the Regional Oversight Committee (ROC), Tri-County Planning Body (TCPB), and Metro Housing. When multiple parties have broad responsibility over a program there is a risk that some responsibilities could be duplicated or overlooked. Specifying how each role relates to the others, and what timelines are needed to ensure timely alignment would enhance program oversight.

### Exhibit 10 Shared responsibilities increase the need for coordination

Party	Potentially Overlapping Oversight Responsibilities
Metro Council	<ul style="list-style-type: none"> <li>Monitoring of program outcomes, with guidance from the Regional Oversight Committee and Tri-County Advisory Body</li> </ul>
Tri-County Planning Body	<ul style="list-style-type: none"> <li>Provide guidance to implement SHS values at the regional level</li> <li>Develop a Regional Plan for approval by the Regional Oversight Committee that incorporates regional strategies, metrics, and goals as identified in the Metro SHS Workplan and counties' Local Implementation Plans</li> </ul>
Regional Oversight Committee	<ul style="list-style-type: none"> <li>Review annual reports for consistency with approved Local Implementation Plans</li> <li>Monitor financial aspects of program administration, including program expenditures</li> <li>Provide annual reports assessing performance, challenges, and outcomes to Metro Council and Clackamas, Multnomah and Washington County Boards of Commissioners</li> </ul>
Metro COO and Staff	<ul style="list-style-type: none"> <li>Ensure program implementation upholds promises to voters</li> <li>Develop and coordinate systems to provide robust oversight and accountability to ensure transparency of public funds</li> </ul>

*Source: Auditor's Office summary of SHS documents.*

Metro Council's oversight role is to monitor program outcomes. However, establishing timely processes to fulfill that role is complicated by the structure of the program. Three other bodies oversee performance of county programs. The ROC advises Council on county performance and alignment with implementation plans. The TCPB is tasked with developing a regional plan and strategies. Metro Housing and the COO administer the regional program and work with county partners to resolve disputes. Each of these groups has operated on different timelines.

Council did not appear to have a public process to track program results in a timely manner. The first Regional Annual Report was presented to Council

in June 2023, which was almost a full year after the data summarized in the report. As a result, if they needed to issue guidance or make changes based on FY 2021-22 performance, they would not have had a mechanism to do so until after FY 2022-23 ended.

Given the complexity of oversight, it will be important for Council to establish processes to ensure accountability to the public while also respecting the other oversight processes that are in place. Considering the high-profile, public nature of the program and the significant public investment, Council should consider more regular reviews of program progress. Quarterly reports, annual reports, and annual workplan reviews are all opportunities for Metro Housing to give more timely updates to Council between annual reports. Intergovernmental agreements give Metro the authority to monitor up to 25% of counties' SHS program activities per year with reasonable written notice. This provision could also be a useful tool for Council but will require more planning to determine the purpose and timing of such monitoring.

Another challenge for effective oversight is a potential gap between responsibility and authority. For example, the ROC is responsible for reviewing the financial aspects of program administration and can make recommendations. Though the ROC is responsible for monitoring program administration, they do not have the authority to implement corrective action plans, nor are they specifically tasked with recommending corrective action when necessary. Authority to implement corrective actions is based on the intergovernmental agreements between Metro and the counties.

Metro initiated a corrective action plan in May 2023 when it identified a material deviation in spending for Multnomah County. The definition of *material deviation* in IGAs may not be specific enough to ensure consistency. The definition says:

“a material deficiency arises where the Program Funds spent in a given fiscal year cannot be reconciled...to the degree that no reasonable person would conclude that Partner’s spending was guided by or in conformance with the applicable spend-down plan or CAP [corrective action plan].”

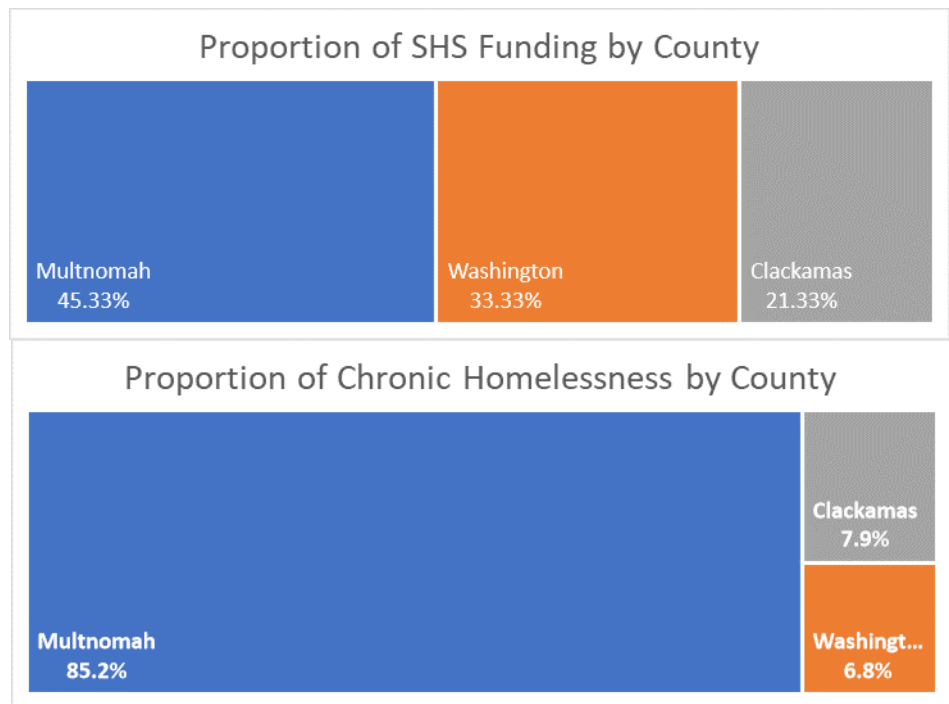
Establishing consistent expectations of counties before issues arise may reduce disputes. Preparing for these types of issues ahead of time is critical to ensure each county is being held to the same standard.

Similarly, intergovernmental agreements specify that Metro and the counties will establish a process to review the allocation of revenue between counties after FY 2022-23. We did not find an indication that this process was established. It is not clear if this process is meant to involve Metro Council, TCPB, ROC, or Metro staff.



This is important because the initial allocation was based on an estimate of the proportion of taxes that would be generated in each county, not the level of need in each county. For example, Multnomah County receives 45.33% of SHS funds, but had 85.2% of the individuals experiencing chronic homelessness in the region according to the 2022 Point in Time Count. Clackamas had 7.9% of the regional total of those experiencing chronic homelessness but receives 21.33% of SHS funds. Washington County had 6.8 % and receives 33.33% of SHS funding.

**Exhibit 11 Funding allocations for each county are not aligned with their share of people experiencing chronic homelessness in the region**



Source: Auditor's Office analysis of SHS Workplan, IGAs and 2022 Point In Time Count.

Although the ballot measure stated that the funds would be allocated based on estimated revenue collection, IGA provisions state that a process to reevaluate initial allocations should be established but does not state that it needs to be based on revenue collection. Metro and counties may be able to reevaluate if the allocations should be based on where revenue is generated, where need is highest, or where resources are lowest.

During the first two years of the program, Clackamas and Washington counties received significantly more funding for each person experiencing homelessness compared to Multnomah County. The vastly different levels of funding per person makes it difficult to compare county performance. The long-term ability of Multnomah County to address homelessness may be hindered by this allocation, but they may not need as much SHS funding if they receive more funding than the other two counties from other sources.

## Opportunities exist to refine ROC's focus and membership

We identified opportunities for the ROC to strengthen its oversight roles by reviewing administration expenses, refocusing on some charter responsibilities, and diversifying the types of experiences members bring to the committee.

The ROC did not appear to evaluate administrative spending. The measure states that they are to consider whether administrative costs for Metro and the counties should be adjusted at least annually. As part of that role, they are required to recommend ways for Metro to limit tax collection and administrative costs. Our review found that the ROC may not be aware of this role and may lack the data to do it.

A review of ROC meetings and minutes found limited discussions of administrative spending. In one case, potential issues with administrative spending were identified by staff but not discussed by the committee. Metro Housing's review of first year annual reports found that recommended administrative spending amount was exceeded by Clackamas and Multnomah counties. Washington County did not report on administrative spending in year one. Though Metro provided this information to the ROC there is no record of the committee discussing it.

The responsibility to review Metro, county, and service provider administrative spending was stated in the ballot measure, the SHS workplan, and intergovernmental agreements. The requirement to review administrative expenses and make recommendations to Metro Council does not appear in the ROC charter. As a result, the ROC may not be aware of their responsibility.

Even if it were known, the ROC may not be able to fulfill this responsibility for county administrative expenses due to lack of information. Financial reports have two line items for county administrative spending; administrative costs and administrative costs for Regional Long-Term Rental Assistance. This may not be enough detail to make recommendations. A breakout of spending on staffing versus materials and contracted services, could be useful. Additionally, annual reports will need to include information on service provider administrative spending to meet the SHS workplan requirement for the ROC to review it.

More detail was available for Metro's administrative expenses. Metro provided information on tax collection costs and Metro's administrative spending to the ROC. Quarterly reports on Metro spending appear to have sufficient detail to enable discussion of spending.

Tax collection and administrative costs may total \$569 million or more over the life of the program. Adjusting tax collection costs would require a new IGA between Metro and City of Portland, so about \$140 million of these costs may be difficult to change. Even so, between \$200 million and \$429 million in potential administration costs requires oversight. Ensuring there is

a consistent process to review it could be an important factor in fostering public trust and keeping the promise to maximize the amount of funds that go towards direct services.

We found the ROC spent more time on some of its responsibilities than others in 2023. For example, the following three topics were discussed frequently:

- improving communication about the value and success of the program to the public
- shortening the length of time for service providers to get paid by counties
- increasing wages and ensuring sufficient workforce for service providers

Time spent on these topics might limit discussions of core oversight roles by using meeting time and staff resources on topics addressed by other groups. For example, half the time on the July agenda was reserved for a discussion of shortening the time it takes for providers to receive payment from counties. Though the ROC has a responsibility to identify issues that may hinder program progress, discussing these issues in depth may duplicate the work of other groups. Identifying issues and then handing them off to other bodies to act could be more efficient.

In contrast, reviewing the spending allocation between the two priority groups (Population A and B) is an example of an ROC responsibility that has not occurred. The SHS measure requires that at least 75% of program funds should be used for Population A. None of the counties reported Population A and B spending in their FY 2021-22 annual report. Staff reported to the ROC that this information was not available, which suggested the ROC did not have data to provide oversight of one of the key program requirements.

Stronger oversight is needed to ensure counties are making progress. Metro's assumption is that Population A and B funding distribution may not strictly adhere to the requirement on an annual basis but will do so by the end of the 10-year program. Waiting until the end of the program increases the risk that those in greatest need of services may not receive them. An annual increase in proportional spending on Population A could provide an indication that the regional program, and its component parts, are on track to achieve the spending requirement.

## Adding other perspectives could improve oversight

To ensure the ROC is providing independent oversight of the program, it would be valuable for Metro to assess adding members or areas of expertise such as public finance. The SHS measure identified a list of criteria for ROC membership to ensure it includes diverse perspectives. Current members bring leadership experience from fields identified in the measure's criteria, such as supportive housing, social justice, and healthcare. However, around 70% of ROC members stated close interests in the supportive housing field, including being employed by, or serving on boards of entities that receive SHS program funding.

## There are gaps in performance measures and reporting

Recommended practices for oversight bodies state that they should offer constructive criticism to program management and utilize critical thinking, problem solving and professional skepticism. The Federal Strategic Plan to End Homelessness recommends that all sectors should be involved with efforts to reduce homelessness.

The SHS performance management system improved since the 2021 audit. Ongoing performance reporting now includes input and output measures, but gaps remain. As the program develops, it will be important to continue to strengthen data reliability and ensure there are ways to evaluate progress.

The current system lacks the ability to measure the quality of services and efficient use of funds. Some metrics that could address these gaps were identified in Metro’s SHS workplan. Now that reporting templates have been established, metrics required in the SHS workplan are expected to appear in annual reports. Metro should consider adding these metrics to quarterly reporting templates to improve the ROC’s ability to provide timely and consistent oversight.

Current reports include data about the number of people served, but not the quality of services. This could incentivize programs to provide low-quality service in high numbers. Though not an SHS-funded example, Sandy Studios shows the potential risk. Sandy Studios was a supportive housing complex for veterans that closed in 2021 due to unsafe living conditions.

Oversight bodies and the public could benefit from being able to compare regional capacity to regional needs. Including data on regional capacity to deliver housing and services alongside the most recent counts of the number of people experiencing homelessness would help stakeholders understand the size of the program’s impact.

Another way to improve understanding among stakeholders and set realistic expectations would be to add data about retention and returns to homelessness. Some individuals may exit permanent supportive housing and return to homelessness, increasing the total number of people requiring services. Those individuals may also re-enter permanent supportive housing later. This data is already being collected by counties, so adding it to reports may not be resource intensive. The net number of people exiting homelessness—the total number of people who achieved stable housing subtracting the returns to homelessness—is a key metric. Reporting and relying only on the number of people served does not capture the actual reduction in overall homelessness.

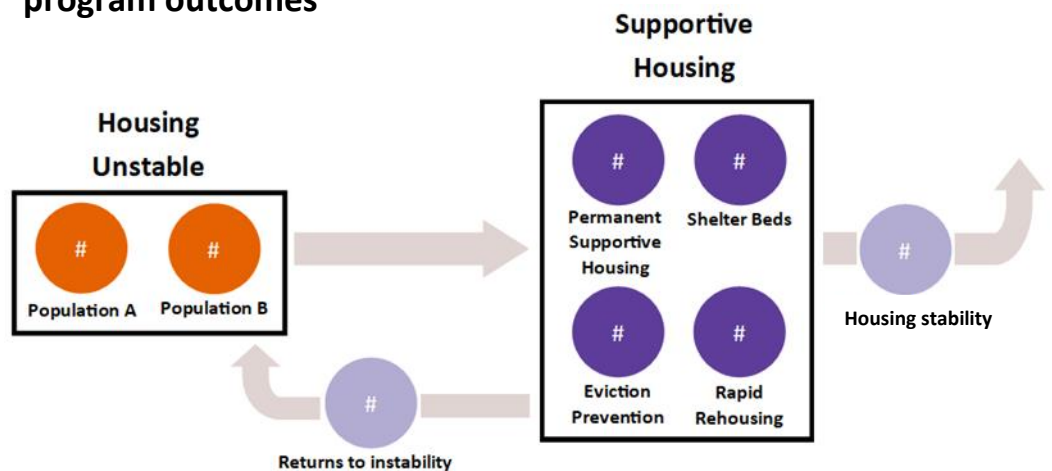
Some communities use the Built for Zero approach to assess progress. This approach uses *functional zero* to measure whether a community has measurably solved homelessness. For chronically homeless individuals, functional zero is defined as the greater of two numbers:

- either fewer than three people, or
- 0.1% of the total number of individuals experiencing chronic homelessness in the most recent point-in-time count.

To achieve functional zero, the Built for Zero framework recommends using a *by-name list* which is a list of every person experiencing homelessness. Implementing a by-name list could help the counties measure how the region is progressing towards functional zero.

Other tools can support transparent communication and tracking of results. The 2021 audit discussed the importance of logic models to help the public, stakeholders, and decision makers understand how each part of the program is connected to deliver on desired outcomes. Exhibit 12 contains a model that shows how SHS population goals and service types align. Adding actual numbers for each of the circles could help the program put performance data in context to show the overall impact of SHS investments.

**Exhibit 12 Logic models can help visualize how each data point impacts program outcomes**



*Source: Auditor’s Office model of how current data could be combined to show program outcomes.*

**Inconsistent reporting makes progress difficult to understand**

Reporting inconsistencies made it difficult to understand how the program has progressed over the first two fiscal years. We found variation in definitions, reports, and calculations that reduce clarity. Increasing consistency would help the public and oversight bodies evaluate progress.

The program committed to provide services to 5,000 people experiencing prolonged homelessness with complex disabilities, and 10,000 households experiencing short-term homelessness or at risk of homelessness. It seems likely that the two goals were created to set expectations about the number of people or households that should be served in Populations A and B. However, it is unclear whether the goals align fully with those populations.

The descriptions of the 5,000 and 10,000 goals are not the same in key program documents. Inconsistent definitions create a barrier to understanding program goals and appear to shift from year to year without explanation. The inconsistencies are not minor word variations, they have a direct effect on what is expected and what data points are appropriate to evaluate progress.

There were multiple inconsistencies for each goal. For example, three different sources provide three different definitions for the second goal. One says *as many as 10,000*, one says *at least 10,000*, and one says *an additional 10,000*. Each phrasing suggests a different number of people will be served.

There are other variations that shift expectations. The SHS Workplan and website list 5,000 *people*, but the budget says *households*. Individuals and households are tracked separately in homeless information systems. Metro’s budget lists specific service types to evaluate the 10,000 goal, while the other two sources refer to the populations being served and don’t specify the type of services they receive.

### Exhibit 13 Inconsistent language reduces clarity about SHS goals

Source	Goal
Metro SHS Workplan	Provide services for as many as 5,000 <i>people</i> experiencing prolonged homelessness with complex disabilities, and <i>as many as 10,000</i> households experiencing short-term homelessness or at risk of homelessness.
Metro SHS Website	Connect at least 5,000 <i>people</i> experiencing chronic homelessness to permanent supportive housing. Stabilize <i>at least 10,000</i> households at risk of or experiencing homelessness in permanent housing.
FY 2023-24 Housing Department Budget	House at least 5,000 <i>households</i> experiencing homelessness into permanent supportive housing and serve <i>an additional 10,000</i> households with eviction prevention and rapid rehousing services over ten years.

*Source: Auditor’s Office analysis of SHS Workplan, SHS website, and Metro’s Adopted FY 2023-24 Budget*

Another significant inconsistency is how service types align with the 5,000 and 10,000 goals, and Population A and B funding goal. We were unable to find documentation to explain how each of the service types, such as permanent supportive housing and eviction prevention, were used to report on SHS goals. For example, if eviction prevention services are part of the 10,000 goal, then this goal was already met before end of FY 2022-23.

Another example was related to reporting about *housing placements* on Metro’s website. Housing placements were a combination of at least two service types: permanent supportive housing and rapid re-housing services. Data about housing placements was used in the FY 2021-22 annual report and Metro website, but not in most other reports or presentations to the ROC. The calculation of this metric appears to vary between the regional report and the Metro website, as well as between FY 2021-22 and FY 2022-23 on the SHS website. In FY 2021-22, housing placements only includes permanent supportive housing, but FY 2022-23 included both permanent supportive housing and rapid re-housing. The use of the term *housing*

*placements* in the regional report only appears to refer to permanent supportive housing.

Combining these two distinct service types into a single metric creates unnecessary confusion, particularly because these two program types may serve different populations. It may also make it more difficult to compare progress against goals set in LIPs, which track supportive housing and rapid rehousing separately. Progress reports should define how measures were calculated and how they relate to program goals. Creating new categories reduces the public's ability to understand how county performance aligns with annual goals.

Metro's Population A and B definitions present a similar challenge. Both definitions include people who are currently experiencing homelessness and people who are at risk of experiencing homelessness. The inclusion of these distinct groups reduced the usefulness of these metrics, as each group is likely to need different types of services. For example, people experiencing homelessness could not receive eviction prevention assistance because this would require that they have housing. As such, program goals could technically be achieved without serving anyone who is actually experiencing homelessness.

Another inconsistency is that reports for the FY 2021-22 and FY 2022-23 are not comparable. Financial, quarterly, and annual reporting templates were not established in FY 2021-22. Counties used templates for FY 2022-23, which increased consistency between counties but not with the data reported for year one. Updated information for first-year outcomes has been provided in the annual regional report, but some gaps remain. Financial data and information on contracted service providers were not comparable between counties for FY 2021-22 even after the update.

We also found misalignment in the structure of outcomes and financial reporting. This created a barrier to understanding the costs of each service type. For example, financial reports group rapid re-housing and eviction prevention spending into one line item called short-term housing assistance. This makes it difficult to see how much was spent on each service type. To help oversight bodies and the public evaluate efficiency and effectiveness, financial report categories should be aligned with the number of people, or households, who received each type of service.

**Consistent data definitions are needed**

County-reported SHS performance data appears to come from the Homeless Management Information System (HMIS), a data system required by the U.S. Department of Housing and Urban Development (HUD). Metro assumes that county data adheres to HUD's data standards, but there does not appear to be a process to verify this.

Even if each county is following HUD data standards consistently, SHS definitions do not always align with these standards. For example, the HUD definition of permanent supportive housing only includes people who are experiencing homelessness. Metro's definition of Population A also includes

people at risk of experiencing homelessness. The SHS template definition of permanent supportive housing includes the term “service-enriched housing”, which does not appear in HUD standards. Metro’s reporting template also identifies transitional recovery housing as a potential permanent supportive housing program, which is not classified as permanent housing in HUD standards. The inconsistency between SHS definitions and HUD standards could result in inconsistent reporting among counties, or for the same county between HUD and SHS reports.

These risks are why we recommended creating a regional data collection and evaluation plan in the 2021 audit (recommendation 2c). Because some SHS definitions vary from HUD definitions, it is critical to reach agreement about how to address data in the regional program. To align with SHS definitions, new data collection methods and considerable investment are likely needed. If HUD’s definitions are sufficient, then additional spending for data collection may not be needed, but the SHS definitions should be updated to align with the data that is being used to evaluate progress.

## Procedures for data reliability were underdeveloped

Metro’s procedures to ensure data reliability were underdeveloped. The data in quarterly reports appeared to be regularly incomplete or inconsistent. These reports are available to the public and are a main method for counties to communicate their progress throughout the year. In addition, Metro will use monthly and quarterly data to monitor compliance with any corrective action plan, so data reliability is critically important to ensure the agreement is followed. Ensuring that quarterly reports are accurate and complete is an important element of accountability.

Metro Housing stated that data completeness increases throughout the year. While staff may expect updates to previous quarterly report totals, those expectations may not be known to the public. Ensuring reporting templates clearly indicate that totals are subject to change, and establishing acceptable thresholds for those changes, will be an important part of maintaining public trust.

In FY 2022-23, as of the third quarter, 21 of the 30 population and service data points we analyzed contained inconsistencies between the individual quarters and the year-to-date total. These differences occurred in all three counties but their size varied. The average difference was 8% for service data and population data, but as high 53% for certain categories. For services, supportive housing had the biggest difference, around 13%. Multnomah and Washington county data had the greatest difference between quarterly and year-to-date data for both service and population data.

By the end of the fourth quarter counties had reconciled the inconsistencies in the data. This suggested that they had methods in place to provide consistent totals by year-end. Multnomah County’s data did not match, but they provided an explanation that data was not captured for some people who received services. Reporting got more accurate by year end, but it



indicated that quarterly data may be less reliable. Without consistent and complete data in quarterly reports, the program appeared to lack a mechanism to monitor progress throughout the program year.

Stronger quality control processes are needed to ensure quarterly reports are as accurate and consistent as possible. We did not find documentation that Metro Housing completed a thorough check of data in quarterly reports. Staff stated that they reviewed reports after receiving them to make sure they were complete with no obvious data errors, and sometimes asked the counties clarifying questions. However, the number of inconsistencies in the first three quarters indicated that these processes were underdeveloped.

The three counties do not appear to be using the same methodology to calculate who was served in each of the priority population groups. For example, Clackamas County reported serving significantly higher proportions of Population A than Multnomah and Washington counties. This suggested that the counties may be using different assumptions in how they make categorizations with population data. Metro allows counties to use their own methodologies for Population A and B reporting. Metro's population definitions are distinct but could be interpreted similarly. Population A includes an *imminent* risk of homelessness while Population B includes a *substantial* risk. An important role for Metro is to ensure that the counties use similar enough data reporting methods that the data can be aggregated to report the overall impacts to the public.

Another way county data may not be comparable is how non-SHS funded services were reported. In the FY 2021-22 annual report Multnomah County included services provided by non-SHS funds. Washington and Clackamas counties did not. This could overstate the impacts of SHS or set unrealistic expectations for future performance. It could also be misleading to the public about the impacts and efficiency of SHS funds.

Data from ECONorthwest, an independent research firm, and county budgets show that spending for county homeless services came from other sources including county, state, and federal funds. For example, in FY 2021-22, ECONorthwest estimated that SHS funding accounted for between 13% and 54% of county spending related to homelessness. Multnomah County's FY 2023-24 budget showed it expects about 45% to come from SHS. SHS reports noted that Multnomah County utilized non-Metro funds to help exceed their eviction prevention goal in FY 2021-22 and FY 2022-23. If services provided by non-SHS funds continue to be in reports, it would overstate SHS program performance.

## Long-term planning is needed

Looking ahead, serving people experiencing, or at risk of experiencing homelessness, will require long-term planning. Successfully meeting program goals could result in the need to provide ongoing support for at least 5,000 individuals. Some portion of individuals may require SHS services for the rest of their lives. The Tri-County Planning Body (TCPB) is tasked with regional planning and identifying the most effective strategies to meet the region's needs. They will need to understand the number of people who will require ongoing funding to inform planning for current, and future, programs.

Metro anticipates that as the program matures, and permanent supportive housing participation goes up, other service types will likely need to be reduced to match available funds. Growth in the number of permanent supportive housing participants may limit the ability to serve populations that benefit from the other service types offered by the program. Metro plans to begin work on a long-term financial plan in FY 2023-24.

One consideration is how many people will need long-term or permanent housing support versus the number who may move toward partial or full financial independence. Counties' data shows that people experiencing homelessness reported substance use disorders, serious mental illness, or other conditions, which may limit their ability to move towards independence. Understanding the costs to provide services for individuals with these needs will be critical to design an effective response.

One risk is that if the funding is not renewed, as many as 5,000 people receiving assistance could suddenly lose their housing or services. Contingency planning may help mitigate future challenges if funds are insufficient or if voters do not renew the measure. In that case, other funds may be needed to maintain service levels.

Permanent supportive housing is likely to be the costliest type of service to provide per person because of the ongoing commitment to support people with disabling conditions. For permanent supportive housing, reports indicated that Multnomah County spent about \$24,000 per person while Clackamas and Washington counties spent about \$6,000 per person. Counties reported people were enrolled in permanent supportive housing throughout the program year. Calculating the annual costs of service per person and why Multnomah County's per person spending was about four times that of the other counties could be valuable information.

## Reaffirm commitment to proven solutions

One of the SHS guiding principles is funding proven solutions. Research can help identify the programs that are best able to meet the needs of unhoused people. This type of information will likely be relevant to the TCPB as they work with the counties to develop implementation plans for regional strategies.

Research shows the challenge of providing emergency rental assistance to the people with the greatest need. A controlled study conducted in Chicago

of over 4,000 people showed that participants who sought short-term rental assistance sometimes became homeless whether or not funding for services was available. The study suggested that short-term rental assistance may not necessarily target people who would become homeless without the assistance and could be a challenging method of providing the right type of assistance at the right time.

The findings of the study contrast with Metro's reporting which suggests that eviction prevention is synonymous with preventing homelessness. These types of studies indicate SHS reports should be careful about the language used to describe program outcomes. Setting realistic expectations will be critical for increasing trust with the public. If the region decides to seek voter approval to continue the SHS program beyond 2030, it will need to provide an accurate assessment of what has been accomplished. Learning from the current program provides an invaluable opportunity to increase trust with the public.

Another example comes from research on shelters. It suggests that certain types of shelters are less effective. The SHS program funds shelters and tracks shelter beds created and sustained as a program metric but does not delineate between the different types of shelters. Additional detail about the outcomes of different shelter types would provide valuable data to inform SHS strategies.

Shelter arrangements that offer individual sleeping arrangements (non-congregate shelters), have multiple documented benefits including higher acceptance than arrangements where people sleep together (congregate shelters). Some counties' work plans mention the goal of utilizing both congregate and non-congregate shelters. Data collection on non-congregate versus congregate shelter would provide a valuable indicator of shelter quality. This could help ensure SHS funds are used for the shelters with the highest acceptance rates.

Research states that shelters can help people stabilize and move toward housing. However, individuals who have behavioral health needs, or trauma, can find a shelter environment to be intimidating, overwhelming, and unsafe. For these individuals, living on the streets may feel like a better option than navigating the complex structure of shelter environments.

Research shows emergency shelters have an important role to play as a short-term safety net for households who have lost their housing. However, the Oregon Statewide Shelter Study found that most people experiencing homelessness reported not using shelter for various reasons. The barriers they cited were:

- Personal safety concerns
- Personal privacy concerns
- Restrictive check in and check out times
- Overcrowding
- Unsanitary conditions

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## Recommendations

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To ensure timely and ongoing program oversight, the COO's Office and Metro Housing should:

1. Set up a process to ensure each oversight body gets timely information about each other's work.
2. Increase the frequency of program updates to Metro Council.
3. Get input from Metro Council, Tri-County Planning Body, and Regional Oversight Committee about the variety of experience needed to provide independent oversight among the members of the Regional Oversight Committee.
4. Document criteria and processes for monitoring up to 25% of county program activities.
5. Document criteria and processes for implementing corrective action plans.
6. Ensure the Regional Oversight Committee can fulfill its responsibilities by:
  - a. Providing a full list of responsibilities assigned to it.
  - b. Providing sufficient data to evaluate administrative spending and make recommendations.
  - c. Providing sufficient data to evaluate spending on Populations A and B.
  - d. Including data and recommendations about administrative spending and spending on Populations A and B in the annual report to Council.
7. Establish an annual process for Metro Council, Tri-County Planning Body, and Regional Oversight Committee to review the funding allocations for each county and adjust if needed.

To improve the reliability and consistency of program performance data, Metro Housing should:

8. Clarify the goals related to serving 5,000 people and 10,000 households.
9. Define which service types are used to report on progress towards the 5,000 and 10,000 goals.
10. Develop a performance measure to evaluate the quality of services provided.
11. Use existing data to provide more context for county and regional performance by adding the following to quarterly and annual reports:
  - a. Retention and returns to homelessness compared to the number of people served
  - b. The capacity of permanent supportive housing compared to the overall need
12. Create a process to check the accuracy of county quarterly and annual reports and require counties to identify if they have revised data reported previously.
13. Update reporting templates to:
  - a. Add data about the percentage of the counties' total spending that comes from SHS.
  - b. Add line items for spending on each service type provided.

To identify programs that provide efficient, effective, and equitable services to inform long-term planning, the Tri-County Planning Body should:

14. Research relevant studies of the program impacts on SHS' target populations.
15. Research best practices for communicating program results to increase understanding among decision-makers and the public.
16. Advise Boards of County Commissioners, Metro Council, and Metro Housing periodically on the results of the research.
17. Advise the Regional Oversight Committee and Metro Housing about best practices for communicating program results to ensure understanding.
18. Use research, program data, and financial projections to inform strategies for the regional program.

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## Scope and methodology

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The purpose of this audit was to follow up on previous audit recommendations and assess the governance structure and performance processes. The objectives for this audit were:

1. Determine if there are gaps or redundancies in program governance.
2. Determine if processes are sufficient to ensure accurate reporting on program performance.
3. Conclude on status of 2021 audit recommendations.

To familiarize ourselves with the program we interviewed Metro staff, management, and committee members of the Regional Oversight Committee and Tri-County Planning Body. We also reviewed Metro legislation, quarterly and annual reports, Local Implementation Plans, Intergovernmental Agreements, committee charters, and the Supportive Housing Services workplan. We attended oversight committee and planning body meetings.

To review program governance, we documented the responsibilities for each party in the SHS governance framework by reviewing authorizing documents. The primary documents used were the ballot measure and the intergovernmental agreements, workplans, and charters. We identified potential gaps and overlaps by comparing those responsibilities to progress reports and meeting minutes.

Our evaluation of data reliability and reporting included an analysis of the information provided in annual and quarterly reports, as well as the information required in reporting templates. We analyzed reports for accuracy and consistency. We compared templates and reports to reporting requirements established in authorizing documents.

Financial analysis included data from PeopleSoft, Metro's financial reporting software, as well as financial information provided publicly in oversight meetings and quarterly and annual reports. We analyzed financial data for internal consistency and consistency with reporting requirements.

This audit was included in the FY 2022-23 audit schedule. 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.

# Management response



## Memo

Date: January 5, 2024  
To: Brian Evans, Metro Auditor  
From: Marissa Madrigal, Chief Operating Officer  
Patricia Rojas, Housing Director  
Subject: Management Response to Supportive Housing Services Audit

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Auditor Evans:

Thank you for the opportunity to respond to the 2023 Supportive Housing Services Audit. We have been anticipating your feedback and recommendations as we look to improve implementation of this important program. Your review prompts a reflection not just on the recommended improvements you have suggested, but about whether the fundamental structure and governance of this three-year-old, nationally unique regional homeless services program matches expectations of how this program should function.

While this new program requires honest and earnest review, it is also important to acknowledge its incredible successes. Counties and providers have served many thousands of people with Metro SHS funds: 5,776 people have been placed in housing, while more than 18,149 individuals have avoided homelessness all together through eviction preventions - actions which have no doubt saved lives. But when tens of millions of dollars sit unspent across the region while thousands of people are still sleeping outside, we know there should be an unflinching re-examination of the fundamental assumptions underlying the program and its governance structures, such as the intergovernmental agreement between Metro and the Counties.

As the largest per capita investment in the nation dedicated to addressing homelessness, the SHS Program is uncharted territory. Governing a groundbreaking program like this in good faith with the public requires persistent critique of the challenges it faces, and an unwavering commitment toward improving the overall system for better outcomes. To that end, management believes there are opportunities to improve and clarify Metro's role in overseeing this vital regional program. Some of these opportunities have already been in progress – for example, the Metro Council added capacity in quality oversight and data collection for the housing program in the 2023-24 budget. Your recommendations have helped shape and refine our concepts for additional opportunities.

Many of the challenges the SHS program faces can be traced back to the design of its well-intentioned, but sprawling and complex governance structure. The values at the center of its design are strong – center stakeholders with lived experience in decision-making, listen to the service providers on the ground, engage in collaboration and allow for local governments to make decisions tailored to their communities. While we remain fully committed to these values, the structures designed to facilitate the application of those values have come with unintended consequences. The program currently navigates long, complex pathways to planning and goal setting; ambiguous and overlapping oversight responsibilities; and a lack of avenues for Metro to appropriately course correct when

partners do not deliver the services or outcomes targeted in their budgets, work plans, or local implementation plans. This multi-layered complexity is at odds with the Region's need to address the homelessness crisis with urgency, transparency, and clarity.

Management believes that the recommendations outlined in the audit to improve the program should also be followed by a discussion among policy makers about whether the program would be better served by making changes to the governance structure or maintaining the status quo established by the measure, Metro Code language, and IGAs. Architects of the initial measure concept envisioned Metro as a "pass-through" entity, responsible for collecting and distributing a regional high-income tax to counties – where then the counties, with their experience and authority in homeless service provision, would have largely unlimited latitude in determining how best to use the funds.

Metro's role was to be focused on administration and facilitation. When the measure was being drafted in January and February 2020, there was some logic to that arrangement. Today, Metro's capacity to provide expert oversight is vastly different - and stronger. Most importantly however, the way the program was developed has arguably led to ambiguity in the relative roles of the governments and the meaning of oversight and accountability in this context. This ambiguity is itself a threat to the program as it undermines public trust and wastes time and resources on arguments about where responsibility and authority lie.

Also critical is that we be more nimble in responding to lessons learned. For instance, pre-pandemic assumptions about the homeless service system's resilience and ability to scale were wrong. The measure was referred to voters in February 2020, before the COVID-19 pandemic exacerbated systemic fractures and changed the landscape, including hiring practices, the labor pool itself and our ability to recruit and retain workers, particularly in this field. Serving those in need and delivering improved outcomes has turned out to not be as simple as pouring more money into existing programs. Regardless of the root-cause, the public and non-profit systems in place to serve people in need have struggled to absorb unprecedented funding, fueling the public's distrust and jeopardizing the program.

The current collaborative governance agreements were intended to ensure that the Counties have revenue stability to plan for and provide services, but as a result, Metro has very limited ability to react to either poor or excellent performance except through analysis and publication of data voluntarily provided by the Counties or through requesting actions by the Counties. Metro has almost no independent ability to react to good or bad outcomes by redirecting funds with any urgency. This is likely inconsistent with the expectations of Metro residents that Metro is ultimately responsible for achieving the best return on investment of Metro tax dollars.

While a critical examination of this program is vital, its potential to create a sizeable impact on one of the region's greatest crises must not be lost. Our hope is that the proposed actions and potential solutions embedded in the below response help pave that path forward.

Thank you again to Auditor Evans and his team for their thoughtful work in examining this critical program. Management's response to the Audit's recommendations and a short conclusion follows.

**To ensure timely and ongoing program oversight, the COO’s Office and Metro Housing should:**

**Recommendation 1. Set up a process to ensure each oversight body gets timely information about each other’s work**

**Response:** Management agrees that a continued focus on communication amongst the various oversight bodies is a critical element to the success of SHS. As a regional program, there are varying oversight roles that include Metro Council, the three County Boards of Commission and the Regional Oversight Committee (Supportive Housing Services Oversight Committee or SHSOC). In addition to the oversight bodies, the measure established the Tri-County Planning Body (TCPB), a policy body responsible for creating an SHS Regional Plan, guiding investments of the Regional Investment Fund (RIF) and strengthening coordination and alignment of program implementation across the region.

As expressed in the management introduction, this governance structure was established as a way of prioritizing oft forgotten values, like the importance of centering those most impacted in decision-making and the need for flexibility and autonomy in implementation. An unintended consequence of this construct is that layered oversight and role ambiguity can create significant delays in when information is exchanged, and how decisions are made.

While the below table intends to, at high-level, distinguish the varying regional and county oversight roles, management agrees with audit findings that current oversight duties outlined in varying governing documents create some ambiguity in scope, and can negatively impact how information is shared.

Body	Role
Metro Council	Regional oversight body providing policy direction by: <ul style="list-style-type: none"> <li>• Adopting Metro SHS Work Plan</li> <li>• Approving Local Implementation Plans</li> <li>• Appointing SHSOC members</li> <li>• Monitoring program outcomes, with guidance from SHSOC and TCPB</li> </ul>
SHS Oversight Committee (SHSOC)	Regional oversight body charged with: <ul style="list-style-type: none"> <li>• Reviewing County Annual Work Plans and proposing changes as appropriate to meet goals</li> <li>• Creating annual reports and presentations to all four governing bodies assessing performance, challenges and outcomes</li> <li>• Providing Metro Council / COO recommendations to improve implementation and advance the goals of the program</li> <li>• Monitoring fiscal aspects of program administration</li> </ul>



	<ul style="list-style-type: none"> <li>Monitoring jurisdictional and provider administrative costs and making recommendations for changes as appropriate</li> </ul>
County Boards of Commission	<p>County-specific oversight body charged with:</p> <ul style="list-style-type: none"> <li>Approving County LIP and recommending changes as appropriate to meet goals</li> <li>Approving County budgets and SHS-specific activities</li> <li>Overseeing county operations and county level program implementation</li> </ul>
Tri-County Planning Body (TCPB)	<p>Regional policy body responsible for:</p> <ul style="list-style-type: none"> <li>Developing a plan to regionalize standards and metrics, system alignment and standards of practice</li> <li>Approving Regional Investment Fund expenditures</li> <li>Monitoring Regional Investment Fund and regional plan implementation</li> </ul>

Current processes in place to support communication between governing bodies and timely status updates include:

- Monthly meetings with Metro Housing and co-chairs of all housing committees
  - Ensure co-chairs are informed of respective committee work
  - Allow for co-chairs to provide input and feedback on priorities
- Bi-weekly briefings with Metro Councilors and Metro Housing leadership
  - Staff provide updates on implementation and oversight, quarterly and annual report reviews, discuss SHS policy and implementation priorities
- Ex-officio seats on SHSOC for elected officials from each county and City of Portland
  - Non-voting members provide regular input and relay information from committee meetings back to their respective elected bodies
- Annual report and general progress presentations
  - SHSOC co-chairs present to Metro Council and the County Boards of Commission

**Proposed plan:** Metro Housing will establish a process to increase the timeliness for committees to learn about each other's work. Metro staff will engage each committee to better understand the need for more timely information. Metro Housing will also implement quarterly updates on committee work from the partner committee at TCPB and SHSOC meetings and incorporate links to all meeting minutes in meeting materials. Below is a timeline that outlines details and next steps for developing a process to ensure timely exchange of information. Additionally, Metro Housing will build out an annual Council Engagement Calendar to increase communication to Metro Council (described in recommendation 2) and review the SHSOC committee construct (described in recommendation 3).

**Timeline:**  
*January-March 2024 –*

- Metro staff obtain feedback from governing bodies on frequency and content of updates

*February 2024 -*

- Include links to meeting minutes of other committee meetings in TCPB and SHSOC meeting materials

*March 2024 -*

- Finalize Council Engagement Calendar
- Implement quarterly updates from committee counterparts as part of TCPB and SHSOC meeting agendas

## **Recommendation 2. Increase the frequency of program updates to Metro Council**

**Response:** Management agrees that to best support Metro Council's SHS regional oversight role, ongoing and frequent engagement is critical. As the audit points out, the complexity of the governance structure set up by the measure can obscure roles and responsibilities. In management's experience, it can also make it difficult to sequence the delivery of information in a way that respects the roles and responsibilities of each governance body (Metro Council, County Boards of Commission, TCPB and SHSOC), sometimes resulting in untimely distribution of information. Critical information may sometimes be released at county commission meetings or committee meetings without Metro's input. In management's view, the program would benefit from the establishment of a clear policy prioritizing information flow of the annual regional reports to the Metro Council first, as the funder and ultimate oversight body for the program.

There are also timing challenges that are structural. Per the IGA, counties must submit the annual report on October 31<sup>st</sup> of every year. Metro Housing staff and the SHSOC then conduct a thorough review of the report for alignment with LIPs, annual work plans and program compliance. Counties present the annual report to the SHSOC and then the committee develops a regional report in December and January. The goal of the annual regional report is to evaluate SHS program performance, identify challenges and opportunities and develop recommendations for Metro Council on how the program may be improved. Despite the increased frequency of committee meetings in January and February, four months between the receipt of county annual reports to creating and presenting the committee report to Metro Council is too long. As an example, SHSOC's first annual report was presented to Metro Council in June of 2023 but the findings were from FY 21-22. While the committee's second annual report will be presented to Metro Council in March 2024, the time between receipt of county reports and to presenting the committee report to Metro Council is still significant.

While Metro Housing staff currently utilize standing bi-weekly briefings, annual report presentations and ad-hoc work sessions to provide program updates to Metro Councilors, management agrees and sees a significant benefit to creating an engagement calendar that increases the number of public Metro Council SHS work sessions.

**Proposed plan:** Metro Housing will increase the number of public SHS work sessions with

Metro Council and document the plan for such engagements by establishing a Metro Council engagement calendar. The calendar will include key dates/timelines, SHS program updates, progress on committee efforts, status updates on related research (see recommendation 16) and other general topics of discussion. This calendar will also include proposals for county partners, SHSOC and TCPB to directly engage and provide updates to Council.

**Timeline:**

*January 2024 –*

- Gather input from Metro Councilors on engagement needs

*February 2024 –*

- Complete annual Council engagement calendar

*March 2024 –*

- Begin increased council engagement

**Recommendation 3. Get input from Metro Council, Tri-County Planning Body, and Regional Oversight Committee about the variety of experience needed to provide independent oversight among the members of the Regional Oversight Committee.**

**Response:** Management agrees that at this stage in the SHS Program, a review of committee membership and required skills or experience would be valuable to ensure committee responsibilities and scope can be effectively executed. Currently, per Metro Code Section 2.19.280, membership standards were established to prioritize those who participate in delivering the system and those most impacted by programmatic and governance decisions (such as people with lived experience of homelessness and BIPOC communities). This membership construct was a valuable starting place that reflected an intention of advancing equity and inclusion within this program. Now that SHS is in its third year of implementation, it is appropriate to evaluate membership gaps to provide effective oversight and deliver on the committee's charge.

Metro Housing currently maintains a matrix of membership requirements, tracks how committee membership reflects membership requirements and applies information regarding gaps in membership when recruiting new members. Committee membership incorporates staggered terms. Metro staff work directly with Council and SHSOC co-chairs when there is a committee vacancy to solicit guidance on the committee recruitment process and to obtain recommendations on membership experience to prioritize. Metro Housing recognizes this recommendation as an opportunity to deepen this review to include a scan of overall committee duties, associated skills and experiences and potential impacts to independent oversight.

**Proposed plan:** Metro Housing will obtain feedback from Metro Council and the SHSOC co-chairs about current membership criteria for the SHSOC compared to committee responsibilities to identify where there may be gaps in representation. Based on direction from Metro Council, Metro Housing will make changes to membership requirements (Metro Council has the sole authority to make changes to membership requirements and

Metro Code more broadly). Because TCPB is not an oversight body and does not have a role in determining the composition of the SHSOC, their feedback will not be solicited.

As part of this process, Metro Housing will also share with Metro Council and SHSOC the current practices to identify conflicts of interest and solicit feedback on where these practices may be improved upon to ensure independent oversight among members of the SHSOC.

**Timeline:**

*February 2024 –*

- Gather input from SHSOC co-chairs on membership requirements and priorities

*April 2024 –*

- Gather input from Metro Council on membership requirements and priorities.  
Provide Metro Council the recommendations solicited from SHSOC co-chairs to help inform any changes to membership requirements

*Summer 2024 –*

- SHSOC Annual evaluation of committee membership needs and conflict of interest disclosure

*Fall 2024 –*

- Share evaluation results with committee members and Metro Council
- Metro Council makes changes to Metro Code as needed to reflect updates in membership composition

**Recommendation 4. Document criteria and process for monitoring up to 25% of county program activities**

**Response:** Management agrees that clear monitoring criteria will be beneficial to the success of SHS. To ensure effective oversight and accountability, the SHS Workplan and IGA incorporate a variety of tools to support SHS compliance including but not limited to reporting, monitoring, program evaluation and auditing. Metro has the authority to monitor performance proactively, or when necessary, for cause.

In service to operational oversight and accountability obligations, Metro Council approved additional FTE to staff a quality and compliance team that will support SHS oversight, accountability and quality improvement in day-to-day operations.

**Proposed plan:** Metro Housing will establish monitoring processes, tools and document monitoring criteria used in the monitoring process. Metro Housing is working on establishing a quality and compliance team that will support monitoring, program evaluation, report analysis and other quality and compliance related activities. Recruitment started in January 2024. This team will be responsible for documenting and overseeing monitoring processes (to include ongoing monitoring and ‘for cause’ monitoring) and establishing a regular monitoring schedule. The quality and compliance team will also be responsible for other areas related to quality and compliance.

To move this work forward in the interim, Metro has secured a contract with a third-party consultant and is currently working with them to develop monitoring practices, including creating a risk assessment tool and criteria for risk areas, documenting compliance with the 25% requirement, and outlining the monitoring processes and requirements that will be launched in 2024. Because there is a wide range of monitoring needs (ex: data integrity vs program-specific monitoring vs fiscal monitoring), the tools will establish a clearer framework while not limiting Metro’s monitoring authority. These tools will directly address this recommendation, and Metro Housing will consult with the counties (per IGA requirement) prior to implementation.

**Timeline:**

*December 2023 –*

- Secure contract with third party contractor

*January 2024 –*

- Develop scope of work that includes practices and tools to meet monitoring needs

*January to February 2024 -*

- Develop monitoring framework and present to counties

*April 2024 –*

- Initiate monitoring for each county

*January to June 2024 –*

- Hire quality and compliance team

**Recommendation 5. Document criteria and process for implementing corrective action plans**

**Response:** Management agrees that documenting criteria and a process for implementing corrective action plans (CAPs) is valuable for all parties. The corrective action plan is intended to be a collaborative operational tool designed to fix problems and avoid the dispute resolution process. The IGA language governing CAPs creates a broad framework to acknowledge the wide range of known and unknown circumstances which could trigger the need for a corrective action plan. Additionally, the IGAs attempt to acknowledge the unique demands of each plan by requiring Metro to seek input from SHSOC and the county partner in developing the individual plans. Management notes that the CAP process is an area that warrants review of the intent versus the practical application of the process, as a successful CAP creation process is dependent on the cooperation of the counties to engage in a meaningful dialogue.

The active Multnomah County Corrective Action Plan (initiated in 2023) enabled Metro to establish and document the overall CAP process, timeline, communication/notification activities, reporting tools and a CAP template which will be used during future CAP implementations. Following the implementation of the Multnomah County CAP, Metro also captured lessons learned and best practices for future CAPs including enhanced role clarity, CAP process oversight, document integrity and communication standards.

**Proposed plan:** Metro Housing, in partnership with the Office of COO, FRS and OMA will continue to document CAP development and implementation processes to ensure transparency and program compliance. This will include process and documentation requirements for all CAPs, including:

- A clear problem statement that describes the activity/action that is at risk or out of compliance (see IGA section 6.3.5 for criteria)
- Documentation of efforts made to correct the problem prior to initiating a CAP (including input from SHSOC and county partner)
- Documentation of the reason why the CAP was initiated and documentation of CAP notice to the partner
- Documentation of the CAP development process including parties involved from each jurisdiction
- Documentation of templates and other tools required as part of the CAP
- Specific and measurable CAP outcomes and timeframes
- Process for tracking CAP progress-towards-goals
- All associated documents referenced in the CAP (ex: work plans, financial statements, etc.)
- Documentation of CAP outcome and next steps as appropriate

This process, the above-mentioned reporting tools and CAP template will be shared with all counties. Updates to steps and tools that may be required as part of future caps will also be documented and shared with partners.

**Timeline:**

*March 2024 -*

- Metro Housing to share CAP process, reporting tools and CAP template and any additional guidance with county partners

**Recommendation 6. Ensure the Regional Oversight Committee can fulfill its responsibilities by:**

- a. Providing a full list of responsibilities assigned to it**
- b. Providing sufficient data to evaluate administrative spending and make recommendations**
- c. Providing sufficient data to evaluate spending on populations A and B**
- d. Including data and recommendations about administrative spending and spending on populations A and B in the report to Council**

**Response:** Management agrees that a review of SHSOC duties and evaluation of committee performance is important at this stage of the SHS Program. While staff have established tools and processes to support committee roles and functions, there are still gaps (based on time, capacity and the stage of program implementation) in what the committee has been able to complete when compared to their overarching responsibilities. For example, the audit cites that the committee has not to date evaluated provider administrative costs. Due to the significant expansion of the service provider network over the last two and a half years and being at the initial stages of developing data collection and reporting capacity,

provider level administrative costs have not yet been reported. As a result, the committee has not been able to fulfill their obligation to review service provider administrative costs. This information will be incorporated into year 3 reporting tools.

As the system stabilizes, and more data becomes accessible, Metro Housing is updating reporting templates to obtain and share all necessary information for the committee to effectively execute its roles and obligations. Additionally, refinements to reporting templates have been made in response to SHSOC Annual Report recommendations.

**Proposed plan:** Metro Housing, in partnership with the SHSOC, will review the committee role and responsibilities as mentioned in governing documents (including SHS measure, SHSOC Charter and Metro SHS Workplan) and note inconsistencies in language. Metro staff will also take administrative steps to update committee practices and governing documents as needed to reflect all duties and responsibilities outlined in governing documents. Metro Housing will also partner with SHSOC to review progress toward each duty and identify gaps and barriers to progress. The SHSOC member onboarding process will be documented to demonstrate the actions taken to review roles and responsibilities.

Additionally, an enhanced fiscal review will be incorporated into existing committee quarterly regional financial reports and presentations, including special attention to administrative expenditures. Expenditures specific to populations A and B will be captured in the year 2 SHSOC Annual Report, and future recommendations related to this data will be included as needed. The below timeline will address the specific actions to respond to each bullet embedded in this recommendation.

Next steps by A-D recommendations (timeline to follow):

**A** - Staff will review all SHSOC language related to roles and responsibilities across governing documents with the committee and update as needed. Updates will be provided to all current committee members and to future members as part of onboarding. Staff will update the onboarding process to review roles and responsibilities in the updated charter. Metro Council may amend governing documents as necessary.

**B** - Beginning with the FY23-24 Q1 report which will be submitted in January 2024, Metro staff will discuss jurisdictional administrative expenditures as part of quarterly financial presentations. In the year 2 (FY22-23) annual report, Metro will include additional information on administrative expenditures and a comprehensive regional financial report will be included as an exhibit.

**C** - SHSOC will review population A and B spending as part of the year 2 annual report process and provide recommendations as appropriate.

**D** - Information about administrative spending and spending on populations A and B will be a part of the year 2 annual report that will be shared with Metro Council in March of 2024. Metro staff will include an overview of the committee's responsibilities as part of the process in developing the report and associated recommendations to Metro Council. This will be expanded to include service provider administrative costs in year 3 annual report. The committee may make recommendations as they deem necessary.

## **Timeline**

### *January 2024 –*

- Compile a list of all SHSOC responsibilities as described in the various governing documents. A list of responsibilities will be provided to the committee and discussed as part of the annual report development agenda item.
- Incorporate jurisdictional administrative spending into the year 2 annual report and discuss with the committee. Incorporate population A and B spending into the SHSOC annual regional report.

### *April 2024 –*

- Metro Housing and SHSOC co-chairs review committee responsibilities and identify language to update in governing documents to ensure alignment and consistency
- Metro Housing and SHSOC co-chairs review progress towards each responsibility and identify gaps and barriers to progress
- Metro Housing update SHSOC onboarding process to include any updated roles and responsibility

### *May 2024 –*

- Metro to work with Counties to update reporting templates (to include SHSOC reporting recommendations)

### *June 2024 –*

- Metro Council amends governing documents and code as appropriate and in alignment with IGA (8.2.4)

### *July 2024 –*

- Use updated report templates at beginning of new fiscal year

### *October 2024 –*

- Include additional information on administrative costs in year 3 annual report. Metro will expand administrative cost reporting to include:
  - Service provider administrative costs
  - Additional detail on county administrative costs

### *February 2025 –*

- Deliver third annual SHSOC regional report and presentation to Metro Council and County Boards of Commissioners which will include an assessment of jurisdictional and non-profit partner administrative costs

## **Recommendation 7. Establish an annual process for Metro Council, Tri-County Planning Body, and Regional Oversight Committee to review the funding allocations for each county and adjust if needed**

**Response:** Management agrees that establishing a process for review of funding allocation percentages is an important step in adhering to IGA requirements (section 3.3 of IGA). Part of that process will include identifying frequency; annually may not be the right cadence based on administrative complexity.

**Proposed plan:** Metro Finance will lead the development of this process with the Finance Review Team (FRT), a technical committee charged with assessing income tax collections and the region's overall financial health (IGA, section 6.2).



**Timeline:**

*Fall 2024 –*

- Metro Finance will develop a process to review funding allocations with FRT

*Winter 2024 –*

- Allocation process shared with Metro Council and SHSOC

**To improve the reliability and consistency of program performance data, Metro Housing should:**

**Recommendation 8. Clarify the goals related to serving 5,000 people and 10,000 households**

**Response:** Management agrees that clarifying language related to goals will allow for clearer communication and better understanding of those goals. As noted by the auditor, the SHS work plan, SHS website and the Metro Housing budget differ in language such as people or households served. Metro Housing will review and align all goal related language for clarity.

Each goal utilizes a unique set of services that count toward that goal which will be addressed in the next response. Metro Housing will identify and address inconsistencies in language regarding the 5,000 and 10,000 goals.

**Proposed plan:** Metro Housing will review documents that contain references to the 5,000 and 10,000 goals and address inconsistencies.

**Timeline:**

*Winter 2024*

- Metro Housing to review written materials that reference the 5,000 and 10,000 goals and identify inconsistencies

*Spring 2024*

- Metro Housing to update all materials for consistency

*July 2024*

- Incorporate updated language in reporting tools and templates

**Recommendation 9. Define which service types are used to report on progress towards the 5,000 and 10,000 goals.**

**Response:** Management agrees that defining which service types are used to report on progress towards the 5,000 and 10,000 goals is key to evaluating and communicating progress toward those goals. There are different service types that Metro has defined to capture the continuum of homeless services in the different counties. Every household served with the specific services below counts as 1 toward the 5,000 or 10,000 goal. Services that count toward the 5,000 and 10,000 goals are as follows:

Services that count toward 5,000 goal:

- **Permanent supportive housing** - service intervention that includes a housing unit with wrap-around services and long-term rent assistance
- **Long-term rent assistance** - long term payment of rent for a household to support long term housing stability

Services that count toward 10,000 goal:

- **Short-term housing assistance** includes:
  - rapid rehousing (placement into housing with services. Typically, up to 2 years) and;
  - eviction prevention rent assistance. Typically, between 1-6 months of rent assistance to avoid eviction.

Work taking place in standards of practice, program evaluation and monitoring will provide further clarity and definition of SHS services and how they advance the 5,000 and 10,000 goals. The goal of 5,000 is primarily respective to population A and the 10,000 goal is primarily respective to population B.

**Proposed plan:** Metro staff will work with county implementation partners, in partnership with the TCPB and SHSOC, to review definitions, clarify and document the services that count toward the 5,000 and 10,000 goals. Following this engagement, Metro Housing will update documentation and reporting templates to reflect any changes.

**Timeline:**

*March 2024*

- Metro will share a memo communicating the current state of services reflected in the 5,000 and 10,000 goals

*May 2024*

- Metro staff will work with county partners and engage the SHSOC and TCPB to clarify and update service areas as appropriate

*June 2024*

- Share updates with SHSOC, TPB and Metro Council

*July 2024*

- Update definition and glossary included in updated reporting tools
- Expand reporting tool guidance to outline which services are reflected in the 5,000 and 10,000 goals

*February 2025*

- Delivery year 3 annual report with updated information

**Recommendation 10. Develop a performance measure to measure the quality of services provided.**

**Response:** Management agrees that quality services are critical to meeting the intended outcomes of this program. As SHS moves from its development phase to sustained program delivery, program evaluation, standards of practice and quality of services must be prioritized and will become a deeper focus area for Metro Housing. As mentioned in response to recommendation 4, Metro Housing is hiring a quality and compliance team that will support quality assurance. Metro Housing also has a team of policy staff who are central to advancing this work, which is currently under way.

An example of this is seen in permanent supportive housing (PSH). Permanent supportive housing is a proven best practice and effective service intervention for those who have very high and persistent barriers to housing stability (defined as Population A in SHS). While PSH has been a regular practice in greater Portland, it has been under structured due to funding and capacity constraints. SHS presents an opportunity to address these gaps. Metro Housing has dedicated capacity and defined the scope for a new body of work that will establish SHS standards for PSH. This will include clarifying eligible populations, establishing clear definitions, levels of care and service models. As part of this work, a study is being conducted to clarify the cost of PSH, required infrastructure and service components necessary for effective service delivery and positive outcomes for PSH participants. Establishing standards of quality for PSH and operational oversight structures will be products of this effort.

Metro and county implementation partners are building capacity and infrastructure to begin new bodies of work like the one mentioned above. Metro will use tools like data sharing agreements with county partners to advance program performance, efficacy, quality and integrity and ultimately lead to better quantitative and qualitative analysis.

**Proposed plan:** Metro Housing will establish the first performance measurements that measure service quality in FY2024. As mentioned in recommendation 4, Metro Housing will hire the quality and compliance team by June 30, 2024. Recruitment of data staff was launched in December and will be followed by quality and compliance recruitments in January. These staff members will play roles in advancing quality measures. To support this work further, Metro Housing has secured contracts with several third-party experts who bring a variety of technical expertise in these areas to address immediate needs in program evaluation and ultimately in establishing quality measurements.

**Timeline:**

*February-June 2024*

- Hire quality and compliance team

*March 2024*

- Establish scope of work with consultant

*April-September 2024*

- Research and development with consultant

*December 2024*

- Establish measurement of quality and process for evaluation

**Recommendation 11. Use existing data to provide more context for county and regional performance by adding the following to quarterly and annual reports:**

- **Retention and returns to homelessness compared to the number of people served**
- **The capacity of permanent supportive housing compared to the overall need**

**Response:** Management agrees that timely access to information is critical to effective oversight and successful program implementation. Housing retention and returns to homelessness compared to people served and the capacity of PSH compared to the overall need, respectively, are already included in annual reports. Note that this information was not included in the first annual report but will be included in all subsequent annual reports. This information is not currently included in quarterly reports. Data reported annually tells a more comprehensive and accurate story than data collected on shorter intervals.

The capacity of permanent supportive housing compared to the overall need is intentionally only reported annually. This data element is best reported annually due to the nature of the measurement and time necessary to draw accurate conclusions from the data. However, Metro Housing does agree that tracking retention and returns to homelessness quarterly could add value.

**Proposed plan:** Retention rates for Permanent Supportive Housing and Rapid Re-Housing, length of time homelessness, returns to homelessness and PSH capacity compared to need have been incorporated into the county year 2 annual reports and will be incorporated into the SHSOC regional report to be released in late winter. Metro Housing will work with counties to address potential barriers to reporting retention and returns to homelessness compared to people served quarterly. Metro Housing will update quarterly reports to include this information once barriers are addressed.

**Timeline:**

*March 2024 –*

- Include housing retention rates, returns to homelessness and PSH units created compared to need in year 2 annual report and share with Metro Council
- Work with counties to update report templates

*July 2024 –*

- Implement new reporting standards in new fiscal year

**12. Create a process to check the accuracy of county quarterly and annual reports and require counties to identify if they have revised data provided previously**

**Response:** Metro Housing agrees that effective review of reports and clarity regarding new data that changes previous quarter outcomes is critical for effective oversight and successful implementation of SHS. Metro Housing's current process includes regularly reviewing all reports and related documents (such as quarterly and annual reports and budget templates) for accuracy, completeness and adherence to SHS requirements. Additionally, Metro staff have developed tools to evaluate county performance to annual,

LIP and ten-year goals, adherence to requirements, standards and other key evaluation areas in annual reports submitted by the counties.

Management agrees that this process can be strengthened, and dedicated capacity is critical to support this function. The quality and compliance team mentioned in the responses to recommendations 4 and 10 will play a significant role in supporting and improving the report review and analysis process.

Management agrees that future reports should indicate updates to data shown on prior reports but will not require counties to resubmit prior quarter's reports. Reports are reflective of data collected at a specific point in time which can result in actuals changing over time.

**Proposed plan:** Metro staff will continue to improve the report review processes by establishing a quality and compliance team that will focus on review and analysis processes improvements and improving tools to analyze reports. Metro Housing will work with county staff to update report templates to include updated data from previous quarters.

**Timeline:**

*February-June 2024 –*

- Hire quality and compliance team

*May 2024 –*

- Work with county staff to update reporting templates

*July 2024 –*

- Implement new reporting templates

*September 2024 to April 2025 –*

- Develop additional tools to assess and evaluate reports and update report evaluation process

*May 2025 –*

- Update templates and process to reflect new tools

*July 2025 –*

- Implement updates to report evaluation process

**Recommendation 13. Update reporting templates to:**

- **Add data about the percentage of the counties' total spending that comes from SHS**
- **Add line items for spending on each service type provided**

**Response:** Management agrees that report templates need to be clear about financial expenditures. Regarding the recommendation to add data about the percentage of total spending that comes from SHS, current financial reports do not include financial information about other funding sources. Metro cannot obligate counties to report on non-SHS-funding sources or activities, and SHS reports are currently only specific to activities and households funded by SHS.

That said, SHS was always intended to be a funding source infused into existing and new homeless services programs and systems. It would be beneficial for the public to understand the impact of SHS on homeless services as part of a broader homeless services system. Metro recognizes the value of sharing system-wide reporting and has expressed this position with county partners and encouraged system wide-reporting.

Reporting templates are improved on an annual basis and those changes are implemented with each new fiscal year. Changes are based on feedback from the SHSOC, Metro Council and staff evaluation of how well the current reporting requirements and tools serve the needs and goals of the program and effective oversight.

Regarding the recommendation to add line items to reporting templates broken down by service type, Metro Housing is currently taking administrative steps toward incorporating service type specific line items and associated expense lines into budget and reporting templates.

**Proposed plan:** Staff will work with county implementation partners to update budget and reporting templates to show expenditures by service types. Metro will also explore opportunities to better understand the impact of SHS in homeless services system of care.

**Timeline:**

*January-March 2024 –*

- Gather report template feedback from key stakeholders

*May 2024 –*

- Develop report template changes in partnership with counties and explore opportunities to understand and communicate the impact of SHS in the system more broadly

*July 2024 –*

- Implement report template changes with the new fiscal year

**To identify programs that provide efficient, effective, and equitable services to inform long-term planning, the Tri-County Planning Body should:**

The following four recommendations are specific to the Tri-County Planning Body (TCPB). To provide succinct responses, we are including the following information about the role of the TCPB and its approach to advancing the committee charge.

The TCPB was conceived of during the development of ballot measure 26-210 to ensure that certain systems supporting homeless services funded by the measure could be regionalized. Specifically, this body is charged with developing a regional plan and is “responsible for developing and implementing a tri-county initiative that will be responsible for identifying regional goals, strategies and outcome metrics related to addressing homelessness in the region.”

Upon the launch of the TCPB in September 2022, committee members prioritized identifying regional goals over developing a full regional plan in the interest of accelerating program implementation. Considering the growing scale of the ongoing housing crisis and the acute impacts of the COVID-19 pandemic, the TCPB believed that urgency should be its driving principle in its first phase of work. This approach meant that in its first year, the TCPB worked with Metro and county staff to select a set of goals that could be implemented to address the most pressing regional needs. They are as follows:

- Regional Landlord Recruitment: Increase the availability of readily accessible and appropriate housing units for service providers;
- Healthcare System Alignment: Greater alignment and long-term partnerships with healthcare systems that meaningfully benefit people experiencing homelessness and the systems that serve them;
- Coordinated Entry: Coordinated Entry is more accessible, equitable, and efficient for staff and clients;
- Training: Service providers have access to the knowledge and skills required to operate at a high level of program functionality; the need of culturally specific providers will be prioritized through all program design;
- Technical Assistance: Organizations have access to technical assistance required to operate at a high level of organization functionality; the need of culturally specific providers will be prioritized through all program design;
- Employee Recruitment and Retention: County contracts for SHS funded agencies and providers will establish standards through the region to achieve livable wages for direct service staff.

These initial goals were established in direct response to existing challenges and opportunities for successful implementation and regionalization of SHS. Since the above goals will be incorporated as major components of the overall regional plan, we remain on track in its development. And there is much work for the TCPB to consider in its second year alongside the development of the goals, including data, reporting, metrics and other key areas that will advance the goal of regionalization. It also means that the development of the plan will be incremental as certain strategies will be implemented while other parts of the plan remain in process. The conditions for regionalization are dynamic and require an iterative approach that allows for maximum responsiveness to changing demands and opportunities. The regional plan is a living document that will be built and added to throughout the program's life. The TCPB will refer Regional Plan language to the SHSOC for approval and incorporation into the plan and ultimately, Metro Council will adopt the plan. The expected incorporation of implementation strategies for the six initial goals into the plan is December 2025.

#### **Recommendation 14. Research relevant studies of the program impacts on SHS' target populations**

**Response:** Management agrees that research of relevant studies is a critical component in the success of the SHS program. It is also a foundational element in the development of the

Regional Plan and several bodies of research are currently active (more information below). The TCPB is working with Metro, county staff and a group of consultants to develop a plan that moves SHS from three separate county programs to a regional system of care. Research is incorporated into the scope of this work.

Metro staff have established consultant contracts to support each goal area outlined above. The initial scope of work for consultants is to research national best practices and assess the current local landscape, challenges and opportunities. Metro staff manage the consultant contracts and are responsible for staffing the development of the plan. Initial consultant deliverables also include identifying specific opportunities and recommendations for advancing goals based on the results of research and local conditions. The TCPB receives a consultant report and presentation of research, findings and recommendations for their consideration which they then use to provide guidance to counties in each of the six goal areas. County and Metro staff then work together to develop a proposal including strategies, action items, timelines, goals and metrics and a budget framework to operationalize committee recommendations. The committee provides feedback and additional guidance until the proposal by counties adequately meets the committee's recommendations. TCPB received the presentation on the landlord recruitment goal from the consultant in November 2023 and provided recommendations to the counties. Timelines for receiving consultant reports on the other bodies of research are outlined below.

**Proposed plan:** Metro Housing will continue to conduct research in collaboration with consultants as a foundational step in developing the content of the Regional Plan and bring the findings of that research to the TCPB. As mentioned above, once the TCPB receives presentations on each goal area, they will provide recommendations and guidance to the counties. The counties will then work with Metro staff to develop a proposal in response to those recommendations. Metro Housing anticipates that the delivery of initial research to the TCPB in each of the six areas will be complete by the end of FY23-24 and that the approval of county proposals will be complete by December 2025. Below is a timeline for when the TCPB will receive the first set of research findings per goal area.

**Timeline:**

*November 2023 –*

- Landlord recruitment presentation and discussion

*January 2024 -*

- Healthcare System Alignment presentation and discussion

*March 2024 -*

- Employee Recruitment and Retention presentation and discussion

*April 2024 -*

- Coordinated Entry presentation

*May 2024 -*

- Training presentation and discussion

*June 2024 -*

- Technical Assistance presentation and discussion



## **Recommendation 15. Research best practices for communicating program results to increase understanding among decision-makers and the public**

**Response:** Management agrees that researching and applying best practices in communicating program results and progress-towards-goals will strengthen decision-making and improve public trust. Additionally, a key recommendation that the SHSOC provided to Metro Council in their first annual report was for Metro staff to lead a cross-jurisdictional effort to improve communication about the SHS Program, to help the public better understand SHS implementation, progress and outcomes.

**Proposed plan:** Metro Housing is developing a communications strategy that strengthens the ability of decision-makers and the public to track progress towards goals in the SHS program. The department recently hired a communications manager who is leading this effort. Additionally, per the recommendation of the SHSOC, Metro Housing is in the process of contracting a third-party communications expert to support the development of a cross-jurisdictional communications plan. Part of the scope includes conducting research to ensure that communications methodologies used are grounded in research-based best practices. This body of work will be monitored by the SHSOC as part of tracking progress towards annual report recommendations. Metro staff will provide updates to the SHSOC and Metro Council and conduct evaluations to determine the effectiveness of the communications plan.

### **Timeline:**

*January-March 2024*

- Launch procurement and select contractor to support development of communications plan

*March-August 2024*

- Develop core narrative construction and best practices for communications, including engaging key partners and stakeholders on communication strategy

*September-November 2024*

- Develop communications plan

*January – February 2025*

- Present communications strategy to SHSOC and Metro Council

*March 2025*

- Plan implementation/launch public communications efforts

*June – December 2025*

- Develop evaluation process to monitor effectiveness of communications plan

*January – March 2026*

- Conduct evaluation of communications plan

*April-May 2026*

- Finalize evaluation findings

*June 2026*

- Present findings of communications plan evaluation to SHSOC and Metro Council

**Recommendation 16. Advise Boards of Commissioners, Metro Council, and Metro Housing periodically on the results of the research**

**Response:** Management agrees that providing updates on the results of research would advance the TCPB’s charge of developing a regional plan.

The TCPB was intentionally designed to provide touchpoints to all four jurisdictional elected bodies by conferring full membership to an elected official from each county and Metro Council. These TCPB members are expected to report back to their respective legislative bodies the progress of the TCPB, including relevant research and analysis. Also, Metro staff meet with Metro Councilors bi-weekly and provide TCPB updates to during those briefings. However, we believe that increasing the proximity of the TCPB to the implementing jurisdictions will accelerate the work of regionalizing homeless services.

**Proposed plan:** Metro Housing will work with the TCPB co-chairs to establish a new process and schedule for presenting directly to county boards and Metro Council.

**Timeline:**

*March-May 2024*

- Develop a schedule for providing general updates and advising Boards of Commissioners, Metro Council and Metro Housing periodically on research findings

**Recommendation 17. Advise the Regional Oversight Committee and Metro Housing about best practices for communicating program results to ensure understanding**

**Response:** While the TCPB does not have a formal role to advise the SHSOC, management agrees that increased collaboration between the SHSOC and the TCPB would benefit much of Metro Housing’s work, including implementing best practices for communicating program results.

Metro Housing has developed structures to foster collaboration among committees and facilitates a monthly meeting of committee co-chairs from SHSOC, TCPB and Affordable Housing Bond Oversight Committee. Agendas are developed with input from co-chairs and address various intersecting issues. Effectively communicating program results is a critical component of Metro Housing’s future communications strategy, and directly intersects with both work of the TCPB and SHSOC. SHSOC, TCPB and Metro Council will be briefed on best practices as part of communication plan updates.

**Proposed plan:** Metro Housing will include a new standing agenda item for monthly co-chair meetings to facilitate input from the TCPB co-chairs on effectively communicating program results.

**Timeline:**

*January 2024*

- Include new standing agenda item in monthly co-chair meetings beginning where discussion on best practices on communicating program results can take place.

*TBD/ongoing*

- Information about best practices for communicating program results shared by consultant will be shared with SHSOC and TCPB upon receipt of deliverables.

### **Recommendation 18. Use research, program data and financial projections to inform strategies for the regional program**

**Response:** Management agrees that effective strategies must be informed by data, analysis and sound budgeting. These are all elements currently included in the development of any policy at the direction of the TCPB and will continue to be incorporated as this work grows.

**Proposed plan:** As we enter year two of the TCPB, we remain heavily engaged in research and analysis through the work of our consultants and staff on each of the six regional goals. The scopes of work for each of the six regional goals reflect these elements. In its first year, the TCPB received briefings on various research and program data to inform its decision-making, and in September and November 2023, the committee received a briefing on the Regional Investment Fund and projections for FY24. In the coming months, the TCPB will deliberate on budgeting the RIF for the first time. At that point, the TCPB will receive additional financial information and analysis to support their decision-making.

As the work of the TCPB moves from research and analysis and into the development of the Regional Plan, the committee will approve specific strategies, a budget framework and metrics for each goal area. Once a county plan is approved and incorporated into the Regional Plan, the committee will receive quarterly progress reports and presentations on that component of the Regional Plan including a review of financial expenditures to assure alignment with the budget framework associated with that body of work. This quarterly review process will allow for discussion and opportunities for process improvement.

This work is ongoing, and over the next two years, the TCPB will approve county plans related to each of the six regional goals based on research, program data and financial projections to inform their strategies.

#### **Timeline:**

*Spring 2024 –*

- TCPB develops budget framework for landlord engagement

*January 2024-December 2025 –*

- TCPB review and approve county plans based on six regional goals and receive quarterly updates on plans following approval
- Document how the strategies to meet Regional Plan goals are informed by research, program data, and financial projections

In closing, this program has been described as an ambitious moonshot to address homelessness in our region. It is not perfect, but it is Metro's firm belief that the ambition inherent in the creation of this program and the faith of the public who approved it can and will be fulfilled. As is reflected in the auditor's findings and management's response, rigorous examination of how the SHS program has worked so far, what aids the mission and what detracts from its mission is a critical part of its future success and not something to shy away from. What is called for in this moment is persistence, discipline, and sustained attention. Metro may not have had a deep bench of homeless service expertise at the beginning of this journey, but it does have decades of experience leading the regionalization of systems that work better for the public when they are considered together. What Metro has learned through the regionalization of the solid waste system, parks and natural areas, and land use planning is that corrections, realignments, struggle and even the occasional failure are normal – so long as honest lessons can be learned and acted upon, these struggles are never in vain. Metro, its management and leadership, is committed to bringing the full strength of its institutional experience to the table along with the broad array of our partners to see this program through to success.

Management expresses our gratitude to Auditor Evans and team for performing this audit and for the opportunity to submit a management response.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Madrigal".

Marissa Madrigal, Chief Operating Officer



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