

# HOMELESSNESS INITIATIVES IN NEW ORLEANS

PERFORMANCE AUDIT SERVICES

March 21, 2025

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March 21, 2025

The Honorable J. Cameron Henry, Jr.  
President of the Senate  
The Honorable Phillip R. DeVillier,  
Speaker of the House of Representatives

Dear Senator Henry and Representative DeVillier:

This report provides the results of our performance audit of homelessness initiatives in New Orleans. The purpose of this audit was to provide information on funding and services, evaluate overall coordination, and identify processes that could be improved.

We found that between January 2019 and June 2024, the City of New Orleans (City) and UNITY of Greater New Orleans (UNITY) spent \$216.3 million on homelessness initiatives, primarily from federal funds. Of that, \$122.4 million (56.6%) went to permanent supportive housing programs, which provide long-term rent subsidies and supportive services for individuals experiencing homelessness who also have a disability.

We also found that the City, the Louisiana Housing Corporation (LHC), and UNITY have processes to monitor providers; however, most fiscal and programmatic compliance monitoring was suspended during the COVID-19 pandemic.

In addition, the New Orleans Continuum of Care needs increased collaboration among the City, UNITY, and providers to develop and implement a cohesive strategic plan to address homelessness in New Orleans. Neither New Orleans nor UNITY has a current strategic plan to address homelessness; however, the City is developing such a plan.

We found as well that 275 individuals have been housed through targeted encampment decommissioning, according to UNITY and the Office of Homeless Services and Strategy (OHSS). Overall, OHSS's process for decommissioning encampments generally followed city ordinances and best practices.

Additionally, the City is not providing adequate oversight of shelters to ensure they follow minimum health and safety standards, especially given the vulnerability of the population residing in the shelters. While the City has a process to conduct fiscal and programmatic monitoring of the shelters it funds, it does not

regularly inspect these shelters to ensure they are meeting the U.S. Department of Housing and Urban Development's (HUD) habitability standards.

We found, too, that family coordinated entry for shelters is not always accessible for families in need, because it is not always easy for them to contact UNITY. In addition, UNITY did not always conduct annual evaluations and surveys of coordinated entry as required by HUD and UNITY's policy.

Providers we surveyed indicated that the City and UNITY need to improve communication, including better availability and responsiveness to providers, clarity regarding policies and procedures, and more timely reimbursements. In addition, information about available resources is difficult to find and may be out of date.

New Orleans faces multiple challenges to effectively address homelessness. Lack of affordable housing, as well as the need for living wage employment opportunities, is a primary driver of homelessness. Other challenges include behavioral health and substance use needs, transportation, funding, and staffing levels.

The report contains our conclusions and recommendations. I hope this report will benefit you in your legislative decision-making process.

We would like to express our appreciation to the City of New Orleans' Office of Housing Policy and Community Development, the City of New Orleans' Office of Homeless Services and Strategy, the Louisiana Housing Corporation, and UNITY of Greater New Orleans for their assistance during this audit.

Respectfully submitted,



Michael J. "Mike" Waguespack, CPA  
Legislative Auditor

MJW/aa

# Louisiana Legislative Auditor

Michael J. "Mike" Waguespack, CPA



## Homelessness Initiatives in New Orleans

March 2025

Audit Control #40230032

## Introduction

We evaluated homelessness initiatives in New Orleans between January 2019 and December 2024 in response to a legislative request that asked us to evaluate the effectiveness of these initiatives. Several entities are involved with administering homelessness initiatives in New Orleans, including the City of New Orleans (the City), UNITY of Greater New Orleans (UNITY), and the Louisiana Housing Corporation (LHC). LLA requested a SQL backup of the Homelessness Management Information System (HMIS) database,<sup>1</sup> as well as access to individual client files, including but not limited to those containing personal identifiable information, as needed to verify data entered into HMIS. However, because UNITY did not provide the LLA access to all of the information we requested, we were unable to evaluate the outcomes associated with homelessness programs and activities. As a result, this report provides information on funding and services, evaluates overall coordination, and identifies processes that could be improved.

Homelessness is a complex social issue with a variety of underlying economic and social causes such as poverty, lack of affordable housing, physical and mental health conditions, substance use disorders, and family breakdown. These factors, in varying combinations, contribute to the duration, frequency, and type of homelessness that individuals or families may experience.

United States (U.S.) Department of Housing and Urban Development (HUD) regulations regarding the Continuum of Care define someone as **"homeless"** if they:

- (1) are an individual or family who lacks a fixed, regular, and adequate night-time residence, such as residing in public places not ordinarily used for sleeping accommodations or temporary facilities, or
- (2) will imminently lose their housing and have no place to go, or
- (3) are unaccompanied youth under 25 years of age, or
- (4) are fleeing domestic violence, dating violence, sexual assault, or stalking.

**Source:** 24 Code of Federal Regulations (CFR) § 578.3

<sup>1</sup> HMIS is used to collect client-level data and data on the provision of housing and services to individuals and families at risk of and experiencing homelessness. See Appendix B for information about our request and analyses we were unable to perform.

**Homelessness Trends.** According to annual Point-in-Time (PIT) counts, the number of unhoused individuals in the New Orleans area<sup>2</sup> increased by 22.4%, from 1,188 in January 2018 to 1,454 in January 2024. However, unsheltered homelessness decreased 18.5% during the same timeframe, from 594 to 484. PIT counts are performed on one night during the last 10 calendar days of January each year to estimate the size of the unhoused population; however, this method undercounts the true extent of homelessness in an area because the count is of a single night. For example, according to a UNITY data report, shelters served 5,651 individuals in calendar year 2024, and street outreach served 2,265.<sup>3</sup> Exhibit 1 shows the annual PIT counts for the New Orleans area for January 2018 through January 2024.

**PIT Count Types**

**Sheltered homeless** – the number of people living in emergency shelters or in homeless transitional housing.

**Unsheltered homeless** – the number of people observed living in places not designed for or ordinarily used as regular sleeping accommodations/not intended for human habitation (e.g., cars, abandoned buildings, campgrounds, etc.).

**Source:** 24 CFR § 578.7

<b>Exhibit 1 Point-in-Time Counts for the City of New Orleans and Jefferson Parish January 2018 through January 2024</b>								
Type of Homelessness	2018	2019	2020	2021	2022	2023	2024	Percent Change
Sheltered	594	749	759	560	850	837	970	63.3%
Unsheltered	594	430	555	482	364	553	484	-18.5%
<b>Total</b>	<b>1,188</b>	<b>1,179</b>	<b>1,314</b>	<b>1,042</b>	<b>1,214</b>	<b>1,390</b>	<b>1,454</b>	<b>22.4%</b>
<b>Source:</b> Prepared by legislative auditor’s staff using information from HUD.								

**Continuum of Care (CoC).** In 1994, the federal government established the CoC system to combat homelessness at the local level. Each CoC must designate a lead organization as its collaborative applicant for HUD CoC program funding, as well as to carry out administrative responsibilities for the CoC. There are various entities involved in the New Orleans area CoC:<sup>4</sup>

<sup>2</sup> Including Jefferson Parish.

<sup>3</sup> Based on unaudited HMIS data reports provided by UNITY.

<sup>4</sup> HUD designates the New Orleans area as LA-503 – New Orleans/Jefferson Parish CoC, which includes New Orleans and Jefferson Parish. For the purposes of the report, we refer to it as the New Orleans area CoC.

- **UNITY** is a nonprofit collaborative of multiple organizations that provide housing and services to people experiencing homelessness in New Orleans and Jefferson Parish. UNITY’s mission is to coordinate community partnerships to prevent, reduce, and end homelessness. It is the lead agency and collaborative applicant of the CoC, and its responsibilities include managing the day-to-day operations of the CoC, facilitating communication and coordination between different organizations involved in addressing homelessness, tracking the effectiveness of CoC funding projects, assembling and submitting the annual application for HUD CoC program funding, and designating a lead agency to oversee the HMIS database. For most providers in the CoC, UNITY receives the CoC grant funding and enters into sub-grants with providers.

**A Continuum of Care (CoC)** is a group of organizations, such as homeless service providers, state and local government entities, and other stakeholders, that receives HUD funding to carry out the goal of ending homelessness within a specified geographic area.

**Source:** 24 CFR § 578.3

The CoC Governing Council<sup>5</sup> is the board of the CoC and is also responsible for carrying out the duties of the CoC. As part of the annual CoC application process, the Governing Council is responsible for scoring and ranking which CoC programs HUD should fund. UNITY also has a Board of Directors that oversees the nonprofit organization.

- **The City** has several departments involved in homelessness initiatives:
  - **The Office of Homeless Services and Strategy (OHSS)** was created in February 2023 to create solutions to assist the unhoused population through expanding resources, outreach, and partnerships, in addition to focusing on the root causes of homelessness. OHSS aims to connect individuals and families experiencing homelessness with the resources they need to regain stability and self-sufficiency, including emergency shelters (shelters), food assistance, health care, job training, legal aid, and other services. One goal of this office is to create a strategic plan to move the homelessness services system forward and hold all the teams in homeless services accountable.
  - **The Office of Housing Policy and Community Development (OCD)** coordinates homelessness initiatives among City departments. *The Neighborhood Services and Facilities Unit* within OCD administers HUD grants, connects people to housing and services, contracts with and monitors agencies funded for programmatic compliance, and provides technical assistance to

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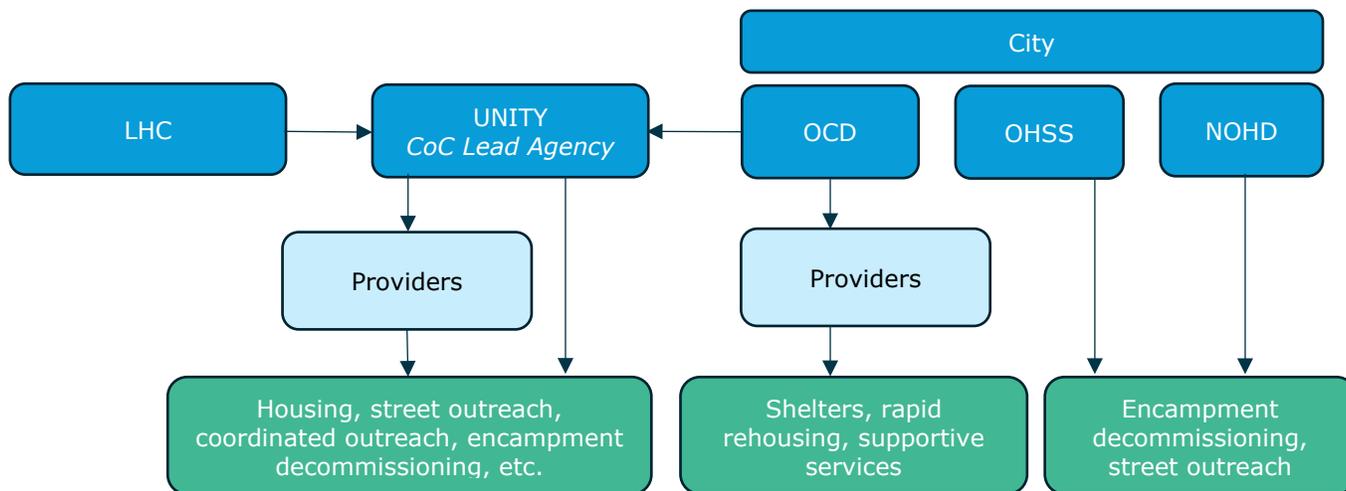
<sup>5</sup> The CoC Governing Council comprises 23 members from various areas, including the City of New Orleans government, Jefferson Parish government, LHC, the Louisiana Department of Health, local housing authorities, service providers, formerly-unhoused individuals, and community representatives.

agencies who receive funding to deliver community service programs. OCD oversees shelters in the City that are funded through Emergency Solutions Grants (ESG).

- **The New Orleans Health Department (NOHD)**, along with OCD and the New Orleans Police Department (NOPD), direct weekly outreach while cleaning homeless encampments. These cleanups provide the opportunity for homeless service providers to conduct surveys and other data collection, as well as connect people to services. NOHD also administers the Health Care for the Homeless Clinic, which is a Federally Qualified Health Center offering accessible and comprehensive health care services to people experiencing homelessness.
- **LHC** serves as the statewide coordinator of housing and services for people experiencing homelessness, including the administration of statewide HUD grants. LHC also serves as a pass-through for some of the federal funds that UNITY receives.

Exhibit 2 shows the entities involved in homelessness initiatives in New Orleans, the flow of funds, who they contract with, and what services they oversee.

**Exhibit 2**  
**Entities Involved with Homelessness Initiatives and Flow of Funding\***



\* This chart does not include Jefferson Parish, as our audit scope was New Orleans, specifically.  
**Source:** Prepared by legislative auditor’s staff using information from the City and UNITY.

**Funding and Services.** Between award years 2018 and 2023, HUD awarded \$252.4 million in CoC and ESG funds to the New Orleans area.<sup>6</sup> These funds include

<sup>6</sup> This figure is for the amount HUD awarded each entity, and not all funds were spent at the time of our analysis. Funds are usually spent in the year(s) after HUD’s award year.

\$210.6 million in CoC funds going to UNITY and its sub-grantees, and \$14.9 million in ESG funds going to the City and its sub-grantees.

*CoC funds can be used for eligible costs in five areas:*

1. permanent housing;
2. transitional housing;
3. supportive services only (including case management, child care, education services, employment assistance and job training, food, housing search, mental health services, etc.);
4. HMIS; and
5. homelessness prevention (in some instances).

For most CoC providers, UNITY directly receives the grant funds from HUD and then enters into sub-grantee agreements with the providers. However, some applicants, such as Volunteers of America and Catholic Charities Archdiocese of New Orleans, receive CoC grant funds directly from HUD instead of the funds passing through UNITY.<sup>7</sup>

*ESG dollars can be used for:*

1. renovation or conversion of buildings to be used as emergency shelter;
2. provision of essential services related to emergency shelter or street outreach (including supportive services);
3. maintenance, operation, insurance, utilities, and furnishings for emergency shelter;
4. rental assistance to provide short- or medium-term housing; and
5. housing relocation or stabilization services, including housing search, mediation or outreach to property owners, legal services, credit repair, utilities, etc.

In the New Orleans area, the City and Jefferson Parish receive ESG awards.<sup>8</sup> In addition, the City and UNITY use funds from other federal and local sources. Exhibit 3 shows the total HUD CoC and ESG awards for award years 2018 through 2023, and this audit report focuses primarily on the funding highlighted in yellow. Appendix C shows the awards by award recipient and year.

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<sup>7</sup> UNITY is responsible for conducting monitoring on the organizations receiving grant funds directly from HUD, in addition to its subgrantees.

<sup>8</sup> ESG are formula funds awarded annually to state governments, metropolitan cities, or urban counties, but the funds may be sub-granted to private nonprofits to provide shelter and services.

<b>Exhibit 3                      HUD Awards to New Orleans Area                      Award Years 2018 through 2023*</b>		
HUD Award	Award Recipient	Total
Continuum of Care Grants	UNITY of Greater New Orleans**	\$147,676,848
	UNITY of Greater New Orleans ( <i>passed through LHC</i> )	62,888,208
	Metropolitan Human Services District	8,427,102
	Volunteers of America	6,871,712
	City of New Orleans Office of Housing Policy and Community Development	3,627,787
	Catholic Charities Archdiocese of New Orleans	1,568,238
	Jefferson Parish Department of Community Development	1,497,408
	NAMI New Orleans	1,223,082
	<b>Total CoC</b>	<b>\$233,780,385</b>
Emergency Solutions Grants	New Orleans, LA***	\$14,939,904
	Jefferson Parish, LA***	3,674,167
	<b>Total ESG</b>	<b>\$18,614,071</b>
<b>Total Awards</b>		<b>\$252,394,456</b>

\* Funds are spent in the year(s) following the award year. Not all awarded funds had been spent at the time of our analysis.  
 \*\* CoC funds include a \$14,962,540 special CoC grant for unsheltered homelessness awarded in 2023.  
 \*\*\* ESG funds include \$8,412,333 in COVID-19 funds to Orleans Parish and \$2,349,129 to Jefferson Parish awarded in 2020.  
**Source:** Prepared by legislative auditor’s staff using information from HUD and LHC.

The objective of this audit was:

**To evaluate homelessness initiatives in New Orleans.**

Our results are summarized on the next page and discussed in detail throughout the remainder of the report. Appendix A-1a contains the City’s OCD response, Appendix A-1b contains the City’s OHSS response, Appendix A-2 contains LHC’s response, and Appendix A-3 contains UNITY’s response. Appendix B contains our scope and methodology. Appendix C contains HUD awards to the New Orleans area for award years 2018 through 2023, Appendix D contains City and UNITY expenditures by funding stream between January 2019 and June 2024, Appendix E contains expenditures for homelessness initiatives by provider between January 2019 and June 2024, and Appendix F contains the City’s encampment decommissioning process.

## Objective: To evaluate homelessness initiatives in New Orleans.

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Overall, we found that of the \$216.3 million that the City and UNITY spent, more than half went to paying long-term rent subsidies and for supportive services to unhoused individuals placed in permanent supportive housing. In order to better address homelessness, the New Orleans area Continuum of Care (CoC) should increase collaboration, communication, and data sharing among the City, UNITY, and providers. In addition, monitoring of providers, including shelters, could be improved to ensure compliance with HUD requirements and ensure provider effectiveness. Specifically, we found:

- **Between January 2019 and June 2024, the City and UNITY spent \$216.3 million on homelessness initiatives, primarily from federal funds. Of that, they spent \$122.4 million (56.6%) on permanent supportive housing programs, which provide long-term rent subsidies and supportive services for individuals experiencing homelessness who also have a disability.** Overall, UNITY expended \$178.2 million (82.4%), and the City expended \$38.1 million (17.6%). Of the \$216.3 million, \$126.4 million (58.4%) was spent by 32 providers that had agreements with either the City or UNITY for homelessness initiatives. *[See pages 9 through 15.]*
- **The City, LHC, and UNITY have processes to monitor providers; however, most fiscal and programmatic compliance monitoring was suspended during the COVID-19 pandemic.** For example, between fiscal years 2019 and 2022, OCD did not conduct any programmatic monitoring, and it did not conduct any monitoring on two (16.7%) of 12 providers between fiscal years 2019 and 2023. LHC did not conduct required monitoring between fiscal years 2020 and 2022, and it did not conduct contract monitoring of UNITY for Emergency Rental Assistance Program (ERAP) funds. UNITY did not conduct monitoring on 3 (13.6%) of 22 providers in calendar year 2019, 12 (52.2%) of 23 providers in 2020, 7 (30.4%) of 23 providers in 2021, 13 (56.5%) of 23 providers in 2022, and 14 (56.0%) of 25 providers in 2023. In addition, UNITY did not conduct monitoring of three providers over the course of three years. *[See pages 16 through 18.]*
- **The New Orleans CoC needs increased collaboration among the City, UNITY, and providers in order to develop and implement a cohesive strategic plan for addressing homelessness in New Orleans.** New Orleans does not have a current strategic plan to address homelessness; however, the City is in the process of developing a long-term strategic plan. UNITY does not have a current strategic plan and has not always conducted annual gap analyses. In

addition, better data sharing could improve planning, service delivery, and transparency. *[See pages 18 through 23.]*

- **According to OHSS and UNITY, 275 individuals have been housed through targeted encampment decommissioning. Overall, OHSS's process for decommissioning encampments generally followed city ordinances and best practices.** Between September 2023 and December 2024, OHSS decommissioned eight (57.1%) of the 14 encampments originally identified<sup>9</sup> and completed rehousing efforts on the remaining six encampment sites. As of December 2024, UNITY spent \$2.3 million (15.4%) of the \$15.0 million three-year special HUD grant available, in part, for addressing encampments. In addition, various external circumstances impacted OHSS's progress. *[See pages 24 through 31.]*
- **The City is not providing adequate oversight of shelters to ensure that shelters are following minimum health and safety standards, especially given the vulnerability of the population residing in shelters.** While the City has a process to conduct fiscal and programmatic monitoring of the shelters it funds, it does not regularly inspect these shelters to ensure they are meeting HUD's habitability standards. Despite ongoing maintenance and sanitary issues at the City's low barrier shelter, the City conducted minimal monitoring of the facility. *[See pages 31 through 35.]*
- **Family coordinated entry for shelters is not always accessible for families in need, because it is not always easy for them to contact UNITY.** In addition, UNITY did not always conduct annual evaluations and surveys of coordinated entry as required by HUD and UNITY's policy. *[See pages 35 through 38.]*
- **Providers we surveyed indicated that the City and UNITY need to improve communication, including better availability and responsiveness to providers, clarity regarding policies and procedures, and more timely reimbursements.** In addition, information about available resources is difficult to find and may be out of date. *[See pages 38 through 41.]*
- **New Orleans faces multiple challenges to effectively address homelessness. Lack of affordable housing, as well as the need for living wage employment opportunities, is a primary driver of homelessness.** Other challenges New Orleans faces to effectively address homelessness include behavioral health and substance use needs, transportation, funding, and staffing levels. *[See pages 41 through 45.]*

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<sup>9</sup> OHSS's targeted decommissioning includes established encampments of three or more people. Because encampments may appear at new locations at any time, additional encampments may be identified for decommissioning later.

Our findings and our recommendations are discussed in more detail in the sections below.

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**Between January 2019 and June 2024, the City and UNITY spent<sup>10</sup> \$216.3 million on homelessness initiatives, primarily from federal funds. Of that, they spent \$122.4 million (56.6%) on permanent supportive housing programs, which provide long-term rent subsidies and supportive services for individuals experiencing homelessness who also have a disability.**

Funding to address homelessness in Louisiana primarily comes through federal grants. In addition, during our scope, there was an influx of federal funding due to the COVID-19 pandemic.

**Between January 2019 and June 2024, the City and UNITY spent \$216.3 million on homelessness initiatives, primarily from federal funds.<sup>11</sup> Of that, UNITY expended \$178.2 million (82.4%), and the City expended \$38.1 million (17.6%).** UNITY and its sub-grantees spent the majority of their funds on housing programs, and most of their funds are from CoC grants. The City spent the majority of its funds on shelters. In addition, the City created OHSS in 2023 to better address the needs of individuals experiencing homelessness in New Orleans. Its annual budget for 2024 was approximately \$7.0 million, which includes salaries, operating expenses, and consultant costs. The New Orleans Health Department (NOHD) does not have a dedicated budget for homelessness initiatives.<sup>12</sup> NOHD staff estimated that NOHD spends between \$60,000 and \$70,000 per year on encampment cleanings, which is separate from OHSS's decommissioning of encampments.<sup>13</sup> Exhibit 4 summarizes the amount of federal and local funds spent by the City and UNITY between January 2019 and June 2024. Appendix D summarizes expenditure amounts by funding stream for homelessness initiatives between January 2019 and June 2024.

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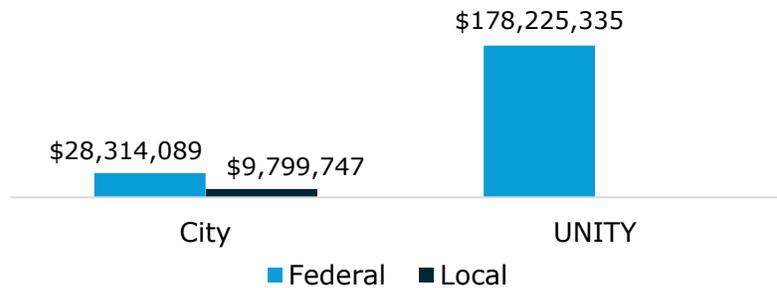
<sup>10</sup> Expenditures do not include ESG funds spent by Jefferson Parish and CoC providers that receive funding directly from HUD.

<sup>11</sup> This does not include all funding streams from the City or UNITY that may address homelessness (e.g., private donations and other federal funds).

<sup>12</sup> NOHD also administers the Health Care for the Homeless clinic that provides medical care for unhoused individuals. It is 100.0% federally funded.

<sup>13</sup> Encampment cleanings are routine cleanings that remove items causing public risk.

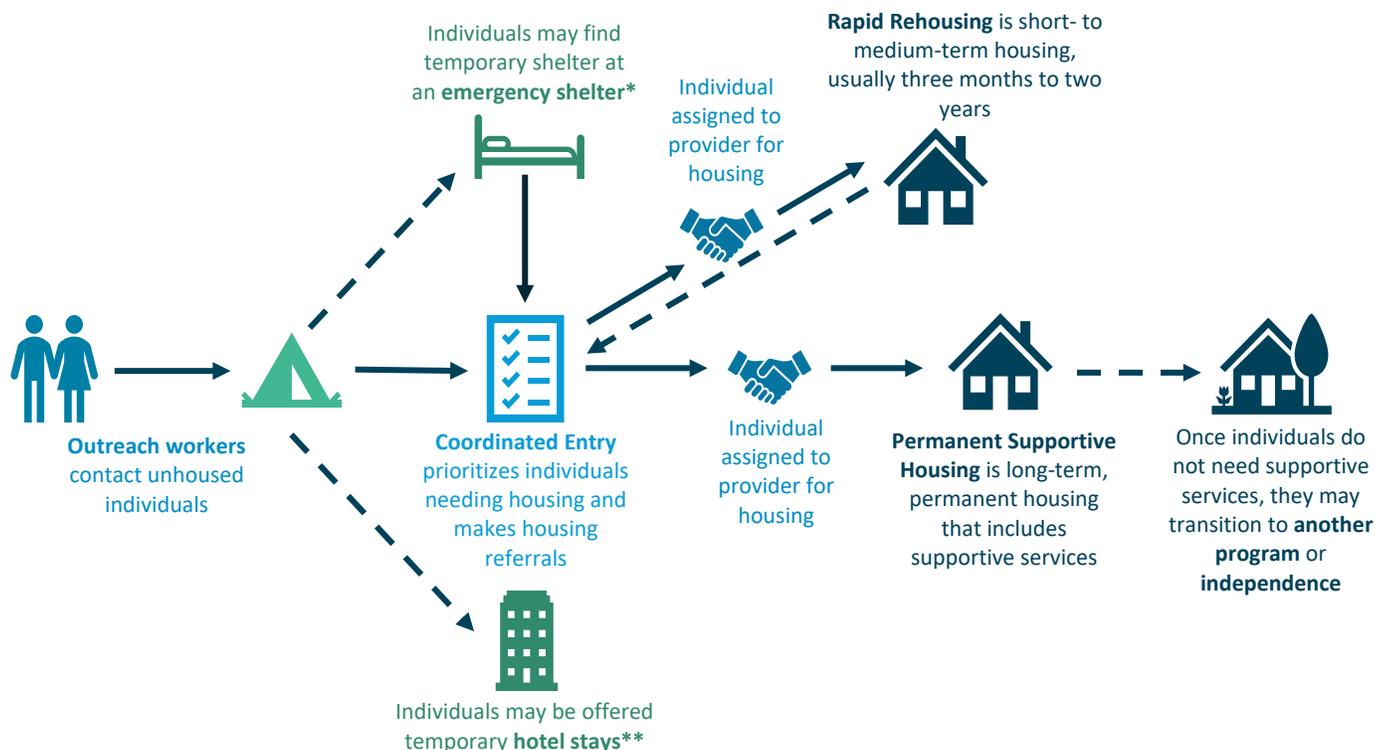
**Exhibit 4  
Federal and Local Expenditures  
January 2019 through June 2024**



**Source:** Prepared by legislative auditor's staff using information provided by the City and UNITY.

**Between January 2019 and June 2024, \$122.4 million (56.6%) was spent on permanent supportive housing programs, which provide long-term rent subsidies and supportive services for individuals experiencing homelessness who also have a disability, \$30.4 million (14.1%) on rapid rehousing, and \$21.8 million (10.1%) on shelters.** A variety of programs and activities assist providers in delivering services to individuals experiencing homelessness, including housing assistance, shelter, supportive services, and street outreach, as well as coordinated entry, which is a centralized intake process managed by UNITY that prioritizes individuals for housing programs based on vulnerability. Outreach workers connect individuals to a shelter and/or begin the coordinated entry process, which may include gathering required documents and conducting a vulnerability assessment. Shelter staff can also refer shelter residents to coordinated entry for housing. Once an appropriate slot opens, UNITY assigns the individual to the provider for that housing program. Exhibit 5 gives an overview of how providers assist unhoused individuals obtain emergency shelter and/or housing.

### Exhibit 5 Overview of How Providers Assist Unhoused Individuals Obtain Emergency Shelter and/or Housing



\* The process for families to obtain shelter is different, as UNITY requires family shelters to only accept families referred through the coordinated entry process in order to be eligible for permanent housing resources.

\*\* Hotel stays are more commonly offered to families, and during the COVID-19 pandemic unhoused individuals were offered hotel rooms as a safer alternative to traditional shelters or remaining unsheltered.

**Source:** Prepared by legislative auditor’s staff using information from UNITY and other stakeholders.

Exhibit 6 shows the amounts that the City and UNITY spent on homelessness initiatives<sup>14</sup> between January 2019 and June 2024. Provider grants and contracts through the City, LHC, and UNITY are reimbursement-based.

<sup>14</sup> This is not a comprehensive listing of all funds and programs addressing homelessness in the New Orleans area. Funding passing through LHC is represented in UNITY’s expenditures.

**Exhibit 6**  
**City and UNITY Homelessness Expenditures\***  
**January 2019 through June 2024**

<b>Program</b>	<b>Description</b>	<b>Total</b>	<b>Percent</b>	<b>Average Slots/ Beds Per Night**</b>
Permanent Supportive Housing	Permanent housing in which supportive services are provided to assist people experiencing homelessness with a disability to live independently. The majority of these funds are maintaining long-term housing for individuals currently in a program; therefore, slots may not always be available for unhoused individuals.	\$122,370,522	56.6%	2,322
Rapid Rehousing	Short-term (up to three months) and/or medium-term (for three to 24 months) tenant-based rental assistance to help individuals experiencing homelessness with or without a disability move as quickly as possible into permanent housing and achieve stability in that housing.	30,441,010	14.1%	738
Shelter	Any facility with a primary purpose of providing temporary shelter for people experiencing homelessness in general or for specific populations, and which does not require occupants to sign leases or occupancy agreements.	21,758,988	10.1%	454
Other housing	<p>Transitional housing, which facilitates the movement of individuals experiencing homelessness into permanent housing within 24 months.</p> <p>Safe haven, which serves hard-to-reach unsheltered persons with severe mental illness that have not participated in supportive services and provides 24-hour residence for an unspecified period.</p> <p>Joint transitional and rapid rehousing programs, which allow program participants to choose the type of housing that best fits their needs.</p> <p>Emergency housing vouchers, which are permanent housing vouchers created by the American Rescue Plan Act (ARPA). Participants can choose where to live, the voucher travels with the participant, participants only pay a portion of the rent, and the voucher is of unlimited duration.</p>	12,090,457	5.6%	199

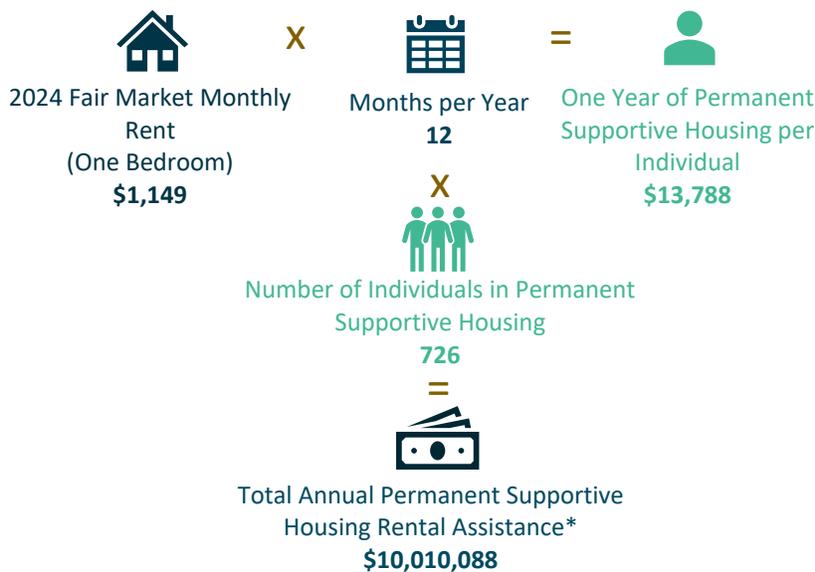
Homelessness Initiatives in New Orleans

Program	Description	Total	Percent	Slots/ Beds Per Year**
Supportive Services***	ESG-funded supportive services, which include outreach activities, eviction prevention, and mortgage foreclosure assistance.  Projects for Assistance in Transition from Homelessness (PATH), which funds services for people with serious mental illness experiencing homelessness. Services include outreach, community mental health, substance use disorders, referrals for health care, job training, educational services, and housing.	\$9,922,721	4.6%	n/a
COVID-19 Non-Congregate Shelter	During the COVID-19 pandemic, individuals experiencing homelessness were placed in hotels to protect them from the pandemic. Funds were also used for vaccinations, meals, case management, security at each location, and other supplies.	5,699,324	2.6%	n/a
Coordinated Entry	Centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals.	5,512,329	2.5%	n/a
Planning	Awarded to UNITY as the collaborative applicant for activities such as: development of strategies for ending homelessness, evaluating project outcomes, submission of the CoC application to HUD, and conducting the Point-in-Time count.	3,377,325	1.6%	n/a
HMIS	A local information technology system mandated by HUD to be used to collect client-level data and data on the provision of housing and services to individuals experiencing or at risk of homelessness.	2,465,534	1.1%	n/a
OHSS	City department created in February 2023 to connect individuals experiencing homelessness to needed services to obtain housing and self-sufficiency. Funds primarily went towards salaries, operating expenses, and consultant costs.	1,683,948	0.8%	n/a
Street Outreach	Services related to reaching out to all unsheltered individuals and families experiencing homelessness within the CoC's geographic area. Services include connection to shelter, housing, critical/crisis services, and urgent, non-facility-based care.	1,017,013	0.5%	n/a
<b>Total</b>		<b>\$216,339,171</b>	<b>100.0%</b>	

\* These expenditures are not comprehensive of *all* funding for homelessness in the City.  
 \*\* According to HUD's Housing Inventory Count (HIC), which is self-reported by providers based on availability on a single night in January and is not verified by HUD. These numbers are the average per night count for January 2019 through January 2024. It is not a count of the number of individuals served by each program. In addition, the number of slots does not include all slots/beds that exist in the City. Additional slots/beds may be funded by other organizations with direct HUD agreements or through other sources, such as private funds.  
 \*\*\* Does not include supportive services provided as part of permanent supportive housing.  
**Source:** Prepared by legislative auditor's staff using information from the City, UNITY, and HUD.

The majority of homelessness initiative funding goes to permanent supportive housing, primarily because these funds are keeping individuals housed, and individuals can continue receiving permanent supportive housing as long as they are eligible. If an individual is able to maintain housing without supportive services, they may be moved to another housing program or be able to live without assistance, which then frees up a permanent supportive housing slot. As a result, there may not always be slots available for unhoused individuals. For example, UNITY funds permanent supportive housing programs<sup>15</sup> in New Orleans, which make up \$122.4 million (68.9%) of UNITY’s \$178.2 million in expenditures during January 2019 through June 2024. In addition, the 2024 fair market rent in New Orleans was \$1,149 per month for a one-bedroom unit,<sup>16</sup> meaning it would cost \$13,788 to house one person for a year. The hypothetical cost of permanent supportive housing rental assistance for 726 individuals, for a one-bedroom based on the 2024 fair market rate, would cost approximately \$10 million per year. In addition, providers also spend permanent supportive housing dollars on supportive services, which recipients need in order to maintain housing. Exhibit 7 shows the hypothetical costs for permanent supportive housing rental assistance based on the 2024 fair market rent for a one-bedroom.

**Exhibit 7**  
**Example of Hypothetical Cost of Permanent Supportive Housing**  
**Rental Assistance in New Orleans**



\* Permanent supportive housing also includes supportive services, which are not included in this calculation. In addition, HUD does not always reimburse for the full fair market rent rate.

**Source:** Prepared by legislative auditor’s staff using information from HUD.

<sup>15</sup> From HUD CoC awards and CoC funds passed through LHC.

<sup>16</sup> HUD 2024 Fair Market Rent rate for a one-bedroom unit.

**Thirty-two providers had agreements with either the City or UNITY for these homelessness initiatives between January 2019 through June 2024, totaling \$126.4 million.** The City uses ESG and other federal and local funds for agreements with providers for shelters and supportive services, such as legal assistance. Using CoC funds, UNITY has agreements for housing programs, including permanent supportive housing and rapid rehousing, HMIS services, street outreach, and supportive services. Exhibit 8 shows the providers with the top 10 highest expenditures from January 2019 through June 2024. Appendix E shows expenditures and types of service for entities receiving funds from the City and/or UNITY.

<b>Exhibit 8 Providers with Top 10 Highest Expenditure Totals January 2019 through June 2024</b>				
<b>Provider</b>	<b>Types of Services Provided</b>	<b>Funding Type</b>	<b>Total Expenditures</b>	<b>Percent of All Provider Expenditures</b>
Start Corporation	Shelter (low barrier shelter),* permanent supportive housing, rapid rehousing, safe haven, coordinated entry, joint transitional housing-rapid rehousing	CoC, ESG	\$32,859,827	26.0%
New Orleans Family Justice Center	Shelter (domestic violence), rapid rehousing, joint transitional housing-rapid rehousing, coordinated entry	CoC, ESG	\$12,787,972	10.1%
Ozanam Inn	Shelter, permanent supportive housing, rapid rehousing, coordinated entry	CoC, ESG	\$9,327,560	7.4%
Responsibility House	Permanent supportive housing, coordinated entry	CoC	\$9,322,816	7.4%
NO/AIDS Taskforce	Permanent supportive housing	CoC	\$8,966,678	7.1%
Travelers Aid Society	Shelter (day shelter), permanent supportive housing, rapid rehousing, coordinated entry, street outreach	CoC, ESG	\$8,399,001	6.6%
Southeast Louisiana Legal Services	Supportive services	ESG	\$5,149,352	4.1%
Covenant House	Shelter (youth), permanent supportive housing, rapid rehousing, coordinated entry	CoC, ESG	\$4,927,250	3.9%
Odyssey House	Permanent supportive housing	CoC	\$4,297,899	3.4%
NAMI New Orleans	Permanent supportive housing, safe haven	CoC	\$3,833,149	3.0%
* As of June 2024, Odyssey House operates the City's low barrier shelter.				
<b>Source:</b> Prepared by legislative auditor's staff using information provided by the City and UNITY.				

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**The City, LHC, and UNITY have processes to monitor providers; however, most fiscal and programmatic compliance monitoring was suspended during the COVID-19 pandemic.**

The City, LHC, and UNITY monitor providers in several ways, including reviewing invoices before issuing reimbursements, contract management, and annual fiscal and programmatic compliance monitoring. In addition, UNITY reviews quarterly and annual performance reports submitted by CoC providers. Federal regulations<sup>17</sup> state that part of the responsibility of the CoC is to monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers, and that CoC grant recipients should monitor subrecipients at least annually. In addition, federal regulations<sup>18</sup> state that federal award recipients and subrecipients are responsible for the oversight of the award, and recipients must monitor subrecipients' activities to ensure they comply with all requirements and meet performance expectations. We reviewed the City's, LHC's, and UNITY's monitoring processes and resulting findings and concerns.

**The City, LHC, and UNITY have processes to monitor providers; however, most fiscal and programmatic compliance monitoring was suspended during the COVID-19 pandemic.** OCD conducts fiscal and programmatic monitoring of providers, most of which are sub-grantees of ESG funds and are primarily shelters. According to OCD and its ESG policies and procedures, its goal is to conduct monitoring of each contract annually, and it uses a risk assessment to guide its reviews. However, of the 12 providers OCD had contracts with, it conducted five fiscal monitoring reviews in fiscal year 2019, one in fiscal year 2020, none in 2021, two in 2022, and five in 2023. Between fiscal years 2019 and 2022, it did not conduct any

programmatic monitoring. Instead, it conducted programmatic monitoring for three years of programs at once in 2023, even though some of these contracts had been expired for more than two years. For two (16.7%) of the 12 providers, OCD did not conduct any fiscal or programmatic monitoring between fiscal years 2019 and 2023. Out of 34 reviews, OCD identified five observations or findings, including insufficient policies and procedures, timesheets not reflecting a seven-day workweek, and the general ledger needing updating.

LHC acts as a pass-through for some funds going to UNITY, including the Louisiana Permanent Supportive Housing Initiative (LAPSHI), ESG COVID-19 funds, and Emergency Rental Assistance Program (ERAP) funds. According to LHC, it conducts monitoring of LAPSHI annually. LHC conducted monitoring of the LAPSHI

**Fiscal compliance monitoring** includes evaluating providers' invoices, financial transactions, match documentation, and fiscal policies and procedures.

**Programmatic compliance monitoring** includes evaluating providers' performance, policies and procedures and whether requirements were met. These reviews include testing client files for compliance, including eligibility, intake, and confidentiality.

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<sup>17</sup> 24 CFR § 578.7, 578.23

<sup>18</sup> 2 CFR § 200.329

program in fiscal years 2019, 2023, and 2024; however, it did not conduct monitoring between fiscal years 2020 and 2022. LHC's LAPSHI monitoring results found that UNITY needed to improve documentation regarding eligibility, disabilities, household information, and other files. For example, LHC identified client file deficiencies including incorrect or missing eligibility and rent reasonableness documentation, as well as other needed documentation being incomplete. In addition, in February 2023, the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) contracted with UNITY for ERAP funds with LHC as the contract monitor. According to LHC staff, it did not conduct contract monitoring for this contract other than reviewing UNITY invoices. According to the contract, LHC should have evaluated UNITY's performance against criteria laid out in the contract, such as providing timely, accurate, and complete reporting; submission of accurate draw requests timely; and documenting all clients assisted in HMIS.

UNITY conducts fiscal and programmatic compliance monitoring of providers that are sub-grantees of CoC awards and other federal funds. According to UNITY's *CoC Monitoring Handbook*, each provider should be monitored at least annually. UNITY uses a risk assessment to determine the type of monitoring and whether more frequent monitoring is needed. Providers also submit quarterly performance reports to UNITY, as well as an annual performance report to HUD. According to UNITY staff, the COVID-19 pandemic limited their ability to conduct monitoring reviews. For example, UNITY did not conduct monitoring on 3 (13.6%) of 22 providers in calendar year 2019, 12 (52.2%) of 23 providers in 2020, 7 (30.4%) of 23 providers in 2021, 13 (56.5%) of 23 providers in 2022, and 14 (56.0%) of 25 providers in 2023. In addition, UNITY did not conduct monitoring of three providers over the course of three years. Of the 64 reviews with concerns and/or findings, there were a total of 144 concerns and findings. The most common findings and concerns UNITY identified in monitoring reviews included deficiencies with client files, including missing eligibility documentation, necessary forms missing, or files missing altogether. In addition, UNITY identified issues with policies and procedures, service delivery, and administration, as well as fiscal deficiencies.

**Recommendation 1:** As OCD has resumed program monitoring, it should conduct all reviews required by its policies and procedures, including reviewing each provider annually.

**Summary of OCD Management's Response:** OCD agreed with this recommendation and stated that it has resumed its programmatic monitoring and is in the process of finalizing its programmatic monitoring for all City funded providers. See Appendix A-1a for management's full response.

**Recommendation 2:** As LHC has resumed program monitoring, it should conduct all reviews required by its policies and procedures.

**Summary of LHC Management's Response:** LHC agreed with this recommendation and stated that it has resumed its program monitoring of

the Louisiana Permanent Supportive Housing Initiative post COVID-19. See Appendix A-2 for management's full response.

**Recommendation 3:** As UNITY has resumed program monitoring, it should conduct all reviews required by its policies and procedures, including reviewing each provider at least annually.

**Summary of UNITY Management's Response:** UNITY agreed with this recommendation and stated that UNITY staff spend substantial time every day ensuring that CoC agencies are performing well and following the law. See Appendix A-3 for management's full response.

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### **The New Orleans CoC needs increased collaboration among the City, UNITY, and providers in order to develop and implement a cohesive strategic plan for addressing homelessness in New Orleans.**

According to HUD regulations,<sup>19</sup> two primary purposes of the CoC program are to promote community-wide commitment to the goal of ending homelessness and to promote access to and effective use of mainstream programs by unhoused individuals and families. The U.S. Interagency Council on Homelessness federal strategic plan<sup>20</sup> notes that interdisciplinary, interagency, and intergovernmental action is required to effectively create comprehensive responses to the complex problem of homelessness.

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<sup>19</sup> 24 CFR § 578.1

<sup>20</sup> ["All In: The Federal Strategic Plan to Prevent and End Homelessness,"](#) December 2022

**The New Orleans CoC needs increased collaboration among the City, UNITY, and providers in order to develop and implement a cohesive plan for addressing homelessness in the New Orleans area.** According to multiple stakeholders, the CoC would benefit from more collaboration and clearer strategies. The results of our provider survey regarding overall CoC coordination were mixed. While 12 (60.0%) of 20 respondents rated CoC coordination effectiveness as “very effective” or “somewhat effective,” individual survey comments indicated frustration with how the CoC operates (*see text box to the right*). Providers were positive about weekly and/or monthly meetings with UNITY and other providers; however, they do not always feel like their feedback is taken into consideration.

**New Orleans does not have a current strategic plan to address homelessness; however, the City is in the process of developing a long-term strategic plan.** Formal strategic plans are an important step in creating a cohesive vision and actionable steps. The City, UNITY, and other stakeholders often have differing or competing philosophies and priorities, which can create challenges to working cohesively toward unified goals. For example, focusing on individuals in encampments for housing (i.e., by location) differs from UNITY’s processes that prioritize individuals for housing based on vulnerability. Working together to create a comprehensive, formalized plan could help the various entities involved develop clear strategies, action steps, responsibilities, and measurable goals to more effectively address homelessness. For example, in 2011, the City created a 10-year plan to end homelessness in conjunction with UNITY and other stakeholders. The plan’s goals included ending veteran homelessness within five years, ending chronic homelessness within 10 years, and ending family homelessness within 10 years. Veteran homelessness in New Orleans reached functional zero in 2015.<sup>21</sup> We also identified several metropolitan CoCs that had current strategic plans, including Atlanta, Georgia; Houston, Texas; and Nashville, Tennessee. In addition, according to UNITY, the City, State, and UNITY worked successfully together during the COVID-19 pandemic to rapidly house unsheltered individuals in hotels to protect them from the pandemic, as well as provide vaccinations, meals, case management, security at each location, and other supplies.

While the City and UNITY both conduct planning activities, neither have a current, comprehensive long-term strategic plan:

“Not everyone is coordinating at the same time or for same purpose.”

“The City could do a better job at communicating and coordinating its goals with all of the partner agencies in the continuum and not just the few that they are working with. In order for the city’s initiatives to work, it will require the work of all of the participating agencies in the continuum.”

“UNITY should incorporate more ideas and suggestions from partner agencies. Often times decisions are made at the management level and then are presented to the CoC in a way that doesn’t lend to much discussion and inclusion of other members’ ideas.”

**Source:** 2024 LLA Homelessness Initiatives and Services Survey

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<sup>21</sup> “Functional zero” in this instance means providing permanent housing to all veterans found living on the streets or in shelters who would accept housing.

- *The City is in the process of developing a long-term strategic plan to address homelessness.* In response to the City's goal to end homelessness/house 1,500 individuals by the end of calendar year 2025, OHSS led the development of the Home for Good initiative, which is a public and private sector initiative that aims to reach low or no unsheltered homelessness in New Orleans by the end of calendar year 2025. This initiative includes three core pathways to housing: (1) targeted encampment decommissioning, (2) coordinated housing navigation to all other unsheltered persons, and (3) accelerated exits to housing from shelters. The City has conducted planning activities for this initiative, has an overall direction for the Home for Good initiative, and has developed plans for each encampment it has decommissioned. As part of this initiative, the City is developing a long-term strategic plan to address homelessness and anticipates the plan to be completed in March 2025.
- *UNITY does not have a current strategic plan and has not always conducted annual gap analyses.* Although HUD requires CoCs to have a plan and to conduct an annual gap analysis to identify needed services, UNITY does not have a current written CoC plan that outlines short- and long-term strategies and action items. According to HUD, determining gaps and their relative priority are fundamental steps in the CoC planning process. Then, after determining and prioritizing gaps, it is important to look at how these gaps interrelate with strategy development. In the written CoC plan, strategies should include action steps, points of accountability, and timeframes. However, UNITY does not conduct a formal, comprehensive annual gap analysis or develop an actionable, annual plan. According to UNITY, it conducts planning activities during the year as part of the annual HUD CoC award application process and creates standalone plans for various initiatives as needed. HUD scores each CoC's annual application, and on average, UNITY's CoC award applications scored 23.1 points higher than the national CoC median between 2019 and 2023.<sup>22</sup> In 2023, UNITY scored only five points below the highest-ranked CoC in the nation. In 2022, the Community Task Force, which UNITY leads, adopted a plan to reduce street homelessness. While the plan includes specific strategies, it does not include action steps with clear roles and responsibilities, timeframes, or benchmarks to determine success. According to its bylaws, the UNITY Board is responsible for reviewing, updating, and evaluating the strategic plan and annual implementation plans.

Legislation passed in the 2023 Regular Legislative Session established a statewide Louisiana Interagency Council on Homelessness (the Council) effective

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<sup>22</sup> Scores for 2020 are not included. According to HUD, there was no 2020 CoC competition due to the COVID-19 pandemic; instead, HUD renewed the 2019 awards for 2020. Scores for the 2024 award cycle are not yet available.

August 2023.<sup>23</sup> The Council held its first meeting in December 2024. As the Council begins its work on developing a statewide plan to end homelessness in Louisiana, the Council, the City, and UNITY should work together to ensure that the upcoming state plan and the New Orleans long-term strategic plan are consistent in their goals to address homelessness.

**Better data sharing could improve planning, service delivery, and transparency.** Part of the foundation of the 2022 Federal Strategic Plan to Prevent and End Homelessness<sup>24</sup> includes the recommendation to use data and evidence to make decisions. The plan states that “collection, analysis, and reporting of quality, timely qualitative and quantitative data is essential for targeting interventions, tracking results, making strategic decisions, and allocating resources at the federal, state, and local levels.” In addition, it calls for expanding community capacity to integrate HMIS data with other federal, state, and local data sources (such as Medicaid and corrections) in order to inform planning and decision making. Other state audits have found issues with data integrity and the need to use data to determine outcomes and make data-driven decisions. For example, Georgia found that, while CoCs and service providers were using HMIS to meet HUD requirements, they were not maximizing its use to improve homeless service delivery. Also, California and Utah found reliability issues with HMIS data, such as missing key data elements or inaccurate data entries, and that these states needed to improve their use of data and performance measures to monitor outcomes.

As the CoC lead agency, UNITY is responsible for the HMIS database and appointing an HMIS lead agency, which is VIA LINK, a sub-grantee of CoC funds. While HMIS data is protected by confidentiality requirements, UNITY should work with the City and other relevant partners to share data in a way that is transparent while protecting client-level personally identifying information. For example, the City and its consultant requested from UNITY access to a set of tools, called Stella, created by HUD and available for CoCs, as part of its development of a long-term strategic plan. Stella allows CoCs to (1) understand how CoC systems are performing and (2) conduct modeling to determine the size and needs of the unhoused population and determine the types and amounts of assistance that would effectively and equitably meet those needs. Initially, UNITY did not grant the City access to Stella; however, according to the City and UNITY, they are working together to allow the City some access.

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<sup>23</sup> <https://legis.la.gov/legis/ViewDocument.aspx?d=1332467>

<sup>24</sup> “All In: The Federal Strategic Plan to Prevent and End Homelessness,” December 2022

Homelessness service providers also expressed the need for improved data sharing (*see text box to the right*). Providers may have differing levels of access to HMIS based on the level UNITY deems necessary, but most providers only have access to the information their organization inputs into HMIS and basic client information (i.e., they can see if a client is already in the system). Several providers stated that having access to additional client information, such as prior services received, could help them better serve individuals. We surveyed CoCs nationwide, and 47 (88.7%) of 53 CoC respondents<sup>25</sup> appear to share more HMIS data than the New Orleans CoC about clients and the services they received across providers. In addition, while 13 (65.0%) of 20 New Orleans provider survey respondents agreed that HMIS was sufficient to meet their needs, providers stated that additional information would be helpful to deliver services. Three (15.0%) of 20 respondents noted challenges with data integrity, including information being recorded incorrectly, changes being made to data points, and data missing or showing mistakes not previously there.

“We are not able to see all shelter stays or if clients are enrolled in case management services with a provider. We must reach out to UNITY each time to find this information.”

“We would like to be able to see previous encounters at other [Coordinated Entry] sites and if clients are currently assigned to a housing navigator or case manager. We do not want to duplicate services but have very limited access and rely on clients’ word of mouth of what services they have received.”

**Source:** 2024 LLA Homelessness Initiatives and Services Survey

**Recommendation 4:** OHSS and UNITY should work more collaboratively to develop a long-term strategic plan with measurable goals.

**Summary of OHSS Management’s Response:** OHSS agreed with this recommendation and stated that it is in the final stages of creating a strategic plan with clearly defined measurable goals and outcomes developed through close collaboration with UNITY and other key partners in the Continuum of Care. See Appendix A-1b for management’s full response.

**Summary of UNITY Management’s Response:** UNITY agreed with this recommendation and stated that it agrees there is a need for more collaboration between the CoC and OHSS at a time when homelessness has become a contentious political issue. UNITY also stated that this section glosses over UNITY’s plan for reducing homelessness, which was chosen by HUD as the basis for awarding the highly competitive Unsheltered Homelessness grant. See Appendix A-3 for management’s full response.

**Recommendation 5:** OHSS should continue to develop a long-term strategic plan to address homelessness.

**Summary of OHSS Management’s Response:** OHSS agreed with this recommendation and stated that it is close to the end of the development of

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<sup>25</sup> Fifty-three respondents representing CoCs in 27 states answered this survey question.

a long-term strategic plan to address homelessness. See Appendix A-1b for management's full response.

**Recommendation 6:** UNITY should conduct annual gap analyses and create annual plans.

**Summary of UNITY Management's Response:** UNITY agreed with this recommendation and stated that it will improve its communication about the gaps analysis and planning that it conducts. UNITY stated that the section erroneously states that UNITY does not conduct these activities as they are an essential part of its annual CoC grant planning process. See Appendix A-3 for management's full response.

**Recommendation 7:** UNITY should facilitate increased data sharing among key partners, such as OHSS and some providers, to better analyze program outcomes and create long-term strategies to address homelessness.

**Summary of UNITY Management's Response:** UNITY neither agreed nor disagreed with this recommendation and stated that it provides partners with aggregate de-identified data upon request and will improve its communication of how to make such requests. UNITY also stated that this section mistakenly assumes that more sharing of client-identified information is a best practice or necessary to analyze program outcomes. See Appendix A-3 for management's full response.

**LLA Additional Comments:** Neither this section of the report nor the recommendation suggests that UNITY share client-identified data with partners. Rather, we suggest that UNITY should work with the City and other relevant partners to share data in a way that is transparent while protecting client-level personally identifying information.

**Matter for Legislative Consideration 1:** The legislature may wish to urge the Louisiana Interagency Council on Homelessness to work together with the City and UNITY to ensure that the upcoming statewide plan and the New Orleans long-term plan are consistent in their goals to end homelessness.

**According to OHSS and UNITY, 275 individuals have been housed through targeted encampment decommissioning. Overall, OHSS’s process for decommissioning encampments generally followed city ordinances and best practices. As of December 2024, UNITY spent \$2.3 million (15.4%) of the \$15.0 million three-year special HUD grant available, in part, for addressing encampments. In addition, various external circumstances impacted OHSS’s progress.**

In June 2023, OHSS began an initiative to achieve low to no unsheltered homelessness by the end of 2025. A major focus of this initiative, Home for Good, as discussed on page 20, has been decommissioning homeless encampments, in partnership with UNITY and Travelers Aid Society. An encampment is an area of public property that is being used for unauthorized camping or housing, as evidenced by one or more tents, structures, shelters, or assembly of camping equipment.<sup>26</sup> OHSS’s decommissioning efforts include 14 established encampments of three or more people. OHSS is the project lead, primarily responsible for overall strategy and planning. UNITY and Travelers Aid Society are primarily responsible for linking individuals to housing, and all three entities conduct encampment outreach activities. Between September 2023 and December 2024, OHSS decommissioned eight (57.1%) of the 14 encampments it originally identified<sup>27</sup> and had completed rehousing efforts on the remaining six encampment sites. Exhibit 9 summarizes the major phases of the City’s encampment decommissioning process, and Appendix F contains a detailed summary of these processes.

“Local decision-makers are caught between **demands for swift action** and the reality that **permanent, sustainable solutions—housing with voluntary supportive services—take time and investment to bring to scale**. With rising housing costs and limited resources, elected officials, nonprofit providers, businesses, the faith community, advocates, and people with lived experience often struggle to find **common ground and effective solutions**.”

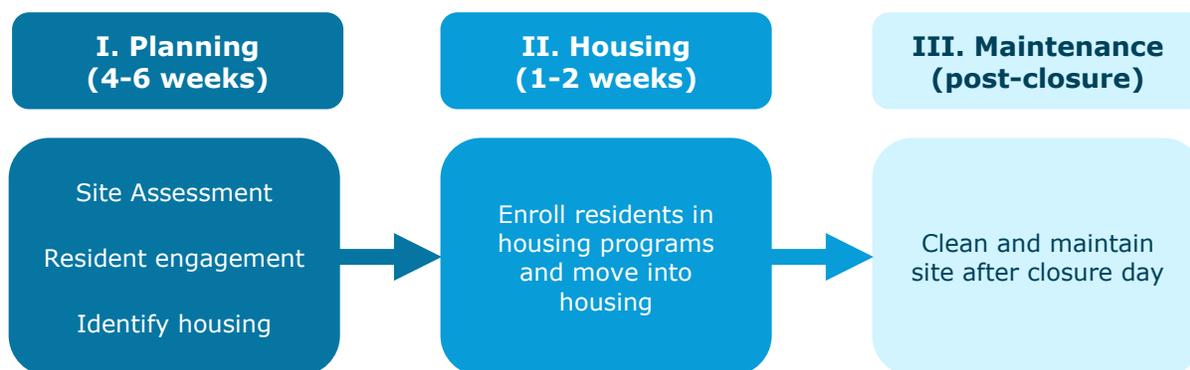
**Source:** “7 Principles for Addressing Encampments,” U.S. Interagency Council on Homelessness

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<sup>26</sup> The New Orleans Code of Ordinances, Chapter 82, Article XII, Section 82-694

<sup>27</sup> A 15<sup>th</sup> encampment site was created in October 2024 as part of a state initiative to relocate some existing encampments away from the Superdome. However, because encampments may appear at new locations at any time, additional encampments may be identified for decommissioning later.

### Exhibit 9 Encampment Decommissioning Process



**Source:** Prepared by legislative auditor's staff using information provided by OHSS.

Effectively and humanely decommissioning encampments is challenging because individuals residing in encampments may have accumulated personal belongings, developed relationships with other individuals in the encampments, or may be in close proximity to supportive services and/or their employment. If immediate housing or shelter is not available or acceptable to individuals, encampments are likely to reappear, and closing encampments without offering residents a place to go may cause further instability and trauma.<sup>28</sup> Some individuals residing in encampments may not be comfortable staying in shelters due to barriers, safety concerns, or behavioral health issues.

**The City's process for decommissioning encampments has generally followed city ordinances and best practices; however, the process could be improved through increased data sharing.** Best practices<sup>29</sup> include developing a multi-sector response to encampments, ensuring access to shelter or housing, and creating a plan for sites following closure. While the City's encampment decommissioning process appears consistent with most best practices, the Home for Good initiative is not following best practices regarding the collection, tracking, and sharing of data related to encampments. The City,<sup>30</sup> Travelers Aid Society, and UNITY created a memorandum of understanding (MOU) in August 2023 to cooperate in a joint effort for encampment housing in New Orleans, including sharing data and reports containing client information. However, as mentioned on page 21, a lack of data sharing has impacted overall transparency and determining outcomes for those housed.

<sup>28</sup> ["7 Principles for Addressing Encampments," U.S. Interagency Council on Homelessness \(USICH\), June 2022](#)

<sup>29</sup> ["7 Principles for Addressing Encampments," U.S. Interagency Council on Homelessness \(USICH\), June 2022;](#) ["19 Strategies for Communities to Address Encampments Humanely and Effectively," USICH, April 2024.](#)

<sup>30</sup> Via the City's contract with Clutch Consulting Group.

According to OHSS's Home for Good dashboard,<sup>31</sup> 275 individuals have been housed through targeted encampment decommissioning as of December 2024.<sup>32</sup> OHSS tracks the number of people identified at each encampment, the number who do not engage in the housing process, and the number referred to UNITY for housing for each encampment, but according to OHSS, it cannot track individuals through the housing process in HMIS. According to UNITY, OHSS receives a monthly report from VIA LINK, the CoC's HMIS administrator, containing aggregate data on the Home for Good initiative, and OHSS can request additional information be added to this report.

The New Orleans Code of Ordinances<sup>33</sup> establishes rules and procedures for the remediation of encampments located on public property, including notifying encampment residents of the dates of remediation efforts, rules for storing personal property removed from encampment locations, and reporting requirements. While OHSS did not systematically document its compliance with the ordinance, the encampment decommissioning process appears to have followed most of these requirements. For example, OHSS's process includes posting closure notices one week, 72 hours, and 24 hours prior to encampment closures, including some signage in English, Spanish, and Vietnamese. OHSS stated that outreach staff also gave multiple verbal notices at encampment sites, and were able to manage residents with limited English proficiency or limited literacy individually. In addition, notices informed residents of how they could claim their personal property if it was collected by the City. OHSS said that it has a process in place for cataloging the personal property it collects, but very little personal property has been stored. According to OHSS, the goal is to complete outreach before the official encampment closure date.

**The City does not have formal policies to govern the process for decommissioning encampments.** OHSS has site-specific plans that include establishing the roles and responsibilities of each partner, creating a timeline for the various steps of decommissioning, and evaluating available resources. However, OHSS has not developed formal policies to govern the encampment decommissioning process. Formal policies could help to ensure that decommissioning efforts support long-term strategic goals and meet best practices, as well as create protocols for handling challenges and maintaining consistency. For example, during the decommissioning of the first encampment (Tchoupitoulas) tensions arose between the partners because the posted closure notices included penalties for trespassing.<sup>34</sup> Having defined policies may have helped to alleviate tensions by establishing the verbiage to be used on closure notices.

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<sup>31</sup> <https://homeforgoodneworleans.org/>

<sup>32</sup> According to the OHSS dashboard, 822 total individuals were housed across all three Home for Good pathways to housing as of December 2024.

<sup>33</sup> Chapter 82, Article XII, Section 82-694

<sup>34</sup> The Tchoupitoulas encampment site had been purchased by a developer and converted to private property.

**As of December 2024, UNITY had spent<sup>35</sup> \$2.3 million (15.4%) of the \$15.0 million three-year special HUD grant available, in part, for addressing encampments.** Funding for housing individuals in encampments came from a variety of sources: ERAP funding from GOHSEP and LHC, a special HUD grant focusing on unsheltered homelessness, and ARPA funding flowing through the City, as well as resources from existing CoC programs, City OHSS funds, and in-kind donations.<sup>36</sup> The primary mechanism to house individuals in encampments is through UNITY's housing process. According to the City, UNITY used all of its ERAP budget by May 2024. According to UNITY, it was then waiting on approval for budget revisions in order to use additional funds for rental assistance. HUD awarded UNITY a \$15 million, three-year special grant to address unsheltered homelessness that was available in January 2024.<sup>37</sup> As of December 2024, UNITY and its subrecipients had spent \$2.3 million (15.4%) of the grant. In its application for this special funding, UNITY stated that it could house 430 people in permanent supportive housing or rapid rehousing in the first year of grant funding. According to UNITY, it has housed 50 individuals<sup>38</sup> from OHSS's targeted encampments with this special funding as of December 2024. However, additional individuals initially housed through other rapid rehousing programs will be transitioned to permanent supportive housing through the special grant. In addition, housing individuals with the special HUD funds also relied on securing public housing vouchers, which is time consuming. Exhibit 10 shows the number of individuals housed from prioritized encampments by funding source as of December 2024, as provided by UNITY, with the special grant programs highlighted in green.

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<sup>35</sup> According to UNITY, this represents the dollars they spent and that were reimbursed by HUD as of October 2024. UNITY stated that it has incurred additional expenditures not yet reimbursed.

<sup>36</sup> OHSS created a "Flex Fund" of private donations and ARPA funds in order to provide services that HUD funding cannot be used for (e.g., furniture, landlord incentives, etc.). In addition, health care providers committed an additional \$14 million in the form of medical care and mental health services to newly housed individuals.

<sup>37</sup> This grant was awarded in April 2023, and not all of the \$15 million is designated specifically for encampment housing.

<sup>38</sup> According to unaudited information provided by UNITY. This does not include individuals housed from other encampments, or other sheltered or unsheltered individuals.

<b>Exhibit 10</b>	
<b>Individuals* Housed by UNITY from Prioritized Encampments As of December 2024</b>	
<b>Funding Source</b>	<b>Housed from Prioritized Encampments</b>
CoC Permanent Supportive Housing (PSH)	14
CoC PSH - Special HUD Grant	4
CoC PSH - via LHC	9
CoC Rapid Rehousing (RRH) - Special HUD Grant	4
CoC RRH	21
Emergency Rental Assistance Program RRH	117
City American Rescue Plan Act RRH	62
CoC PSH - Special HUD Grant with LHC Vouchers	42
Other Funding Sources	2
<b>Total</b>	<b>275</b>
* These figures only include individuals from OHSS's list of prioritized encampments. According to OHSS, 822 total individuals have been housed through its Home for Good initiative as of December 2024. <b>Source:</b> Unaudited data provided by UNITY.	

According to UNITY, while funds were available in January 2024, it takes time for providers to start the programs, including hiring staff. Exhibit 11 shows the projects awarded through HUD's special grant, which organizations received funds, how much was awarded, and how much was spent as of December 2024.

<b>Exhibit 11</b>				
<b>Spending Levels* for HUD Special Funding for Unsheltered Homelessness January 1, 2024, through December 31, 2024</b>				
<b>Project</b>	<b>Spending Organizations</b>	<b>Total Awarded</b>	<b>Amount Spent*</b>	<b>Percent Spent</b>
Expanding Street Outreach	Jefferson Parish Human Services District, Travelers Aid Society	\$434,700	\$98,047	22.6%
Services in Permanent Housing	NAMI New Orleans, Start Corporation	4,356,441	872,775	20.0%
Permanent Supportive Housing for People Experiencing Unsheltered Homelessness	Travelers Aid Society, Volunteers of America	4,769,982	824,796	17.3%
Unsheltered Joint Component	UNITY, Easter Seals	4,431,970	514,667	11.6%
Reducing Unsheltered Homelessness RRH	Jefferson Parish Department of Community Development	948,153	0	0.0%
Improving Access to Shelter	Ozanam Inn	21,294	0	0.0%
<b>Total</b>		<b>\$14,962,540</b>	<b>\$2,310,285</b>	<b>15.4%</b>
* Expenditures represent only the amount that HUD has reimbursed as of December 2024. Additional funds may have been expended but not yet reimbursed. <b>Source:</b> Prepared by legislative auditor's staff using information provided by UNITY.				

In August 2024, the City contracted with UNITY for \$1.25 million in ARPA funds to provide rapid rehousing to individuals in encampments, and UNITY began spending the funds in September 2024. The contract was amended in December 2024 for an additional \$1.25 million. According to the City, delays in getting the contract signed contributed to a slowdown in encampment progress during summer 2024. According to the City, UNITY was slow in providing financial documentation necessary to complete the contract. According to UNITY, staff needed training on the federal grant requirements applicable to ARPA prior to drawing down the funds, which was time-consuming, and an advance of funds was needed as a safeguard because of the City's history of untimely payments.<sup>39</sup> UNITY also stated that they asked the City for draft contracts that were not provided timely. The contract negotiations included an initial \$500,000 advance, which was not a common practice by the City at that time; however, the finalized contract included a \$250,000 advance.

**Various external circumstances have created obstacles and delays for the City's plans to decommission encampments.** According to the City, encampments are prioritized for decommissioning based on public health and safety concerns. Because of this, the order of encampment decommissioning has been subject to change throughout the initiative as data are updated. For example, if NOHD were to discover a major public health issue at an encampment, it may be reprioritized higher on the list.<sup>40</sup> However, the City also had to adjust its plans due to several external pressures, including developers wanting to clear areas being converted to private property, unexpected NOPD sweeps of the abandoned Bywater Naval Base and in the French Quarter, and pressure from the state to clear encampments ahead of the Taylor Swift concerts in October 2024 and Super Bowl LIX in February 2025. In October 2024, the Governor's Office activated Troop NOLA to clear and relocate approximately 75 people from an encampment near the Superdome. A group of unhoused people filed a lawsuit in response to the sweep, which led to a temporary restraining order after the relocation had begun.<sup>41</sup>

According to both the City and UNITY, the state's decisions were disruptive to progress as housing engagement had already begun at the encampment sites, and the unhoused population may no longer trust the process. Both partners stated that the unhoused individuals were scattered as a result of the sweep and are now difficult to locate in order to continue the housing process.

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<sup>39</sup> In August 2024, LLA issued an audit detailing issues with the [timeliness of vendor payments in the City of New Orleans](#).

<sup>40</sup> The City requested that the full list of encampment locations and their prioritization not be published in our report. According to OHSS, publicly identifying which encampment sites will be decommissioned next may cause an influx of people experiencing homelessness to move to that location and put additional strain on the process.

<sup>41</sup> In November 2024, the Governor's Office ordered the sweep to be completed ahead of the Bayou Classic football game at the Superdome. This order was blocked by a second restraining order. In December 2024, a judge indefinitely prohibited the Louisiana State Police from conducting sweeps on encampments in New Orleans without issuing adequate notice. See green box for additional information.

### **Additional Encampment Developments After Audit Scope Concluded**

Between the conclusion of our audit scope in December 2024 and the publication of this report, additional events impacted OHSS's Home for Good initiative and its partnership with UNITY to house individuals from encampments. In January 2025, the State Supreme Court overturned the December 2024 ruling that the state had to give at least 24 hours' notice to clear encampment sites. Pursuant to this ruling and the governor's executive order following the Bourbon Street attack on January 1, 2025, the state provided emergency funding to open a temporary shelter and relocate individuals from encampments ahead of Super Bowl LIX and Mardi Gras. According to OHSS, all remaining encampments it had originally identified for decommissioning were closed as part of the state's initiative, but OHSS said it completed its rehousing activities at these sites. OHSS also said it plans to continue with closure maintenance plans for these sites.

**Recommendation 8:** OHSS and UNITY should develop a data sharing agreement that increases transparency and allows for determining overall outcomes from the encampment decommissioning process.

**Summary of OHSS Management's Response:** OHSS agreed with this recommendation and stated that it is actively pursuing a more comprehensive data-sharing agreement with UNITY to enhance collaboration and ensure greater visibility into its efforts. See Appendix A-1b for management's full response.

**Summary of UNITY Management's Response:** UNITY neither agreed nor disagreed with this recommendation and stated that it already has two data-sharing agreements with OHSS about encampment decommissioning and will supply any other aggregate data reports requested. See Appendix A-3 for management's full response.

**Recommendation 9:** OHSS should continue to ensure the encampment decommissioning process follows all requirements outlined in city ordinances.

**Summary of OHSS Management's Response:** OHSS agreed with this recommendation and stated that it is OHSS's responsibility to follow requirements outlined in city ordinances and that it will continue to make sure it has a safe and dignified response to its work. See Appendix A-1b for management's full response.

**Recommendation 10:** OHSS should develop formal policies for decommissioning encampments, as well as for its other duties, including the roles and responsibilities of different partners, to establish clear guidance for future encampment decommissionings.

**Summary of OHSS Management's Response:** OHSS disagreed with this recommendation and stated that it has established clear, structured policies

for the dignified decommissioning of encampments, ensuring a humane and orderly process. See Appendix A-1b for management’s full response.

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**The City is not providing adequate oversight of shelters to ensure that shelters are following minimum health and safety standards, especially given the vulnerability of the population residing in shelters.**

Shelters are an important component of a homelessness response system. While shelters vary in size, mission, and approach, they can be key in helping people stabilize and move toward housing. Working to end an individual’s homelessness and acquire permanent housing often requires willingness to enter a shelter. HUD emphasizes the importance of ensuring safe and welcoming environments at shelters while creating low barriers to entry. Shelters that are punitive, high-barrier, or unsafe are often underutilized by people experiencing homelessness, and people may believe that living on the street is a better option.

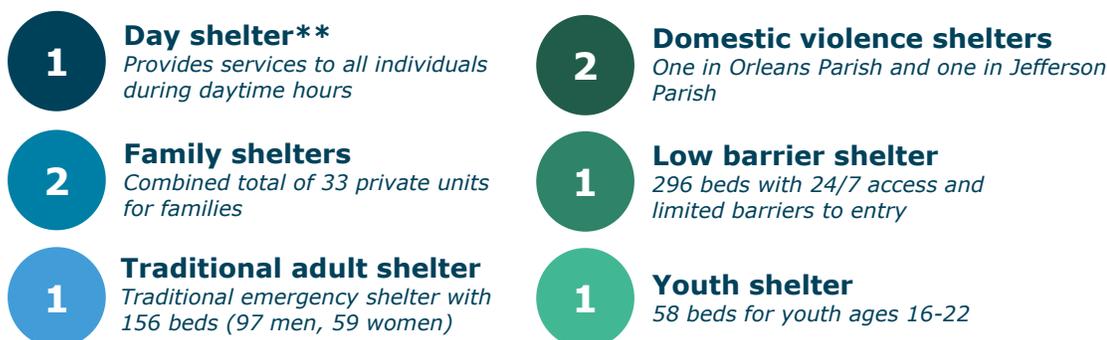
Although no one entity oversees all shelters, we identified 12 shelters operating in the New Orleans area, eight of which are funded through ESG or City funds. As of June 2024, the City had ESG contracts with six shelters,<sup>42</sup> not including the City’s low barrier shelter, which is owned by the City and not currently funded by ESG dollars.<sup>43</sup> Some shelters may also receive CoC program grants for services other than shelter operations. Not all shelters receive public funding, however. For example, the New Orleans Mission and First Grace United Methodist Church are both faith-based organizations that operate shelter facilities. In addition, other faith-based organizations also provide day shelter services (e.g., meals, showers, haircuts, etc.) or run transitional housing programs. This makes it challenging to identify all shelter resources available to people experiencing homelessness, especially due to the lack of a comprehensive list of shelters. Exhibit 12 contains information about the eight ESG- or City-funded shelters in the New Orleans area.

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<sup>42</sup> The Jefferson Parish Department of Community Development also has an ESG contract with one of these six shelters, as well as one additional domestic violence shelter in Jefferson Parish.

<sup>43</sup> While the low barrier shelter does not currently receive ESG dollars, the City funded the previous shelter operator with ESG.

## Exhibit 12 Shelters Funded by the City of New Orleans or Jefferson Parish\*



\* Only includes shelters receiving ESG dollars or other City funds. For example, there are two other privately-funded shelters that serve adults.

\*\* One additional day shelter operated during our scope. According to the provider, it had limited building occupancy due to COVID-19 and then experienced issues with the facility. It no longer offers a day shelter but continues to provide other services funded by City ESG.

**Source:** Prepared by legislative auditor's staff using information from shelter websites, stakeholder interviews, and the 2024 LLA Homelessness Initiatives and Services Survey.

**The City is not providing adequate oversight of shelters to ensure that shelters are following minimum health and safety standards, especially given the vulnerability of the population residing in shelters. OCD does not regularly inspect shelters to ensure they are meeting HUD's habitability standards.** Shelters do not have state regulations governing their facilities and operations like some similar facilities do, such as hotels,<sup>44</sup> adult day cares,<sup>45</sup> or residential treatment facilities.<sup>46</sup> Like other businesses, shelters must obtain occupational business licenses and certificates of occupancy from state or local authorities, as well as pass an inspection by the State Fire Marshal. In addition, shelters that prepare or serve food on site must also obtain and maintain a valid food service permit issued by the Office of Public Health (OPH) within the Louisiana Department of Health (LDH), and are subject to routine inspections. While some shelters must obtain licensure from state agencies, depending on services provided and/or the shelter's zoning (e.g., day care), there are no state licensing or inspection requirements specific to shelters.

Shelters that receive ESG funds for renovation or shelter operations are required to meet HUD's Minimum Habitability Standards.<sup>47</sup> The minimum standards

<sup>44</sup> Louisiana Administrative Code (LAC), Title 51, Part XV

<sup>45</sup> LAC, Title 51, Part XXI

<sup>46</sup> LAC, Title 48, Part I, Chapter 56

<sup>47</sup> Established in 24 CFR § 576.403(b). If ESG funds are used for essential services, then it does not trigger the minimum standards for emergency shelter. Essential services include case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

are broad and include elements such as structure and materials, access, space and security, interior air quality, water supply, sanitary facilities, thermal environment, illumination and electricity, food preparation, sanitary conditions, and fire safety. Because there are no state regulations specifically governing shelters, these standards are particularly important for ensuring safety, sanitation, and privacy at shelters. HUD guidance states that shelters must be inspected on-site to ensure they meet minimum standards before ESG funds are provided for shelter operations, and shelters must meet the standards for the entire period during which they receive ESG funds for operating the shelter. ESG funds can be used to bring the shelter into compliance, if needed. In addition, if shelters receive ESG shelter operating funds over a period of time, then a periodic, on-site inspection must be conducted each time it receives funds, such as annually if the shelter receives an annual allocation. According to OCD, it did not think HUD required minimum habitability standards inspections when ESG was used for shelter operations. However, the City's ESG policy states that "any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards."

HUD defines **shelter operations** as maintenance, rent, repair, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the shelter.

**Source:** 24 CFR § 576.102

We evaluated food safety inspections for ESG-funded shelters from OPH between January 2019 and August 2024. During this time, OPH conducted 89 inspections at five City-funded shelters, 71 (79.8%) of which included at least one violation. One shelter had violations noted on every inspection, while another accounted for 46 (51.7%) of the 89 total inspections. On average, OPH inspected this shelter's kitchen once every 2.5 months during our scope. Overall, while most violations were corrected on-site at the time of inspection, 23 (26.7%) of 86 total critical violations at these shelters were not corrected on-site. These violations included rodents and roaches, potentially contaminated or adulterated food, and dirty equipment and utensils. In addition, we identified at least one City-funded shelter that did not have an active food service permit,<sup>48</sup> despite continuing to prepare and serve food. Audits from other states, including New York and Utah, found serious health and safety concerns at shelters and inadequate shelter oversight. The volume and frequency of food safety violations at New Orleans area shelters is concerning because they could indicate a heightened risk of health and safety violations in other parts of the facilities.

**Despite knowledge of ongoing maintenance and sanitary issues at the City's low barrier shelter, the City conducted minimal monitoring of the**

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<sup>48</sup> According to OPH, this shelter has not had an active permit since 2007.

**facility.** The City contracted with Start Corporation to open the 100-bed City of New Orleans Shelter and Engagement Center (low barrier shelter) in August 2018 in the former Veterans Affairs Hospital building owned by the City. Low barrier shelters are an important component of homelessness services, as they have fewer requirements and barriers to entry (*see text box to right*). The low barrier shelter facility<sup>49</sup> had ongoing maintenance and sanitary issues, including broken elevators, rodents, leaks and flooding, kitchen and laundry equipment issues, broken security alarms, and lack of hot water.

**Low barrier shelters** have fewer restrictions, such as:

- Open 24 hours a day, seven days a week
- Do not have to line up for a bed at certain times
- Do not have to leave the shelter during the day
- No drug or alcohol testing for entry
- No criminal background checks for entry
- No requirement of income or payment for entry
- Allows pets and possessions

**Source:** National Alliance to End Homelessness

In January 2022, the City expanded the low barrier shelter, adding approximately 250 shelter beds to the second floor of the building. According to the City and stakeholders, expanding the shelter size worsened existing problems with the shelter, including issues with maintenance, security, and staffing. In addition, Start Corporation did not always receive payments from the City timely, which likely exacerbated its ability to properly manage the facility.<sup>50</sup> In December 2023, Start Corporation ended its contract with the City as shelter operator. The City temporarily operated the shelter until June 2024,<sup>51</sup> when the City contracted with Odyssey House to operate the shelter and reduced its capacity to 296 beds.

The City did not conduct programmatic monitoring of the low barrier shelter between fiscal years 2019 and 2024, and only conducted one on-site fiscal monitoring review in April 2019 and one remote fiscal monitoring review in May 2022. Between January 2019 and August 2019, OCD's construction group visited the low barrier shelter to monitor the facility because of ongoing construction. In the OCD Field Reports, the inspector noted the status of issues, such as trash, security staff, and issues with the bathrooms (particularly mold growth and ventilation). While the City's Department of Property Management was regularly on site to address maintenance needs, after August 2019, OCD did not conduct on-site monitoring of the facility. The City's Department of Property Management is responsible for addressing most maintenance issues with the building and did address some issues. For example, between January 2024 and October 2024,<sup>52</sup> Property Management spent \$446,087 on facility repairs, with an additional \$540,730 in repairs outstanding.

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<sup>49</sup> The low barrier shelter facility has multiple buildings that house several entities, including the municipal traffic court, Delgado Nursing Clinic, an imaging center, and a pharmacy.

<sup>50</sup> In August 2024, LLA issued an audit on the [timeliness of vendor payments in the City of New Orleans](#).

<sup>51</sup> The City contracted with Total Community Action to oversee the low barrier shelter while it sought out a new operator.

<sup>52</sup> Prior to January 2024, the Department of Property Management did not track facility maintenance costs for the low barrier shelter.

**Recommendation 11:** OCD should ensure that the shelters it funds have all the required permits, such as food safety permits, as part of its grant award process.

**Summary of OCD Management's Response:** OCD agreed with this recommendation and stated that it will make a concerted effort to ensure all funded shelters and facilities have the required permits during the grant award process. In addition, it will update its policies and procedures and monitoring tool to ensure the team has a copy of the required permits. See Appendix A-1a for management's full response.

**Recommendation 12:** OCD should inspect all publicly-funded shelters, including the City's low barrier shelter, annually to ensure shelters meet the minimum habitability standards and facilities are safe for guests.

**Summary of OCD Management's Response:** OCD agreed with this recommendation and stated that it shall continue to ensure controls are in place to ensure all City funded facilities are inspected annually to comply with federal regulations and meet the required habitability standards to provide adequate safety for guests. See Appendix A-1a for management's full response.

**Recommendation 13:** OCD should work with Property Management to develop a plan/strategy/etc. to address ongoing maintenance issues at the low barrier shelter.

**Summary of OCD Management's Response:** OCD agreed with this recommendation and stated that the City's Property Management department is responsible for the City's facilities and OCD shall implement controls and continue to work with Property Management on more effective strategies and to ensure ongoing maintenance issues are addressed timely at the low barrier shelter. See Appendix A-1a for management's full response.

**Matter for Legislative Consideration 2:** The legislature may wish to consider adopting regulations to govern emergency shelter facilities and operations.

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**Family coordinated entry for shelters is not always accessible for families in need, because it is not always easy for them to contact UNITY. In addition, UNITY did not always conduct annual evaluations and surveys of coordinated entry as required by HUD and UNITY's policy.**

HUD requires each CoC to establish and operate a coordinated entry system (*see text box at right*) with the goal of increasing the efficiency of local crisis response systems and improving fairness and ease of access to resources, including community resources. Both CoC and ESG providers are required to use the CoC's coordinated entry process, provided that it meets HUD requirements. Service providers refer individuals to coordinated entry for housing services, such as rapid rehousing or permanent supportive housing, where they are then prioritized for housing based on a variety of factors, including a standard vulnerability assessment.

**Coordinated entry** is “a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals.” Coordinated entry should cover the geographic area, be easily accessed by individuals and families seeking housing or services, be well advertised, and include a comprehensive and standardized assessment tool.

**Source:** 24 CFR § 578.3

**Family coordinated entry for shelters is not always accessible for families in need, because it is not always easy for them to contact UNITY.**

UNITY's coordinated entry policy for families requires families to contact UNITY in order to access shelter and housing services. Unlike other shelters, including adult and youth shelters, a family shelter that receives CoC or ESG funding cannot accept a family except through a referral from UNITY. UNITY requires family shelters to only accept families referred through the coordinated entry process in order for that family to be eligible for permanent housing resources. UNITY policy<sup>53</sup> requires that families accessing coordinated entry must be able to “access emergency services, such as emergency shelter, independent of the operating hours of the system's intake and assessment process. Because crisis housing options operate evening hours, families can access emergency services outside [coordinated entry system] hours through the family crisis line operated by UNITY.” When interviewing and surveying providers, improvements to the family coordinated entry system was a common thread. Providers repeatedly noted that when families call UNITY, no one answers the phone, no one returns their calls, and families cannot always access a shelter after hours or on weekends. For example, stakeholders stated:

- “No one answer[s] the phone to receive calls. Families are unable to leave a message.”
- “The coordinated entry system is slow when responding to families seeking shelter.”
- “Most access points are only open during traditional working hours. [. . .] Many times clients who call (especially families) get no response and there is no walk-in availability for families.”
- “No place to refer families at night, on weekends, or holidays.”

According to UNITY, its family coordinated entry process meets the HUD requirement to be accessible at all hours through a youth shelter that also provides

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<sup>53</sup> UNITY's policy mirrors HUD Notice CPD-17.01 Section II.B requirements.

temporary respite care for families. In addition, family shelters may not have the staffing in place to accept family referrals during evenings or weekends. In our survey of CoCs across the nation, 37 (75.5%) of 49 survey respondents<sup>54</sup> stated that their CoCs do not require families to go through coordinated entry in order to access a shelter.

According to UNITY, it has one staff and one volunteer who work on family coordinated entry, including answering phones. In addition, other UNITY staff assist with family coordinated entry as needed. In August 2024, representatives from a Louisiana United States congressman's office, the New Orleans City Council, and HUD met with UNITY regarding needed family coordinated entry improvements. UNITY has been working to improve its system by hiring additional staff to cover calls on weekends, providing additional training, and enhancing weekly reporting on caller tracking.

**UNITY did not always conduct annual evaluations of its coordinated entry process, as required by HUD policy<sup>55</sup> and UNITY's policy.** HUD states that CoCs must solicit feedback at least annually from participating projects and households about the quality and effectiveness of the entire coordinated entry experience. UNITY's policy states that the Coordinated Entry System Work Group will evaluate the coordinated entry system at least annually for compliance and effectiveness, including conducting an online survey with all providers in the geographic region, obtaining input from clients who received services through coordinated entry, and analyzing HMIS and other data sources. During fiscal years 2019 through 2024, UNITY did not conduct an evaluation each year. It conducted two evaluations on coordinated entry in 2022,<sup>56</sup> which found similar issues as those voiced by stakeholders, including:

- improving phone access,
- extending entry point hours,
- increasing flexibility for intake,
- revisiting branding, and
- updating its communications plan.

Based on stakeholder feedback and UNITY's 2022 coordinated entry evaluation, these issues appear to be ongoing. It is important for UNITY to effectively address access issues so families can more easily receive needed services.

**Recommendation 14:** UNITY should ensure that families have access to shelter after hours and on weekends.

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<sup>54</sup> Forty-nine survey respondents representing CoCs across 25 states answered this question.

<sup>55</sup> HUD Notice CPD-17.01 Section II.B

<sup>56</sup> One evaluation was specific to domestic violence survivors, sexual assault, and human trafficking survivors.

**Summary of UNITY Management’s Response:** UNITY neither agreed nor disagreed with this recommendation and stated that the recommendation falsely assumes that ensuring families have access to shelter after hours and on weekends is solely UNITY’s responsibility. UNITY further stated that most family shelters are not available to accept clients on evenings and weekends. UNITY stated that by working together with OHSS and shelters they should try to better ensure that families have access to shelter after hours and on weekends. See Appendix A-3 for management’s full response.

**LLA Additional Comments:** As family shelters are required to accept families only through UNITY’s coordinated entry process in order to maintain eligibility for rapid rehousing services, UNITY is the primary point of contact for families, even after hours and on weekends. While UNITY cannot address shelter staffing or hours, it can improve its availability to respond to families after hours or on weekends, especially because HUD states that persons should be able to access emergency services, such as emergency shelter, independent of the operating hours of the system’s intake and assessment process.

**Recommendation 15:** UNITY should ensure it evaluates its coordinated entry process annually.

**Summary of UNITY Management’s Response:** UNITY agreed with this recommendation. See Appendix A-3 for management’s full response.

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**Providers we surveyed indicated that the City and UNITY need to improve communication, including better availability and responsiveness to providers, clarity regarding policies and procedures, and more timely reimbursements.**

As mentioned previously, there are various entities administering homelessness initiatives, as well as multiple providers throughout the New Orleans area. UNITY leads monthly CoC provider meetings, as well as weekly meetings regarding coordinated entry and other services. The City also held weekly calls regarding the encampment decommissioning process. Stakeholders noted that increased communication, such as responsiveness and more clarity on policies and procedures, would improve overall service delivery. In addition, accurate and accessible information about available services could help providers, stakeholders, and citizens better assist individuals experiencing homelessness.

**Providers we surveyed indicated that the City and UNITY need to improve communication.** Providers indicated that the City should improve communication, including better availability and responsiveness to providers, clarity regarding policies and procedures, and more timely reimbursements. Providers stated that more communication to partner agencies would be beneficial.

Respondents were split regarding the City’s clarity of policies and procedures and overall support and assistance, as six (50.0%) of 12 respondents rated those elements as “excellent” or “good,” and five (41.7%) rated them as “fair” or “poor.” Overall, respondents were most concerned with the City’s timeliness of payments, as three (25.0%) rated timeliness of payments as “excellent” or “good,” and six (50.0%) rated it as “fair” or “poor.”<sup>57</sup>

Providers also stated that they would like UNITY to be more responsive when providers try to contact them. For example, providers stated that it is hard to reach UNITY by phone or email, and they do not always respond timely to email or phone messages. When asked to rate their experiences with UNITY, seven (41.2%) of 17 respondents rated responsiveness to questions, availability for help or assistance, and overall communications as “excellent” or “good,” while 10 (58.8%) rated those elements as “fair” or “poor.” Respondents also indicated a need for more clarity regarding policies and procedures, as six (35.3%) rated clarity as “excellent” or “good,” while 11 (64.7%) rated it “fair” or “poor.” Exhibit 13 shows the results of our provider survey regarding providers’ experiences with the City and UNITY.

<b>Exhibit 13 Providers Rating Their Experiences with Either the City or UNITY as "Excellent" or "Good" August 2024</b>				
<b>Provider Experience</b>	<b>City</b>		<b>UNITY</b>	
	<b>Number of Respondents (12)*</b>	<b>Percent</b>	<b>Number of Respondents (17)**</b>	<b>Percent</b>
Responsiveness to questions	8	66.7%	7	41.2%
Availability for help or assistance	8	66.7%	7	41.2%
Overall communication	8	66.7%	7	41.2%
Clarity of policies and procedures	6	50.0%	6	35.3%
Decisions regarding funding priorities	7	58.3%	8	47.1%
Timeliness of payments	3	25.0%	7	41.2%
Overall support and assistance	6	50.0%	8	47.1%

\* Includes only the 12 respondents who said they received funding directly from or via the City.  
 \*\* Includes only the 17 respondents who said they received funding via UNITY.  
**Source:** Prepared by legislative auditor’s staff using results from the 2024 LLA’s Homelessness Initiatives and Services Survey.

**Information about available resources is difficult to find and may be out of date.** Both the City and UNITY have webpages about their organizations. Clearer and additional information on these webpages would better provide citizens important information about accessing homelessness services. Specifically, we found:

- OHSS’s webpage includes a listing of services, including shelters, food assistance, and health care. However, the listings can be difficult to find. For example, as mentioned on page 31, there is not a

<sup>57</sup> Three respondents (25.0%) rated the timeliness of payments as “neutral/no opinion.” In August 2024, LLA issued an audit on the [timeliness of vendor payments in the City of New Orleans](#).

comprehensive, up-to-date list of shelters. Clearer wording on the webpage could help people find information more easily.

- UNITY's website does not include any information about how to access services, other than listing their main phone number. Web searches for homelessness services in New Orleans returned a UNITY brochure of services, but it was out of date, not fully accurate, and not clearly accessible through their website. For example, three shelters listed on the brochure were closed, one active shelter had out-of-date contact information, and we identified additional shelters that are not included on the brochure.

In addition, other organizations in New Orleans have homelessness resources lists, but many of them were also out of date. Individuals can call or text 2-1-1 to get information about a variety of services in their area. However, individuals may not be aware of that option. In addition, our audit team contacted 2-1-1 via text, and it could not provide basic information on day shelter availability or other basic information about shelters and housing. Some CoC websites in other cities include a "Get Help" link that navigates to services. For example, both the Atlanta and Memphis CoC Lead Agencies include a banner at the top of their websites that navigates to services. When an individual clicks the "Get Help" link from either website, they are directed to a page that provides information on services and assists individuals in determining what they need. Including similar, easily accessible information on the City's and/or UNITY's websites to assist individuals in determining what services exist and how to access them would help the public and community providers to understand what services are available.

**Recommendation 16:** OCD and OHSS should each improve its communication with providers.

**Summary of OCD Management's Response:** OCD agreed with this recommendation and stated that it will continue to implement processes and improve its communication with its providers. It currently conducts an annual Start-Up conference with all providers, as well as monthly Let's Talk Conference call with all providers. See Appendix A-1a for management's full response.

**Summary of OHSS Management's Response:** OHSS agreed with this recommendation and stated that it has already worked on a process with OCD to help agencies on the front end with their financial obligations to ensure the agencies can run their programs and that it will continue to work on a better communication strategy to allow people to access information. See Appendix A-1b for management's full response.

**Recommendation 17:** UNITY should improve its communication with providers.

**Summary of UNITY Management’s Response:** UNITY agreed with this recommendation and stated that it will do a better job of communicating, conduct listening sessions, and set up a complaint system to ensure it understands and timely responds to concerns. See Appendix A-3 for management’s full response.

**Recommendation 18:** OHSS should make resources for homelessness services more accessible to the public, such as making the resources on their website more visible.

**Summary of OHSS Management’s Response:** OHSS agreed with this recommendation and stated that it plans to work on ways to get more access to people on the website so they can navigate to all the services. See Appendix A-1b for management’s full response.

**Recommendation 19:** UNITY should clearly communicate resources for homelessness services to the public, such as on their website.

**Summary of UNITY Management’s Response:** UNITY agreed with this recommendation. See Appendix A-3 for management’s full response.

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**New Orleans faces multiple challenges to effectively address homelessness. Lack of affordable housing, as well as the need for living wage employment opportunities, is a primary driver of homelessness. Other challenges New Orleans faces to effectively address homelessness include behavioral health and substance use needs, transportation, funding, and staffing levels.**

The United States suffers from a shortage of safe, affordable, and accessible rental housing. Housing shortages are caused by many factors, including a shortage of available land and labor, increased costs of raw materials, local zoning restrictions, land-use regulations, opposition to inclusive development, and the destruction of homes due to natural disasters. According to a study by Louisiana State University-Shreveport,<sup>58</sup> Louisiana had a shortage of 220,689 affordable and available rental units at very and extremely low-income levels in 2022, with the majority of the shortage in the Baton Rouge, Monroe, New Orleans-Metairie-Slidell, Ruston, and Shreveport-Bossier areas. Further, the National Low Income Housing Coalition (NLIHC)<sup>59</sup> estimates that approximately 77.0% of extremely low-income households in New Orleans (i.e., those earning at or below 30.0% of Area Median

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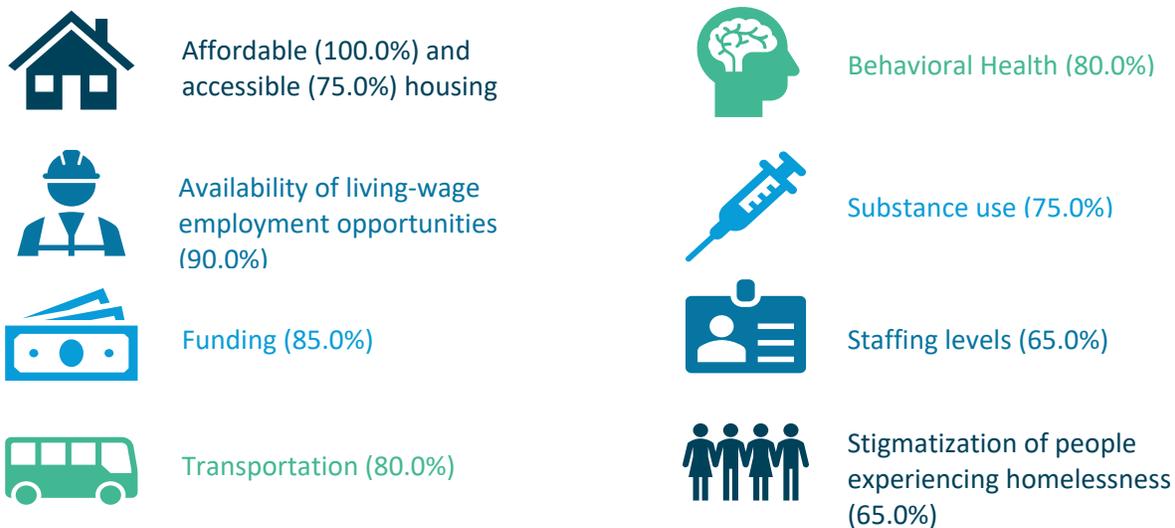
<sup>58</sup> [Rental Housing Affordability in Louisiana, 2022](#)

<sup>59</sup> [The Gap: A Shortage of Affordable Homes, 2024](#)

Income) are severely cost-burdened, meaning they pay more than half of their income toward housing.

The U.S. Substance Abuse and Mental Health Services Administration (SAMHSA) notes<sup>60</sup> that stigmatization of individuals experiencing homelessness leads to discrimination, as they are erroneously stereotyped as lazy, dangerous, and solely responsible for their homelessness. It also states that the stigma surrounding homelessness and mental and substance use disorders worsens health and well-being by creating barriers that prevent recovery. In addition, access to transportation impacts both housing and non-housing outcomes, because it is an often-cited barrier to health management, employment, and permanent supportive housing.<sup>61</sup> The City, UNITY, and stakeholders identified numerous challenges facing the homelessness response system in the New Orleans area, such as the lack of affordable housing. Exhibit 14 shows challenges to effectively address homelessness identified by survey respondents for the New Orleans area.

**Exhibit 14**  
**Provider Survey Responses\* to Challenges in Effectively Addressing Homelessness in the New Orleans Area**



\* Twenty respondents answered this survey question.

**Source:** Prepared by legislative auditor’s staff using responses to the 2024 LLA Homelessness Initiatives and Services Survey.

**Lack of affordable housing, as well as the availability of living wage employment opportunities, is a primary driver of homelessness.** In our provider survey, 100.0% of respondents listed affordable housing as a challenge in the New Orleans area, with 85.0% listing it as a challenge for their organization. According to Pew Research Center, research has consistently found that homelessness in an area is tied to housing costs, including rising rent prices. As rental prices increase, renters face a greater possibility of eviction which, in turn,

<sup>60</sup> [Addressing Social Determinants of Health Among Individuals Experiencing Homelessness, 2023](#)

<sup>61</sup> [Erin Roark Murphy, “Transportation and Homelessness: A Systematic Review,” February 2019](#)

increases their likelihood of experiencing homelessness. According to U.S. Census data, median monthly gross rent for a one-bedroom home in the New Orleans-Metairie Metropolitan Statistical Area<sup>62</sup> increased by 19.0% from calendar years 2019 through 2023, from \$828 per month to \$985 per month. According to HUD data, the 2024 extremely low-income limit in the New Orleans area is \$1,521 per month, or \$8.77 per hour. This means that an affordable monthly rent, which HUD states is when residents pay 30.0% or less of their income for rent, is \$456 per month. However, HUD's fair market monthly rent rate of a one-bedroom home in the New Orleans area was \$1,149 in 2024. In order to afford the fair market rent for a one-bedroom home in the New Orleans area, a person would need to earn at least \$22.10 per hour. While HUD's fair market rent valuation equaled or exceeded median gross rent prices from 2019 to 2023,<sup>63</sup> HUD funding for housing programs does not always cover the full cost of rent.

"We desperately need more affordable and accessible housing. There is simply not enough housing available. Working class jobs do not provide sufficient salary for our high housing costs."

"Demand for our services continues to increase year after year. Similarly, costs to provide these services increase year after year while the amount of government money that we receive remains the same."

"We have case managers who are working diligently to provide wrap around services, however the cost of housing has skyrocketed. Based on this issue, the number of families awarded was decreased due to the funding we were allocated."

**Source:** 2024 LLA Homelessness Services and Initiatives Survey

**Other challenges that New Orleans faces to effectively address homelessness**

**include behavioral health and substance use needs, transportation, funding, and staffing levels.** Individuals experiencing homelessness may also have behavioral health and/or substance use needs. According to HUD,<sup>64</sup> in 2023, 21.0% of individuals experiencing homelessness nationwide reported having serious mental illness, and 16.5% reported having a substance use disorder. In addition to housing, these individuals may need treatment or additional services to address these needs. In addition, limited access to transportation creates challenges for individuals to access treatment, housing, employment, or other services. Stakeholders told us that once an individual is housed, especially in an area that is not in proximity to needed services or employment, not having transportation creates significant challenges for the individual to remain housed.

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<sup>62</sup> Includes Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, and St. Tammany Parishes.

<sup>63</sup> Median gross rent data are not available for 2024.

<sup>64</sup> [HUD 2023 Continuum of Care Homeless Assistance Programs Homeless Populations](#). PIT counts nationwide counted 653,104 individuals that were experiencing homelessness on a single night in January 2023.

Stakeholders also note that funding levels are not always sufficient to cover the overall need for services and housing. HUD funding often has restrictions, leaving gaps that must be addressed with other funds. For example, the City created a Flex Fund with ARPA and private dollars, and some of those funds are for landlord incentives, such as new air conditioning units and new appliances, in order to increase the number of landlords who would rent to formerly unhoused individuals. In addition, CoC funds require funding recipients to match award dollars.<sup>65</sup> For example, the ESG match is 100.0%, and the CoC match is 25.0%. Providers may use private funds for the match or may leverage other federal funds, such as Medicaid, to meet the match requirements. Stakeholders stated that state funding to meet match requirements would be helpful. Except for veterans programs and domestic violence programs, Louisiana does not regularly dedicate state funds to homelessness initiatives. We surveyed CoCs nationwide, and CoCs in 22 (81.5%) of 27 states<sup>66</sup> reported receiving state funds in addition to federal funds. Providers also listed staffing levels as a challenge to effectively provide homelessness services. The National Alliance to End Homelessness discusses low wages and high turnover in the homelessness sector, noting low wages are a key reason why employees leave their organizations.<sup>67</sup>

“As our unhoused population has grown substantially in the past few years, our organization has needed to raise more funding for staffing, food services, case management, etc. We do not turn clients away, so we are in need of additional funding resources as to provide our small staff with a healthy work load.”

**Source:** 2024 LLA Homelessness Services and Initiatives Survey

**According to stakeholders, available shelter resources may not be sufficient to meet the need for shelter beds.** While there are at least 12 shelters in the New Orleans area, the availability of shelter beds or other shelter services may not be sufficient to meet the needs of people experiencing homelessness. Of the nine New Orleans area shelters that responded to our survey, five (55.6%) rated the availability of shelter services as either “fair” or “poor.” Six (75.0%) of the eight overnight shelters also said that they “always” or “often” reach their bed capacity, with two (25.0%) of eight indicating that they often exceed their capacity. One shelter we visited explained that they have to prioritize male individuals during their daily intake process because they always reach their bed capacity for men, but they can usually accommodate some additional men in a separate overflow area on the women’s side. Space is particularly limited for families experiencing homelessness. According to UNITY, limited family shelter space is the reason they require families to obtain a coordinated entry referral for shelter stays.

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<sup>65</sup> 42 USCA § 11375 requires a 100.0% match for ESG funds, though state grantees (e.g., LHC) may deduct up to \$100,000 from their total award before calculating their match. State grantees that receive less than \$100,000 in total ESG funding annually may not be required to provide a match. A 25.0% match is required for all CoC program grant recipients per 42 USCA §11386d.

<sup>66</sup> Fifty-four survey respondents representing CoCs across 27 states answered this survey question. If any CoC in the state reported receiving state funds, even minimal funds, we counted that state as receiving state funds.

<sup>67</sup> [Illustrating the Limits of Homeless Sector Wages: Employees Likely Struggle to Pay the Rent, 2022](#)

According to research conducted by NOHD in 2023, high barriers and shelter conditions deterred people experiencing homelessness from utilizing available shelter resources. The study found that people experiencing homelessness felt unsafe in area shelters, felt treated poorly by shelter staff, and disliked strict rules pertaining to check-in/check-out times and the duration of time they could stay at the facilities. People experiencing homelessness also reported that they were unable to receive assistance in finding housing, getting a job, or getting their medical needs addressed at shelters. NOHD recommended that shelters lower their barriers to entry and that the City create incentives for shelters to do so.



**APPENDIX A-1a: CITY OF NEW ORLEANS OFFICE OF  
HOUSING POLICY AND COMMUNITY DEVELOPMENT  
MANAGEMENT’S RESPONSE**

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OFFICE OF HOUSING POLICY AND COMMUNITY DEVELOPMENT  
CITY OF NEW ORLEANS

LATOYA CANTRELL  
MAYOR

TYRA JOHNSON BROWN  
DIRECTOR

February 21, 2025

Mr. Michael J. "Mike" Waguespack, CPA  
Legislative Auditor  
Louisiana Legislative Auditor (LLA)  
P.O. Box 94397  
Baton Rouge, LA 70804

**RE: City of New Orleans Response to LLA Recommendations**

Dear Mr. Waguespack:

The City of New Orleans is in receipt of the Louisiana Legislative Auditor's (LLA) Preliminary Draft – Homeless Initiatives in New Orleans report which was submitted on February 14, 2025. The City's response to the recommendations cited by LLA are provided below:

**Louisiana Legislative Auditor Recommendation 1:**

As OCD has resumed program monitoring, it should conduct all reviews required by its policies and procedures, including reviewing each provider annually.

**City of New Orleans Response to Recommendation 1:**

As you are aware, the City experienced a shutdown of all IT systems (computers, software, printers, copiers, scanners etc.) due to a Cyber Attack on December 13, 2019 in addition to the nationally declared Covid-19 outbreak which caused major challenges to the City's operations. The City was granted waivers from HUD in regards to monitoring and other reporting due to these unfortunate events. However, OCD has resumed its programmatic monitoring and is in the process of finalizing its programmatic monitoring for all City funded providers. OCD will continue to ensure all City funded providers are reviewed on an annual basis.

**Louisiana Legislative Auditor Recommendation 11:**

OCD should ensure that the shelters it funds have all the required permits, such as food safety permits, as part of its grant award process.

**City of New Orleans Response to Recommendation 11:**

OCD will make a concerted effort to ensure all funded shelters and facilities have the required permits during the grant award process. OCD will also update its policies and procedures and monitoring tool to ensure the programmatic team has a copy of the required permits.

**Louisiana Legislative Auditor Recommendation 12:**

OCD should inspect all publicly funded shelters, including the City's low barrier shelter, annually to ensure shelters meet the minimum habitability standards and facilities are safe for guests.

**City of New Orleans Response to Recommendation 12:**

OCD shall continue to ensure controls are in place to ensure all City funded facilities are inspected annually to comply with federal regulations and meet the required habitability standards to provide adequate safety for guest. OCD will also update its policies and procedures and monitoring tool to ensure the programmatic team inspects the publicly funded shelters in addition to the Construction Unit's annual inspection.

**Louisiana Legislative Auditor Recommendation 13:**

OCD should work with Property Management to develop a plan/strategy/etc. to address ongoing maintenance issues at the low barrier shelter.

**City of New Orleans Response to Recommendation 13:**

The City's Property Management department is responsible for the City's facilities and shall implement controls and continue to work with Property Management on more effective strategies and to ensure ongoing maintenance issues are addressed timely at the low barrier shelter.

**Louisiana Legislative Auditor Recommendation 16:**

OCD and Office of Homeless Services and Strategy (OHSS) should improve its communication with providers.

**City of New Orleans Response to Recommendation 16:**

OCD and OHSS will continue to implement processes and improve its communication with its providers. OCD conducts an annual Start-Up conference which is held with all providers to ensure compliance and communication to the providers of any updates or concerns required to be addressed. All responsible City departments are included in the Start Up Conference and provide a presentation for their respective responsibilities. OCD also conducts a Let's Talk Conference call with all of its providers on a monthly basis to ensure all providers are in compliance with the program and to address any concerns.

The City of New Orleans takes these recommendations very seriously and will work continuously with City funded providers, Louisiana Legislative Auditor representatives, and OHSS, and its providers to ensure compliance with all recommendations and federal requirements. If you have any questions or further information is required, please feel free to contact Ronald Fornerette, Jr. at (504) 658-4252 or email him at [rcfornerette@nola.gov](mailto:rcfornerette@nola.gov).

Sincerely,



Tyra J. Brown  
Director of Housing Policy and Community Development

TJB/rcf

Cc: Corcherrie Allen  
Madelyn Sanchez  
Nate Fields  
Amanda Sanford  
Christopher McGee

1340 POYDRAS STREET | SUITE 1000 | NEW ORLEANS, LOUISIANA 70112  
PHONE 504-658-4200 | FAX 504-658-4238



**Agency: City of New Orleans Office of Community Development**

**Audit Title: Homelessness Initiatives in the City of New Orleans**

**Audit Report Number: 40230032**

**Instructions to Audited Agency:** Please fill in the information below for each recommendation. A summary of your response for each recommendation will be included in the body of the report. The entire text of your response will be included as an appendix to the audit report.

<b>Conclusion 2: The City, LHC, and UNITY have processes to monitor providers; however, most fiscal and programmatic compliance monitoring was suspended during the COVID-19 pandemic.</b>	
<i>Recommendation 1: As OCD has resumed program monitoring, it should conduct all reviews required by its policies and procedures, including reviewing each provider annually.</i>	
Does Agency Agree with Recommendation?	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Agency Contact Responsible for Recommendation:	
<i>Name/Title: Tyra Johnson Brown</i>	
<i>Address: 1340 Poydras Street Suite 1000</i>	
<i>City, State, Zip: New Orleans, LA 70112</i>	
<i>Phone Number: (504)658-4294</i>	
<i>Email: ttjohnson@nola.gov</i>	

<b>Conclusion 5: The City is not providing adequate oversight of shelters to ensure that shelters are following minimum health and safety standards, especially given the vulnerability of the population residing in shelters.</b>	
<i>Recommendation 11: OCD should ensure that the shelters it funds have all the required permits, such as food safety permits, as part of its grant award process.</i>	
Does Agency Agree with Recommendation?	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Agency Contact Responsible for Recommendation:	
<i>Name/Title: Tyra Johnson Brown</i>	
<i>Address: 1340 Poydras Street Suite 1000</i>	
<i>City, State, Zip: New Orleans, LA 70112</i>	
<i>Phone Number: (504)658-4294</i>	
<i>Email: ttjohnson@nola.gov</i>	

<i>Recommendation 12: OCD should inspect all publicly-funded shelters, including the City's low barrier shelter, annually to ensure shelters meet the minimum habitability standards and facilities are safe for guests.</i>
Does Agency Agree with Recommendation? <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Agency Contact Responsible for Recommendation:
<i>Name/Title: Tyra Johnson Brown</i>
<i>Address: 1340 Poydras Street Suite 1000</i>
<i>City, State, Zip: New Orleans, LA 70112</i>
<i>Phone Number: (504)658-4294</i>
<i>Email: ttjohnson@nola.gov</i>
<i>Recommendation 13: OCD should work with Property Management to develop a plan/strategy/etc. to address ongoing maintenance issues at the low barrier shelter.</i>
Does Agency Agree with Recommendation? <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Agency Contact Responsible for Recommendation:
<i>Name/Title: Tyra Johnson Brown</i>
<i>Address: 1340 Poydras Street Suite 1000</i>
<i>City, State, Zip: New Orleans, LA 70112</i>
<i>Phone Number: (504)658-4294</i>
<i>Email: ttjohnson@nola.gov</i>

<b>Conclusion 7: Providers we surveyed indicated that the City and UNITY need to improve communication, including better availability and responsiveness to providers, clarity regarding policies and procedures, and more timely reimbursements.</b>
<i>Recommendation 16: OCD and OHSS should improve its communication with providers.</i>
Does Agency Agree with Recommendation? <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Agency Contact Responsible for Recommendation:
<i>Name/Title: Tyra Johnson Brown</i>
<i>Address: 1340 Poydras Street Suite 1000</i>
<i>City, State, Zip: New Orleans, LA 70112</i>
<i>Phone Number: (504) 658-4294</i>
<i>Email: ttjohnson@nola.gov</i>

**APPENDIX A-1b: CITY OF NEW ORLEANS OFFICE OF  
HOMELESS SERVICES AND STRATEGY  
MANAGEMENT'S RESPONSE**

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LATOYA CANTRELL  
MAYOR

NATHANIEL FIELDS  
DIRECTOR

March 6, 2025

Mr. Michael J. "Mike" Waguespack, CPA  
Legislative Auditor  
Louisiana Legislative Auditor  
P.O. Box 94397  
Baton Rouge, LA 70804-9397

**RE: Office of Homeless Services & Strategies Response to LLA Recommendations**

Dear Mr. Waguespack,

The Office of Homeless Services & Strategies is writing in response to the LLA Preliminary Draft on Homelessness initiatives. After review we wanted to make comments on the proposed recommendations and add that some items have already been addressed and that we will continue to be a valued partner to all office that work with homeless services including and not limited to: Office of Housing Policy and Community Development, Unity of Greater New Orleans, etc.

**Louisiana Legislative Auditor Recommendation 4:**

OHSS is in the final stages of creating a strategic plan with clearly defined measurable goals and outcomes—developed through close collaboration with Unity and other key partners in the Continuum of Care. While this audit was in progress, OHSS and Unity are completed a series of critical community meetings focused on ensuring the long-term sustainability of the strategic plan to combat homelessness in Orleans Parish.

**Louisiana Legislative Auditor Recommendation 5:**

OHSS is close to the end of the development a long-term strategic plan to address homelessness. This plan was created through several meetings with community partners to ensure its sustainability and impact.

**Louisiana Legislative Auditor Recommendation 8:**

OHSS is committed to full transparency and accountability in the encampment decommissioning process. We are actively pursuing a more comprehensive data-sharing agreement with Unity to enhance collaboration and ensure greater visibility into our efforts. OHSS has consistently demonstrated openness and integrity in our work, openly sharing outcomes with the community and all stakeholders who seek to understand the direct-to-housing model—an essential component of this program's success.

**Louisiana Legislative Auditor Recommendation 9:**

It is our responsibility as a city agency to follow all the requirements outlined in all city ordinances pertaining to the work with the unsheltered population. We will continue to make sure that we have a safe dignified response to all the work that is and will take place and follow all city ordinances and best practices all times.

**Louisiana Legislative Auditor Recommendation 10:**

OHSS has established clear, structured policies for the dignified decommissioning of encampments, ensuring a humane and orderly process. We are resending these policies with this letter to reaffirm their receipt and

1340 POYDRAS STREET SUITE 1000 NEW ORLEANS, LOUISIANA 70112  
PHONE 504-658-8600



# CITY OF NEW ORLEANS

LATOYA CANTRELL  
MAYOR

NATHANIEL FIELDS  
DIRECTOR

understanding. Our approach prioritizes respect and stability for those transitioning into housing—no heavy equipment is used before all individuals have been safely relocated, and all personal belongings are handled with care before any site work begins.

**Louisiana Legislative Auditor Recommendation 16:**

OHSS has already worked on a process with OCD to help agencies on the front end with their financial obligations so that they have the ability to run their programs and not have to worry about the financial obligations but put all their attention on the work at hand. OHSS and OCD should work on a better communication strategy that will allow people to see all the resources on the city website so that anyone can access information, including the providers.

**Louisiana Legislative Auditor Recommendation 18:**

OHSS will be working on ways to get more access to people on the website so that they can find a way to navigate all the services.

The City of New Orleans takes these recommendations very seriously and will work closely with City funded providers, Louisiana Legislative Auditor representatives, and OCD. If you need any more information, please reach out to myself at (504) 325-6981 or email me at [Nathaniel.Fields@nola.gov](mailto:Nathaniel.Fields@nola.gov).

Sincerely,



Nathaniel E. Fields  
Director Of Homeless Services & Strategy

Cc: Tyra J. Brown  
Ronald Fornerette  
Madelyn Sanchez  
Taylor Diles  
Clara Flores



**Agency: City of New Orleans Office of Homeless Services and Strategy**

**Audit Title: Homelessness Initiatives in the City of New Orleans**

**Audit Report Number: 40230032**

**Instructions to Audited Agency:** Please fill in the information below for each recommendation. A summary of your response for each recommendation will be included in the body of the report. The entire text of your response will be included as an appendix to the audit report.

<b>Conclusion 3: The New Orleans CoC needs increased collaboration among the City, UNITY, and providers in order to develop and implement a cohesive strategic plan for addressing homelessness in New Orleans.</b>	
<i>Recommendation 4: OHSS and UNITY should work more collaboratively to develop a long-term strategic plan with measurable goals.</i>	
Does Agency Agree with Recommendation?	<input type="checkbox"/> X Agree <input checked="" type="checkbox"/> Disagree
Agency Contact Responsible for Recommendation:	
<i>Name/Title: Nathaniel Fields, Director</i>	
<i>Address: 1340 Poydras, suite 962</i>	
<i>City, State, Zip: New Orleans, LA 70112</i>	
<i>Phone Number: 504-658-4148</i>	
<i>Email: Nathaniel.fields@nola.gov</i>	
<i>Recommendation 5: OHSS should continue to develop a long-term strategic plan to address homelessness.</i>	
Does Agency Agree with Recommendation?	<input type="checkbox"/> X Agree <input checked="" type="checkbox"/> Disagree
Agency Contact Responsible for Recommendation:	
<i>Name/Title: Nathaniel Fields, Director</i>	
<i>Address: 1340 Poydras, suite 962</i>	
<i>City, State, Zip: New Orleans, LA 70112</i>	
<i>Phone Number: 504-658-4148</i>	
<i>Email: Nathaniel.fields@nola.gov</i>	

<p><b>Conclusion 4: According to OHSS and UNITY, 275 individuals have been housed through targeted encampment decommissioning. Overall, OHSS’s process for decommissioning encampments generally followed city ordinances and best practices. As of December 2024, UNITY spent \$2.3 million (15.4%) of the \$15.0 million three-year special HUD grant available for addressing encampments. In addition, various external circumstances impacted OHSS’s progress.</b></p>
<p><i>Recommendation 8: OHSS and UNITY should develop a data-sharing agreement that increases transparency and allows for determining overall outcomes from the encampment decommissioning process.</i></p>
<p>Does Agency Agree with Recommendation?    <input type="checkbox"/> X Agree <input type="checkbox"/> Disagree</p>
<p>Agency Contact Responsible for Recommendation:</p>
<p><i>Name/Title: Nathaniel Fields, Director</i></p>
<p><i>Address: 1340 Poydras, suite 962</i></p>
<p><i>City, State, Zip: New Orleans, LA 70112</i></p>
<p><i>Phone Number: 504-658-4148</i></p>
<p><i>Email: Nathaniel.fields@nola.gov</i></p>
<p><i>Recommendation 9: OHSS should continue to ensure the encampment decommissioning process follows all requirements outlined in city ordinances.</i></p>
<p>Does Agency Agree with Recommendation?    <input type="checkbox"/> X Agree <input type="checkbox"/> Disagree</p>
<p>Agency Contact Responsible for Recommendation:</p>
<p><i>Name/Title: Nathaniel Fields, Director</i></p>
<p><i>Address: 1340 Poydras</i></p>
<p><i>City, State, Zip: New Orleans, LA 70112</i></p>
<p><i>Phone Number: 504-658-4148</i></p>
<p><i>Email: Nathaniel.fields@nola.gov</i></p>
<p><i>Recommendation 10: OHSS should develop formal policies for decommissioning encampments, as well as for its other duties, including the roles and responsibilities of different partners, to establish clear guidance for future encampment decommissionings.</i></p>
<p>Does Agency Agree with Recommendation?    <input type="checkbox"/> Agree    <input checked="" type="checkbox"/> X Disagree</p>
<p>Agency Contact Responsible for Recommendation:</p>
<p><i>Name/Title: Nathaniel Fields, Director</i></p>
<p><i>Address: 1340 Poydras, Suite 962</i></p>
<p><i>City, State, Zip: New Orleans, LA 70112</i></p>
<p><i>Phone Number: 504-658-4148</i></p>
<p><i>Email: Nathaniel.fields@nola.gov</i></p>

**Conclusion 7: Providers we surveyed indicated that the City and UNITY need to improve communication, including better availability and responsiveness to providers, clarity regarding policies and procedures, and more timely reimbursements.**

*Recommendation 16: OCD and OHSS should each improve its communication with providers.*

Does Agency Agree with Recommendation?  X Agree  Disagree

Agency Contact Responsible for Recommendation:

*Name/Title: Nathaniel Fields, Director*

*Address: 1340 Poydras, Suite 962*

*City, State, Zip: New Orleans, LA*

*Phone Number: 504-658-4148*

*Email: Nathaniel.fields@nola.gov*

*Recommendation 18: OHSS should make resources for homelessness services more accessible to the public, such as making the resources on their website more visible.*

Does Agency Agree with Recommendation?  X Agree  Disagree

Agency Contact Responsible for Recommendation:

*Name/Title: Nathaniel Fields, Director*

*Address: 1340 Poydras, Suite 962*

*City, State, Zip: New Orleans, LA 70112*

*Phone Number: 504-658-4140*

*Email: Nathaniel.fields@nola.gov*



**APPENDIX A-2: LOUISIANA HOUSING  
CORPORATION MANAGEMENT'S RESPONSE**

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**JEFF LANDRY**  
GOVERNOR



**KEVIN J. DELAHOUSSAYE**  
LHC EXECUTIVE DIRECTOR

# *Louisiana Housing Corporation*

March 5, 2025

Michael J. "Mike" Waguespack, Legislative Auditor  
Louisiana Legislative Auditor  
PO Box 94397  
Baton Rouge, LA 70804-9397

Dear Mr. Waguespack.

Louisiana Housing Corporation (LHC) is in receipt of the Louisiana Legislative Auditor's (LLA) comprehensive Homelessness Initiative Audit Report. The recommendation is duly noted and appreciated. The LHC agrees with the observation and recommendation concerning program monitoring. Be advised that LHC has resumed its program monitoring of the Louisiana Permanent Supportive Housing Initiative post Covid-19. Attached herewith is the executed Recommendation Checklist.

Please let us know if you need anything additional.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin J. Delahoussaye".

Kevin J. Delahoussaye, Executive Director  
Louisiana Housing Corporation

Attachment

**Agency:** Louisiana Housing Corporation

**Audit Title:** Homelessness Initiatives in the City of New Orleans

**Audit Report Number:** 40230032

**Instructions to Audited Agency:** Please fill in the information below for each recommendation. A summary of your response for each recommendation will be included in the body of the report. The entire text of your response will be included as an appendix to the audit report.

<b>Conclusion 2: The City, LHC, and UNITY have processes to monitor providers; however, most fiscal and programmatic compliance monitoring was suspended during the COVID-19 pandemic.</b>	
<i>Recommendation 2: As LHC has resumed program monitoring, it should conduct all reviews required by its policies and procedures.</i>	
Does Agency Agree with Recommendation?	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Agency Contact Responsible for Recommendation:	
<i>Name/Title:</i> Brenda Evans, Chief Programs Officer	
<i>Address:</i> 2415 Quail Drive	
<i>City, State, Zip:</i> Baton Rouge, LA 70808	
<i>Phone Number:</i> 225-763-8852	
<i>Email:</i> bevans@lhc.la.gov	

**APPENDIX A-3: UNITY OF GREATER NEW ORLEANS  
MANAGEMENT'S RESPONSE**

---



March 12, 2025

Michael J. Waguespack, C.P.A.  
1600 North Third Street  
Post Office Box 94397  
Baton Rouge LA 70804-9397

Dear Mr. Waguespack:

Thank you for all that you and your staff do to prevent and root out corruption and fraud in our state. UNITY of Greater New Orleans, a nonprofit organization leading the coordination of the work to reduce homelessness in New Orleans and Jefferson Parish since our founding in 1992 by many community leaders, strongly believes in the mission of the LLA to eliminate corruption and fraud in a state that has been historically troubled with those problems, and to ensure the most effective use of the state's money in a state where so many people live in poverty. We strongly align with those goals. We work hard every day to ensure that the federal Homeless Continuum of Care funds that we oversee, on behalf of the most vulnerable people in our community and on behalf of governmental and nonprofit service providers and partners, are stretched as far as possible and used most effectively and cost-efficiently to end the homelessness of as many vulnerable people as possible in order to make our community a better place for everyone, especially those suffering in homelessness.

It was always our hope, as stated by your audit team, that this performance audit report of homelessness initiatives in New Orleans, even though instigated by a political request, would enlighten the public with truthful information about the substantial and persistent problem of homelessness, what is being done about it, how successful those efforts are, and what more needs to be done. **Because of the outstanding partnerships in our community and state to reduce homelessness, despite soaring rents our community has successfully bucked the national trend of rising unsheltered homelessness. As illustrated in our attachments, from 2016-2024, unsheltered homelessness rose nationally by 55 percent, while during the same period unsheltered homelessness actually decreased by 5 percent. While without a doubt we face difficult challenges because of the shortage of affordable housing, our strong public-private partnerships, long history of working together, and the deep experience and expertise of our service providers will serve us well in the months and years ahead.**

We have expressed our deep concerns to you about erroneous and misleading statements in the report that UNITY did not turn over all information requested and therefore LLA "was unable to evaluate the outcomes associated with homelessness programs and activities." We do very much appreciate the fact that, after we expressed our concerns directly to you, you amended the draft of the report to remove the false statement that we had not made the homeless data system available to your staff. The report now makes clear that what was being requested was an actual backup of our database containing personally identifiable information. Unfortunately, despite that improvement, serious problems remain in the description of this matter and in the report overall.

**A. Why UNITY did not turn over its database of people's personal sensitive information and why LLA's attempts to seize that database was unnecessary to evaluating performance**

B.

From the report's description in the Introduction of the database UNITY did not turn over, many readers might get the false impression that UNITY had the ability to turn it over and perhaps was being unreasonable or perhaps even hiding something. But as you know from our annual federal audits, as well as an extensive "investigative audit" performed more than a decade ago pursuant to a secret complaint at a time when a heated fair housing controversy was ongoing, there has never been a whiff of impropriety in UNITY's handling of federal, state and local funds since our founding. For anyone to suggest otherwise undermines efforts to reduce homelessness – since the CoC agencies are required to provide 25 percent matching funds for our federal grants and must provide upfront funds since these grants are reimbursement-based and frequently we experience many months of delays in getting reimbursement; therefore, we and our agencies must rely substantially on donations from the public. We rely on the public's trust in our integrity in order to do this vital work. Further, the report falsely claims that because UNITY did not turn over the database, LLA was unable to evaluate outcomes of our programs.

In fact, UNITY has supplied all information requested of us by LLA pursuant to this performance audit, which has amounted to more than 11,000 pages of documents, with only one exception: we, along with every other Homeless Continuum of Care (CoC) lead agency across the state, have not complied with the LLA's highly unusual subpoena to seize the Homeless management Information System database containing personal protected information of thousands of people. We have not provided the database because a) it is not in our possession (a private company owns it and will not turn it over), b) it contains personal protected information of people, most of whom never received any HUD funds that flowed through state or local government and many of whom never received any governmental funds at all but are in the database simply because they spent a night in a wholly privately funded homeless shelter, and c) **this personal information includes highly sensitive information about people's mental and physical disabilities, whether they are members of the LGBT community, whether they have HIV, whether they have a substance use disorder, whether they are fleeing domestic violence, and other sensitive personal information, none of which we have the right to disclose.**

After consulting with HUD, all of the CoCs across the state determined this subpoena could not be complied with. The Louisiana Services network Data Consortium on behalf of the CoCs across the state filed a Petition for Declaratory Judgment in state court in Baton Rouge seeking to have the judicial system make a decision as to whether the subpoena was proper.

As you know, on Sept. 25, 2024 HUD wrote a letter to the chairman of the Legislative Audit Advisory Council expressing its concern about the LLA subpoena: "[T]he Department is very concerned about the careful protection of such information from unnecessary disclosure. If such sensitive data could be subpoenaed in this manner, without limitation to what is necessary to serve a reasonable purpose, beneficiaries and providers might limit their input into HMIS, rendering the HMIS ineffective for its intended purposes of understanding the nature of homelessness and addressing needs of individuals experiencing homelessness. Knowing such information, including the most personal of PII, may be sought at any time may also have a chilling effect on intended beneficiaries from seeking needed HUD assistance. Additionally, HUD has particular concern with the protection of certain specific PII, namely information concerning a beneficiary's federally protected characteristics, including disability status,

race, color, national origin, religion, sex (including gender identity and sexual orientation), or familial status. Disclosure of such information could lead to impermissible treatment under the various federal fair housing and civil rights laws administered by the Department.... HUD is likewise concerned with the release of information concerning a beneficiary's status as a survivor of domestic violence, dating violence, sexual assault or stalking..."

**Although the LLA attorney attempted to reach an agreement with HUD allowing access to personal protected information, the LLA did not reach any agreement with HUD. The LLA subsequently decided to withdraw the subpoenas.** Although in Appendix B your attorney described the motivation for withdrawing the subpoenas as the desire to move on with the performance audit, we find that unlikely to be the reason.

The statement that because the database was not turned over, LLA could not do any evaluation of performance of CoC programs is untrue. Virtually all national experts on homelessness would agree that you do not need client identified information to assess CoC performance. From the outset, UNITY has made available to LLA the local data relating to the HUD-verified System Performance Measures by which all CoCs' performance is evaluated, using criteria determined by the leading national experts in the field, for determination of the amount of competitive HUD funding we and the other CoCs receive annually. We have further offered, orally and in writing, to request that the HMIS administrator compile any performance data, using HMIS numbers rather than client-identified information, that LLA might wish to see. We have further urged that the LLA limit its request for personal information to clients whose HUD funds come through the state government where our contracts with the state require us to provide whatever information the state wishes to analyze. We have also suggested that LLA look at our rental payment records to further confirm how many households our CoC monthly pays rent for. LLA has declined to use any of this information. **It is inexplicable how this can be called a performance audit when reams of HUD-verified performance data have been given and none have been used by LLA.**

The LLA staff has consistently told us there are two reasons they needed to have the actual physical HMIS database: 1) that their audit standards require they see 100 percent of all original data and 2) so that they can run "cross checks" of our database with other databases of poor people which they permanently keep in the LLA office. With respect to the first justification, the audit standards are inconsistent: a) This draft audit contains several unsubstantiated allegations that I was not even asked about and that were not fully investigated to see if they were true or fair or related to anything that had any significant impact on housing the unhoused; b) the LLA staff has acknowledged that the annual audits state legislative auditors do of one another do not look at 100 percent of original data; and c) the recent performance audit of domestic violence programs and policies did not look at any personally identifiable information.

With respect to the second justification, I would encourage the LLA to consider the privacy rights of poor people to be equal to that of every other citizen whose personal information is held by the government and who may have received benefits such as disaster relief, licenses, or tax credits or deductions. No other state auditor has seized an entire HMIS system with personal protected information to the best of our knowledge.

In fact, the CoC and its longstanding partners – the City of New Orleans, Jefferson Parish, City of Kenner, State of Louisiana, local housing authorities, local behavioral health agencies, nonprofit service providers, philanthropies and business – have had numerous successes in reducing homelessness during the performance audit period that are either glossed over or ignored completely in the LLA report.

Because the audit did not address HUD’s System Performance Measures and glossed over or ignored substantial achievements, it ended up focusing on less significant matters such as the fact that in-person monitoring was not done during the pandemic. What we did appreciate was the calling of attention to the shortage of affordable rental housing as leading driver of homelessness, and we acknowledge UNITY’s need to do a better job of communicating to the public and our partners and promise to improve on that.

We will very briefly respond to the Conclusions and Recommendations in the report (we simply do not have time to point out all the inaccuracies due to the urgency of our work, but have previously called your staff’s attention to most of the inaccuracies).

## **B. Summary of Response to Recommendations**

Conclusion 2, Recommendation 3: UNITY does review each Continuum of Care provider at least annually, including all those whose funding we secure through the competitive application we write but whose grant is not subcontracted through us. Obviously most on-site monitoring had to be suspended during the pandemic, but this section of the report incorrectly implies that UNITY is doing very little to monitor and oversee agency performance, when in fact UNITY staff spend substantial time every day ensuring that CoC agencies are performing well and following the law.

Conclusion 3, Recommendation 4: This section glosses over UNITY’s plan for reducing homelessness, including sheltered homelessness. The plan created by our CoC, including local governmental officials, was so excellent it was chosen by HUD as the basis for awarding the highly competitive Unsheltered Homelessness grant. UNITY always supports our governmental partners’ efforts – New Orleans, Jefferson Parish, Kenner & the State -- to create their own plans for their political jurisdictions, in addition to having our own CoC-wide plans. We agree there is a need for more collaboration between the CoC & OHSS at a time when homelessness has become a contentious political issue.

Conclusion 3, Recommendation 6: This section erroneously states that UNITY does not conduct annual gap analyses and annual plans when we in fact do. HUD does not require any special format for those analyses and plans but they are an essential part of our annual CoC grant planning process, and now that the grant application has become biennial we will ensure that annual gap analysis and planning continues as well as improving it. We will also improve our communication about this.

Conclusion 3, Recommendation 7: Because of the LLA’s lack of knowledge of this field, this section mistakenly assumes that more sharing of client-identified information is a best practice. The LLA also mistakenly assumes that sharing client-identified information is necessary to analyze program outcomes and create long-term strategies, when national homelessness experts strongly disagree. Any specific request for increased client-level data-sharing will be evaluated on a case-by-case basis in consultation with national HMIS experts, as we have consistently done in the past. As for aggregate de-identified data

sharing, UNITY provides that to its partners upon request. We will improve our communication of how to make such requests. We cannot agree or disagree with this recommendation in the absence of a specific request.

Conclusion 4, Recommendation 8: This section contains numerous misstatements and fails to acknowledge that the permanent housing of 275 persons from encampments is a significant collaborative achievement between the City and the CoC. The conclusion is false because 1)UNITY spent 21% of the 3-year Unsheltered Homelessness grant during the first year, which is good performance considering the start-up time to hire & train staff & governmental & nonprofit subcontractors and 2) this grant is focused on all unsheltered people, not only people living in encampments, who are the minority of people experiencing unsheltered homelessness. The recommendation ignores the fact that UNITY already has two data-sharing agreements with OHSS about the encampment decommissioning, and we are happy to supply any other aggregate data reports requested. We will consider any new client-identified data-sharing requests OHSS makes and consult with national experts about it. We cannot agree or disagree with this recommendation in the absence of a specific request for a new data-sharing agreement.

Conclusion 6, Recommendation 14: This recommendation falsely assumes that ensuring that families have access to shelter after hours and on weekends is solely UNITY's responsibility. CoC funding cannot be used for operation of shelters; that is the city's responsibility. In addition, with the exception of Covenant House, most family shelters are not available to accept clients on evenings and weekends. We agree that working together, UNITY and OHSS and the family shelters should try to better ensure that families have access to shelter after hours and on weekends. Although UNITY provides staff for the Family Housing Crisis Line, the recommendation incorrectly assumes that family shelters have capacity to accept new referrals overnight and weekends. We agree that working together, UNITY and OHSS can work with shelters to increase access to shelter for families overnight and weekends.

Conclusion 7, Recommendation 17: We are not sure if the persons surveyed are aware that CoC funding decisions are made by the CoC Governing Council rather than by UNITY. We will do a better job of communicating that fact, and we will conduct listening sessions and set up a complaint system to ensure that we understand and timely respond to concerns. We will work to improve communications with providers outside of our weekly and monthly meetings with them.

### **C. Performance Measures and Data that LLA Should Have Used**

#### **How UNITY Reviews Performance**

One important outcome when reviewing performance of a CoC is whether our homeless system, and the projects funded through public dollars, is effectively assisting homeless individuals to obtain and retain housing. The New Orleans CoC has assisted over 20,000 people over the 5 years of funding reviewed in the legislative auditor's report. The biggest success of our system is the ability to assist people with disabling conditions to obtain and retain housing through Permanent Supportive Housing Programs (PSH). These programs comprise over 50% of homeless system funding and assist an average of 2814 disabled people each year with rental assistance and case management to help them remain stably housed. Our housing stability rate for this intervention is 96-98% for the past six years. Since 2019, despite the pandemic and natural disasters, the homeless response system for Greater New

Orleans assisted over 13,500 people to obtain or maintain housing. (Table: “Homeless Expenditures and Outcomes”).

Homeless individuals do not need to give up their privacy for our homeless system to evaluate program performance. Standardized reports from a provider database, are used to evaluate performance of the homeless response system, determine performance of individual projects, and compare system performance to other communities across the country that use the same format for reporting. Because the database assigns a unique identifier for each participant, standardized reports can de-duplicate client information among different programs and different periods of time, without sacrificing privacy. Aggregated reports also allow the system to compare performance of Domestic Violence programs assisting homeless individuals, without endangering the privacy of program participants. The quality of the aggregated data is maintained by a process that includes review by the database administrator, database validation measures, and through a sampling of data compared to case files. Therefore, obtaining client level data with personally identifiable information should not prevent a performance review of the homeless response system, as it was also not obtained for a performance review of domestic violence initiatives in the state.

UNITY provided the LLA with information about the performance of the homeless response system including historical data with performance on the System Performance Measures, performance data for individual projects, and the process used by UNITY to evaluate performance of funded projects. In fact, UNITY provided over 11,000 pages of documents.

The outcomes of the homeless response system were not included in a performance audit. CoCs are charged with designing a local “system” to assist sheltered and unsheltered people experiencing homelessness and providing the services necessary to help them access housing and obtain long-term stability. More broadly, CoCs are to promote community-wide planning and strategic use of resources to address homelessness; enhance coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness; and improve data collection and performance measurement. Managing and monitoring outcome performance is a key role of HUD’s Continuum of Care program as outlined in the HUD Regulations (578.7(a)(6)<sup>1</sup>). Key performance measures are based on the number of people who exit homelessness to long-term “permanent” housing, decreasing the length of time people experience homelessness, and reducing the number of people who are experiencing homelessness. There are many ways to review this system performance, including: 1) a review of the process by which UNITY performs this function, 2) a review of the outcomes of different projects in the CoC based on HMIS and comparable database generated reports that are used to review outcomes of individual projects in the CoC based on Annual Performance Reports (APRs) generated from HMIS using standardized programming specifications. 3) Comparing the local system performance to other CoCs across the country through HUD’s system performance measures and by HUD’s CoC funding competition scoring of which 30% is based on the ability of a CoC to maintain or improve upon HUD benchmarks.

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<sup>1</sup> Code of Federal Regulations Title 24 Subtitle B Chapter V Subchapter C Part 578 – Continuum of Care Program (accessed on March 6, 2025) <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578>

- 1) **UNITY's Performance Monitoring Process** evaluates and monitors outcomes of CoC and ESG funded projects, system-wide outcomes, and strategies to improve the system to reduce homelessness. This includes a range of activities undertaken by UNITY to review and improve performance of the homeless assistance projects, including projects that are not sub-recipients of UNITY. UNITY's monitoring of homeless projects is a year-round process that includes different areas of activities: Contract Management; Project Performance Ratings; Quarterly/Annual Performance Reports; System-wide performance measurement and strategies. These activities are an important corollary to the performance monitoring addressed by the LLA report and even more important to determine performance of the homeless response system.

UNITY's performance management process for CoC projects (not only sub-recipients) includes a review of: weekly utilization reports from the HMIS Administrators at VIALink; monthly reports for identified higher risk projects; quarterly review of project performance and utilization; and annual performance review prior to submission of annual performance reports with outcome and financial data that are submitted to HUD. This process is undertaken for each project during the year, taking into account each project having a different timeline due to variances in project start dates.

**On an annual basis, the CoC conducts a detailed performance analysis** of each project through the CoC application cycle. The Project Performance Analysis results in a project performance score for each renewal project calculated by examining several factors including contributions towards HUD's system performance measures to reduce homelessness, local criteria for performance benchmarks, and other local criteria developed from multiple levels of input from our member agencies, people with lived experience, and the community. Within the information provided to the LLA, the project scoring information and HMIS generated reports were included, which are used for the performance analysis as evidence of the process used to monitor program performance. In addition, this data is verified by UNITY through a sampling of case files during compliance monitoring.

**Through collaboration, UNITY also conducts activities to support providers** to improve outcomes, reinforce best practices and collaborate between agencies during weekly navigation meetings of the coordinated entry system, outreach coordination meetings, monthly meetings of PSH directors, and meetings of unsheltered project staff. Meetings of the People's Council also provide important qualitative feedback about project performance and ways to improve project activities. These meetings include reviews of quantitative data in addition to qualitative data and related information to improve performance.

- 2) **UNITY actively reviews the performance of each homeless project** by comparing data annually. Individual project goals are established to maintain or improve performance outcomes for the project type, based on the project role in the CoC, and varying outcomes for subpopulations (families, youth, survivors/DV, chronically homeless). HMIS has a standard reporting tool to generate federally accepted reports including the Annual Performance Report (APR) and the Consolidated Annual Performance and Evaluation Reports (CAPER), which assists in the evaluation of projects, including Domestic Violence projects who are prohibited from using HMIS by VAWA. These reports can be generated for any period of time and each calendar year must be submitted to HUD for all ESG and CoC funded projects.

The review of individual project performance is typically done by project type, specifically permanent supportive housing projects, rapid rehousing projects, emergency shelter and transitional housing projects and street outreach and coordinated entry projects. For the time period July 1, 2023 -June 30, 2024, the Permanent Supportive Housing Programs funded through the CoC assisted 2891 people, Rapid Rehousing Programs assisted 1076 people, Transitional Housing Programs assisted 154 people and joint component TH-RRH programs assisted 630 people. Performance of each project and subrecipient involves the review of 41 different reports for these projects. In addition to the project level data conducted annually, the data for each report submitted to HUD can be exported and/or aggregated from the Federal reporting system. The Aggregated data for Coordinated Entry and Street Outreach projects demonstrates outcomes for 4369 people served by 10 projects of which 1759 were referred to RRH or PSH, 429 moved into housing, and 154 were referred to PHA vouchers.

The table “Housing Outcomes of Each CoC Project and Project Sponsor” demonstrates the ability to cross compare same type projects (PSH in this example) for utilization and effectiveness. This information, when compared to grant funding utilization, allows UNITY to identify the most effective and efficient projects to recommend for renewal or expansion.

It is important to remember that different project types are going to have different performance outcomes based solely on the population they serve and the services they provide. The metrics used to measure the performance of a housing project type, like rapid rehousing, are significantly different than a services only project type like street outreach. UNITY is well versed in its understanding of project types and the populations they serve and uses this knowledge to effectively and deliberately evaluate the efficiency and overall impact of each project type in the larger homeless system of care.

It is also important to know that UNITY utilizes both the HMIS and comparable databases used by victim service providers to collect aggregate data concerning each project type eliminating the necessity to examine personally protected information to establish performance of these project types. UNITY offered this aggregated data it uses to examine performance of project types to the legislative auditor however the auditor focused solely on collecting the individualized personally protected data found in the HMIS, which generally is released per a participant’s consent.

3) **System performance can be compared to other areas can be done by using HUD’s System Performance Measures.** HUD’s System Performance Measures (SPM) are important measures of success for a homeless response system that is based on reducing the number of people homeless, exits to long-term housing solutions, and preventing returns to homelessness. Because the data used for these measures is standardized with HMIS data standards and reporting modules from software vendors, these measures provide a way to determine an evaluation of performance of the New Orleans homeless response system. The measures also provide a way to compare the performance to other communities across the country.

The System Performance Measures (SPM) is a set of seven key performance indicators for a homeless response system’s ability to a) reduce the number of people who are experiencing homelessness; b) reduce the length of time they are homeless; and c) prevent people from returning

to homelessness. SPM include performance for CoC and ESG funded programs, including those funded through LHC and operate in New Orleans. These reports are generated through a reporting module in HMIS and submitted to HUD on an annual basis for each federal fiscal year.<sup>2</sup> The measures can also be used to compare performance among the different CoCs across the country using publicly available historical data available on HUD’s website.

These indicators include metrics to reduce the number of people who are first-time homeless, increase system exits to long-term (permanent) housing, housing stability of people with disabling conditions. Process outcomes include the number of program participants who increase income and obtain mainstream benefits like health insurance. Local measures developed through a community-wide process and adopted by the CoC Governing Council also includes data quality standards, obtaining health insurance, and cost effectiveness.

The application for funding to HUD’s Continuum of Care program places a lot of emphasis on communities that achieve HUD benchmarks and improve performance to reduce homelessness. System performance measures have been 30% of the points available in the HUD application. These points are based on SPM reported to HUD prior to the release of the funding application which includes benchmarks and scoring for each funding cycle.

UNITY’s performance on these measures has ranged from a low score of 63% of maximum points for this section in 2019 and improved to 83% of all possible points for system performance in 2023. (No data is yet available for the FY2024-2025 application). See table “HUD Scoring of CoC Application for System Performance Measures” with a summary of information provided by HUD Debriefing Documents that UNITY provided to the LLA.

UNITY’s performance management process includes setting goals and strategies to improve system performance in efforts to reach or exceed HUD benchmarks. The table “System Performance Benchmarks” which 3 contains the system performance measure data for New Orleans that was reported in FY2021 and FY2022 for the FY2023 HUD CoC application indicating the HUD goal or benchmark needed to obtain full scoring points. New Orleans reached HUD Benchmarks for three of six performance measures to maintain a low median length of time people experience homelessness, low returns to homeless, and high rates of housing stability. New Orleans also demonstrated improvement to increased income outcomes. However, there was an increase in the

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<sup>2</sup> Programming specs for SPM (accessed March 6, 2025)

<https://www.hudexchange.info/resource/4483/system-performance-measures-tools/>

- <sup>3</sup> Source: HUD Community Planning and Development FY2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants FR-6800-N-25 Published 08/29/2025 (accessed 3/6/2025)  
[https://www.hud.gov/sites/dfiles/CPD/documents/FY2024\\_FY2025\\_CoC\\_and\\_YHDP\\_NOFO\\_FR-6800-N-25.pdf](https://www.hud.gov/sites/dfiles/CPD/documents/FY2024_FY2025_CoC_and_YHDP_NOFO_FR-6800-N-25.pdf)

number of people experiencing homeless for the first time, and an overall increase as indicated from the annual point-in-time count.

Although the CoC did not reach all benchmarks, a review of application scoring data from HUD indicates that our CoC is one of the higher performing CoCs in the country. For the time period of this review, UNITY's CoC application was scored in the top quartile of all CoC's in the country. (See table "HUD Scoring of CoC Application").

### **In Conclusion**

We agree with the report's conclusions that UNITY very much needs to improve its communications. We do very much appreciate learning that some of our providers have concerns that we did not know about, and we will reach out to address those concerns. We do feel strongly that a harmonious atmosphere in which all partners are supporting one another is vital at such a challenging time when rents are soaring and people are daily becoming homeless who were not homeless the night before as a result. We look forward to working closely with the State, City, Jefferson Parish and our sister organizations around the state in the coming months and years. We have accomplished so much together and we will continue to do so.

We appreciate the courtesy and professionalism of the LLA team who came to New Orleans to meet with us. We are grateful for the LLA's interest in doing a report about the need for affordable housing in our state, which studies show is the leading driver of homelessness.

Sincerely,

A handwritten signature in blue ink, appearing to read "Martha J. Kegel". The signature is fluid and cursive, with the first name "Martha" being the most prominent part.

Martha J. Kegel  
Executive Director

**Agency: UNITY of Greater New Orleans**

**Audit Title: Homelessness Initiatives in the City of New Orleans**

**Audit Report Number: 40230032**

**Instructions to Audited Agency:** Please fill in the information below for each recommendation. A summary of your response for each recommendation will be included in the body of the report. The entire text of your response will be included as an appendix to the audit report.

<b>Conclusion 2: The City, LHC, and UNITY have processes to monitor providers; however, most fiscal and programmatic compliance monitoring was suspended during the COVID-19 pandemic.</b>	
<i>Recommendation 3: As UNITY has resumed program monitoring, it should conduct all reviews required by its policies and procedures, including reviewing each provider at least annually.</i>	
Does Agency Agree with Recommendation? <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	
Agency Contact Responsible for Recommendation:	
<i>Name/Title: Joseph Heeren-Mueller, UNITY Director of Community Engagement</i>	
<i>Address: 2475 Canal St., Suite 300</i>	
<i>City, State, Zip: New Orleans, LA 70119</i>	
<i>Phone Number: 504-483-9300, 504-821-4496 x 1000</i>	
<i>Email: jheeren-mueller@unitygno.org</i>	
UNITY Response: UNITY does review each Continuum of Care provider at least annually, including all those whose funding we secure through the competitive application we write but whose grant is not subcontracted through us. Obviously most on-site monitoring had to be suspended during the pandemic, but this section of the report incorrectly implies that UNITY is doing very little to monitor and oversee agency performance, when in fact UNITY staff spend substantial time every day ensuring that CoC agencies are performing well and following the law.	

<b>Conclusion 3: The New Orleans CoC needs increased collaboration among the City, UNITY, and providers in order to develop and implement a cohesive strategic plan for addressing homelessness in New Orleans.</b>	
<i>Recommendation 4: OHSS and UNITY should work more collaboratively to develop a long-term strategic plan with measurable goals.</i>	
Does Agency Agree with Recommendation? <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	
Agency Contact Responsible for Recommendation:	
<i>Name/Title: Joseph Heeren-Mueller, UNITY Director of Community Engagement</i>	

<i>Address: 2475 Canal St., Suite 300</i>	
<i>City, State, Zip: New Orleans, LA 70119</i>	
<i>Phone Number: 504-483-9300, 504-821-4496 ext. 1000</i>	
<i>Email: <a href="mailto:jheeren-mueller@unitygno.org">jheeren-mueller@unitygno.org</a></i>	
<p>UNITY Response: This section glosses over UNITY's plan for reducing homelessness, including sheltered homelessness. The plan created by our CoC, including local governmental officials, was so excellent it was chosen by HUD as the basis for awarding the highly competitive Unsheltered Homelessness grant. UNITY always supports our governmental partners' efforts – New Orleans, Jefferson Parish, Kenner &amp; the State -- to create their own plans for their political jurisdictions, in addition to having our own CoC-wide plans. We agree there is a need for more collaboration between the CoC &amp; OHSS at a time when homelessness has become a contentious political issue.</p>	
<i>Recommendation 6: UNITY should conduct annual gap analyses and create annual plans.</i>	
Does Agency Agree with Recommendation? <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	
Agency Contact Responsible for Recommendation:	
<i>Name/Title: Joseph Heeren-Mueller, UNITY Director of Community Engagement</i>	
<i>Address: 2475 Canal St., Suite 300</i>	
<i>City, State, Zip: New Orleans, LA 70119</i>	
<i>Phone Number: 504-483-9300, 504-821-4496 ext. 1000</i>	
<i>Email: <a href="mailto:jheeren-mueller@unitygno.org">jheeren-mueller@unitygno.org</a></i>	
<p>UNITY Response: This section erroneously states that UNITY does not conduct annual gap analyses and annual plans when we in fact do. HUD does not require any special format for those analyses and plans but they are an essential part of our annual CoC grant planning process, and now that the grant application has become biennial we will ensure that annual gap analysis and planning continues as well as improving it. We will also improve our communication about this.</p>	
<i>Recommendation 7: UNITY should facilitate increased data-sharing among key partners, such as OHSS and some providers, to better analyze program outcomes and create long-term strategies to address homelessness.</i>	
Does Agency Agree with Recommendation? <input type="checkbox"/> Agree <input type="checkbox"/> Disagree	
Agency Contact Responsible for Recommendation:	
<i>Name/Title: Joseph Heeren-Mueller, UNITY Director of Community Engagement</i>	
<i>Address: 2475 Canal St., Suite 300</i>	
<i>City, State, Zip: New Orleans, LA 70119</i>	
<i>Phone Number: 504-483-9300, 504-821-4496 x 1000</i>	
<i>Email: <a href="mailto:jheeren-mueller@unitygno.org">jheeren-mueller@unitygno.org</a></i>	
<p>UNITY Response: Because of the LLA's lack of knowledge of this field, this section mistakenly assumes that more sharing of client-identified information is a best practice. The LLA also mistakenly assumes that sharing client-identified information is necessary to analyze program outcomes and create long-term strategies, when national homelessness experts strongly disagree. Any specific request for increased client-level data-sharing will be evaluated on a case-by-case basis in consultation with national HMIS experts, as we have consistently done in the past. As for aggregate de-identified data sharing, UNITY provides that to its partners upon request. We will improve our communication of how to make such requests. We cannot agree or disagree with this recommendation in the absence of a specific request.</p>	

**Conclusion 4: According to OHSS and UNITY, 275 individuals have been housed through targeted encampment decommissioning. Overall, OHSS's process for decommissioning encampments generally followed city ordinances and best practices. As of December 2024, UNITY spent \$2.3 million (15.4%) of the \$15.0 million three-year special HUD grant available for addressing encampments. In addition, various external circumstances impacted OHSS's progress.**

*Recommendation 8: OHSS and UNITY should develop a data-sharing agreement that increases transparency and allows for determining overall outcomes from the encampment decommissioning process.*

Does Agency Agree with Recommendation?  Agree  Disagree

Agency Contact Responsible for Recommendation:

*Name/Title: Joseph Heeren-Mueller*

*Address: 2475 Canal St., Suite 300*

*City, State, Zip: New Orleans, LA 70119*

*Phone Number: 504-821-4496 ext. 1000*

*Email: [jheeren-mueller@unitygno.org](mailto:jheeren-mueller@unitygno.org)*

UNITY Response: This section contains numerous misstatements and fails to acknowledge that the permanent housing of 275 persons from encampments is a significant collaborative achievement between the City and the CoC. The conclusion is false because 1)UNITY spent 21% of the 3-year Unsheltered Homelessness grant during the first year, which is good performance considering the start-up time to hire & train staff & governmental & nonprofit subcontractors and 2) this grant is focused on all unsheltered people, not only people living in encampments, who are the minority of people experiencing unsheltered homelessness. The recommendation ignores the fact that UNITY already has two data-sharing agreements with OHSS about the encampment decommissioning, and we are happy to supply any other aggregate data reports requested. We will consider any new client-identified data-sharing requests OHSS makes and consult with national experts about it. We cannot agree or disagree with this recommendation in the absence of a specific request for a new data-sharing agreement.

**Conclusion 6: Family coordinated entry for shelters is not always accessible for families in need because it is not always easy for them to contact UNITY. In addition, UNITY did not always conduct annual evaluations and surveys of coordinated entry as required by HUD and UNITY's policy.**

*Recommendation 14: UNITY should ensure that families have access to shelter after hours and on weekends.*

Does Agency Agree with Recommendation?  Agree  Disagree

Agency Contact Responsible for Recommendation:

*Name/Title: Joseph Heeren-Mueller, Director of Community Engagement*

*Address: 2475 Canal St., Suite 300*

*City, State, Zip: New Orleans, LA 70119*

*Phone Number: 504-483-9300, 504-821-4496 ext. 1000*

*Email: [jheeren-mueller@unitygno.org](mailto:jheeren-mueller@unitygno.org)*

UNITY Response: This recommendation falsely assumes that ensuring that families have access to shelter after hours and on weekends is solely UNITY's responsibility. CoC funding cannot be used for operation of shelters; that is the city's responsibility. In addition, with the exception of Covenant House, most family shelters are not available to accept clients on evenings and weekends. We agree that working together, UNITY and OHSS and the family shelters should try to better ensure that families

have access to shelter after hours and on weekends. Although UNITY provides staff for the Family Housing Crisis Line, the recommendation incorrectly assumes that family shelters have capacity to accept new referrals overnight and weekends. We agree that working together, UNITY and OHSS can work with shelters to increase access to shelter for families overnight and weekends.
<i>Recommendation 15: UNITY should ensure it evaluates its coordinated entry process annually.</i>
Does Agency Agree with Recommendation? <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Agency Contact Responsible for Recommendation:
<i>Name/Title: Joseph Heeren-Mueller</i>
<i>Address: 2475 Canal St., Suite 300</i>
<i>City, State, Zip: New Orleans, LA 70119</i>
<i>Phone Number: 504-483-9300, 504-821-4496 ext. 1009</i>
<i>Email: jheeren-mueller@unitygno.org</i>

<b>Conclusion 7: Providers we surveyed indicated that the City and UNITY need to improve communication, including better availability and responsiveness to providers, clarity regarding policies and procedures, and more timely reimbursements.</b>
<i>Recommendation 17: UNITY should improve its communication with providers.</i>
Does Agency Agree with Recommendation? <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Agency Contact Responsible for Recommendation:
<i>Name/Title: Joseph Heeren-Mueller, UNITY Director of Community Engagement</i>
<i>Address: 2475 Canal St., Suite 300</i>
<i>City, State, Zip: New Orleans, LA 70119</i>
<i>Phone Number: 504-483-9300, 504-821-4496 ext. 1009</i>
<i>Email: jheeren-mueller@unitygno.org</i>
UNITY Response: We are not sure if the persons surveyed are aware that CoC funding decisions are made by the CoC Governing Council rather than by UNITY. We will do a better job of communicating that fact, and we will conduct listening sessions and set up a complaint system to ensure that we understand and timely respond to concerns. We will work to improve communications with providers outside of our weekly and monthly meetings with them.
<i>Recommendation 19: UNITY should clearly communicate resources for homelessness services to the public, such as on their website.</i>
Does Agency Agree with Recommendation? <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Agency Contact Responsible for Recommendation:
<i>Name/Title: Joseph Heeren-Mueller, UNITY Director of Community Engagement</i>
<i>Address: 2475 Canal St., Suite 300</i>
<i>City, State, Zip: New Orleans, LA 70119</i>
<i>Phone Number: 504-493-9300, 504-821-4496 x 1009</i>
<i>Email: jheeren-mueller@unitygno.org</i>





Administrative Mailing Address:

c/o Board Chair  
Sarah B. Johnson  
1515 Jackson Street  
Monroe, Louisiana 71202

Mar. 12, 2025

The Honorable Michael J. Waguespack, CPA  
Louisiana Legislative Auditor  
1600 N. 3rd Street  
Baton Rouge LA 70802  
mwag@lla.la.gov

Dear Mr. Waguespack:

Thank you for all you and the entire Louisiana Legislative Auditor (LLA) program do to improve the lives of Louisiana citizens! Your work holds our state accountable for how we serve our citizens as well as how we steward public funds we are entrusted for that purpose.

It is in light of the importance of that work that we, the Board of Directors of Louisiana Services Network Data Consortium (LSNDC) who are among Louisiana's foremost experts in the use of data to address homelessness, offer the following information.

**These are two key types of data to assess the performance of homeless services as a system of care in Louisiana: System Performance Measures and cost-effectiveness calculated as defined by the U.S. Dept. of Housing & Urban Development (HUD). These data items are tracked carefully and reported annually to HUD, other funders, Boards of Directors, communities, etc.**

LSNDC is a nonprofit coordinating body formed following Hurricane Katrina to better coordinate data tracking homelessness across Louisiana. Representatives include two persons from each region's Continuum of Care, a community-, state- and federally designated homeless services coordinating body and conduit of federal HUD funding for homelessness. (Here is a map to get more info about the state's seven CoCs: <https://laboscoc.org/housing-and-services>)

The state also participates in LSNDC via Louisiana Housing Corp. which also participates in LSNDC meetings although they hold no Board seats. When LHC needs statewide data, they notify LSNDC which provides it to them.

LSNDC has been a participant in LLA's performance audit of homeless services in Louisiana, joined as a plaintiff in the legal actions to challenge LLA's demand for raw HMIS data including legally protected information. In that role, LSNDC has seen LLA's data requests via subpoenas and court filings as well as our communicating directly with LLA staff via various Zoom calls, email, and other communications. At no time did LLA's data requests ask for these key quantitative measures used to assess the performance of individual homeless programs and the homeless services system as a whole. Indeed, these measures determine to a large extent what programs receive HUD funds in Louisiana in Washington DC. LLA should be made aware of them.

System Performance Measures: The key indicator of success of any system is whether it reduces the problems it is charged with solving. For homeless services, the measures are System Performance Measures, changes in key indicators that people are truly being assisted to exit homelessness, that services provided actually work, and that

those services are cost-effective. These measures were approved by Congress and passed into law in 2012, as follows:

From: HUD Exchange: System Performance Measures at

<https://www.hudexchange.info/programs/coc/system-performance-measures/#guidance>

*A critical aspect of the **McKinney-Vento Homeless Assistance Act**, as amended, is a focus on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community. To facilitate this perspective the Act now requires communities to measure their performance as a coordinated system, in addition to analyzing performance by specific projects or project types.*

*The Act has established a set of selection criteria for HUD to use in awarding CoC funding in section 427 that require CoCs to report to HUD their system-level performance. The intent of these selection criteria are to encourage CoCs, in coordination with ESG Program recipients and all other homeless assistance stakeholders in the community, to regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress to HUD.*

HUD homeless funds including the Continuum of Care Grant Program (FR-6800-N-25) and the Emergency Solutions Grant Program (ESG CFDA 14.231), collectively the backbone of homeless services in the U.S., are distributed based in part on how each CoC region and program proposed for funding are performing indicated by these measures. You can see this for yourself in the 2024/5 Notice of Funding Opportunity (NOFO):

*From **U.S. Department of Housing and Urban Development**, Community Planning and Development, FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants FR-6800-N-25:*

***(4) Improving System Performance.** CoCs should be assessing the performance of all homelessness projects using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations). CoCs should review all projects eligible for renewal under this FY 2024 – 2025 CoC NOFO to determine their effectiveness in serving people experiencing homelessness, including their cost-effectiveness. The CoC Competition includes several options to help CoCs improve their effectiveness, including reallocation, expansion, and transition grants, and CoC's should take advantage of these options to improve their overall performance. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.*

There is attached a summary of how System Performance Measures are calculated.

The data requests from LLA did not ask for or appear to give any weight to the System Performance Measures which tell the tale – did a program or system really achieve the desired outcome.

Cost-effectiveness: Further, LLA's data requests did not ask for historic cost-effectiveness data for each CoC region and program, nor how that information is calculated. Cost effectiveness is calculated as the total cost of a project or service divided by the number of positive outcomes. A positive outcome is defined in general for homeless services as how many people are rehoused in permanent housing the end of their participation in a homeless program. There are both local and national measures of success available over time. Programs and CoCs collect and monitor these annually. These data are all part of the Annual Performance Report that each grantee provides to HUD as well as to the CoC. CoCs also include it in their annual applications for homeless assistance, a copy of which is posted on their websites.

Based on information provided to some of Louisiana's seven CoCs by LLA, we gather that LLA is preparing a performance report about homeless services in the state. Parties far and wide including the Louisiana Legislature and the Governor, will use that report as a blueprint of funding and effectiveness. If you have not included the measures described above in that report, then those parties will not have the full set of pertinent facts before them.

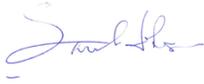
We are sure that you will mind greatly issuing a report without the key measures that Congress uses to allocate funding. We who use data to analyze how well Louisiana is addressing homelessness mind greatly that our state's citizens will be impacted by decisions based on incomplete information.

We are also delighted that LLA is looking ahead, according to an email from Kristen Jacobs, Senior Performance Auditor, LLA, "to focusing our resources on conducting audits addressing the root causes of homelessness, such as affordable housing in the state." That would be the most impactful thing the state could do to address homelessness!

We, the Board of LSND, respectfully request that you require any program(s) and systems of care addressed in LLA's forthcoming performance audit to provide the data elements the System Performance measures (the most current are 2024's) and the cost effectiveness data used in the 2024 CoC Competition. We are confident that anyone who uses LLA's report will know that they have all the pertinent information before them to make decisions.

As we of all parties know, good data is the basis for good decisions needed to end homelessness for our citizens!

Sincerely,

A handwritten signature in blue ink, appearing to read "Sarah B. Johnson".

Sarah B. Johnson, MBA, CFRE  
Board Chair, LSND

Cc via email:

Kristen Jacobs, CPA, CGAP, MA, Senior Performance Auditor, LLA  
LSND Board of Directors

19TH JUDICIAL DISTRICT COURT  
PARISH OF EAST BATON ROUGE  
STATE OF LOUISIANA

LOUISIANA SERVICES NETWORK \* NUMBER: 752,676  
DATA CONSORTIUM, ET AL \*  
VERSUS \* SECTION: "22"  
MICHAEL J. WAGUESPACK, in his \*  
capacity as the LOUISIANA LEGISLATIVE \*  
AUDITOR, and RODNEY WAYNE \*  
SCHAMERHORN, in his capacity as \*  
CHAIRMAN OF THE LOUISIANA \*  
LEGISLATIVE AUDIT ADVISORY \*  
COUNCIL \*

**SECOND AMENDED MOTION TO QUASH SUBPOENAS DUCES TECUM**

NOW INTO COURT, through undersigned counsel, come Plaintiffs, Louisiana Services Network Data Consortium ("LSNDC"), Acadiana Regional Coalition on Homelessness and Housing ("ARCH") Lafayette regional CoC), Central Louisiana Homeless Coalition ("CENLA") Alexandria regional CoC), HOME Coalition (Monroe regional CoC), HOPE Connections (Shreveport regional CoC), Northlake Homeless Coalition (Slidell regional CoC), and UNITY of Greater New Orleans (NOLA/Jefferson CoC) (collectively, "Plaintiffs"), all of whom are private not-for-profit organizations operating in the state of Louisiana. In a Judgment dated December 2, 2024, the Court granted Defendants' Exception of Non-Joinder and ordered Plaintiffs to amend their Motion to Quash Subpoena Duces Tecum (and their Petition for Declaratory Judgment) to name as a defendant the Honorable Legislature of the State of Louisiana, to be served on the Speaker of the Louisiana House of Representatives and the President of the Louisiana Senate. Plaintiffs now submit this Second Amended Motion to Quash Subpoena Duces Tecum to name the Honorable Legislature of the State of Louisiana as an additional defendant herein.

For the reasons set out more fully in the accompanying *Memorandum in Support* attached hereto, Plaintiffs move to quash the Subpoenas *Duces Tecum* issued on or about August 3, 2024 to Plaintiffs herein.

Respectfully submitted,  
**TAYLOR, PORTER, BROOKS & PHILLIPS L.L.P.**

By \_\_\_\_\_  
John Stone Campbell III, Bar # 23674  
Peyton T. Gascon, Bar # 40369  
P.O. Box 2471  
Baton Rouge, LA 70821-2471  
Telephone: (225) 387-3221  
Facsimile: (225) 346-8049  
Email: johnstone.campbell@taylorporter.com  
peyton.gascon@taylorporter.com

***Attorneys for Plaintiffs***

**CERTIFICATE**

I hereby certify that a copy of the above and foregoing was this date served on all known counsel of record via e-mail.

Baton Rouge, Louisiana, this 18<sup>th</sup> day of December, 2024.



John Stone Campbell II

19TH JUDICIAL DISTRICT COURT

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

LOUISIANA SERVICES NETWORK  
DATA CONSORTIUM, ET AL

\* NUMBER: 752,676

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\* SECTION: "22"

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VERSUS

MICHAEL J. WAGUESPACK, in his  
capacity as the LOUISIANA LEGISLATIVE  
AUDITOR, and RODNEY WAYNE  
SCHAMERHORN, in his capacity as  
CHAIRMAN OF THE LOUISIANA  
LEGISLATIVE AUDIT ADVISORY  
COUNCIL

**RULE TO SHOW CAUSE**

Considering the *Motion to Quash Subpoenas Duces Tecum* filed on behalf of Plaintiffs, Louisiana Services Network Data Consortium, Acadiana Regional Coalition on Homelessness and Housing ((“ARCH”) Lafayette regional CoC), Central Louisiana Homeless Coalition ((“CENLA”) Alexandria regional CoC), HOME Coalition (Monroe regional CoC), HOPE Connections (Shreveport regional CoC), Northlake Homeless Coalition (Slidell regional CoC), and UNITY of Greater New Orleans (NOLA/Jefferson CoC),

**IT IS HEREBY ORDERED** that Michael J. Waguespack, in his official capacity as the Louisiana Legislative Auditor, Rodney Wayne Schamerhorn, in his capacity as Chairman of the Louisiana Legislative Audit Advisory Council, and the Honorable Legislature of the State of Louisiana, through the Honorable Cameron Henry, President of the Louisiana Senate, and the Honorable Phillip R. DeVillier, Speaker of the Louisiana House of Representatives shall appear and show cause on the \_\_\_ day of \_\_\_\_\_, 2025 at \_\_\_\_\_ o'clock \_\_.m. why the Subpoenas *Duces Tecum* should not be quashed.

Baton Rouge, Louisiana, this \_\_\_\_\_ day of \_\_\_\_\_, 202\_\_.

\_\_\_\_\_  
Honorable Beau Higginbotham  
Judge, 19<sup>th</sup> Judicial District Court

**PLEASE SERVE:**

1. The Honorable Michael J. Waguespack  
Louisiana Legislative Auditor  
1600 North Third Street  
Baton Rouge, LA 70802

2. The Honorable Rodney Schamerhorn  
Chair, Louisiana Legislative Audit Advisory Council  
1600 North Third Street  
Baton Rouge, LA 70802
  
3. The Honorable Liz Murrill  
Louisiana Attorney General  
1885 North Third Street  
Baton Rouge, LA 70802
  
4. The Louisiana State Legislature,  
Through the President of the Louisiana Senate:  
  
The Honorable Cameron Henry  
2573 Metairie Road, Suite C  
Metairie, LA 70001
  
5. The Louisiana State Legislature,  
Through the Speaker of the Louisiana House of Representatives:  
  
The Honorable Phillip R. DeVillier  
439 Highway 758  
Eunice, LA 70535

19TH JUDICIAL DISTRICT COURT

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

LOUISIANA SERVICES NETWORK  
DATA CONSORTIUM, ET AL

\* NUMBER: 752,676

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\* SECTION: "22"

\*

VERSUS

\*

MICHAEL J. WAGUESPACK, in his  
capacity as the LOUISIANA LEGISLATIVE  
AUDITOR, and RODNEY WAYNE  
SCHAMERHORN, in his capacity as  
CHAIRMAN OF THE LOUISIANA  
LEGISLATIVE AUDIT ADVISORY  
COUNCIL

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**MEMORANDUM IN SUPPORT OF SECOND AMENDED  
MOTION TO QUASH SUBPOENAS DUCES TECUM**

**MAY IT PLEASE THE COURT:**

Plaintiffs, Louisiana Services Network Data Consortium ("LSNDC"), Acadiana Regional Coalition on Homelessness and Housing ((("ARCH") Lafayette regional CoC), Central Louisiana Homeless Coalition ((("CENLA") Alexandria regional CoC), HOME Coalition (Monroe regional CoC), HOPE Connections (Shreveport regional CoC), Northlake Homeless Coalition (Slidell regional CoC), and UNITY of Greater New Orleans (NOLA/Jefferson CoC) (collectively, "Plaintiffs"), move to quash the Subpoenas *Duces Tecum* issued to Plaintiffs on or about August 3, 2024, on the following grounds:

**I. INTRODUCTION**

Beginning in early 2024, the Louisiana Legislative Auditor (the "LLA" or the "Auditor") wrote to one or more Plaintiffs and claimed that:

"State law (LSA RS 24:513(D)(4)) directs the Louisiana Legislative Auditor to conduct performance audits, program evaluations and other studies to enable that the Legislature and its committees to evaluate the efficiency, effectiveness, and operations of state programs and activities. In accordance with these legislative mandates, we have scheduled a performance audit of the U.S. Department of Housing and Urban Development's [CoCs]..."

(emphasis added). A copy of the LLA's letters to Plaintiffs UNITY and ARCH are attached hereto as **Exhibit A**.

On or about August 3, 2024, the LLA and the Louisiana Legislative Audit Advisory Council ("LAAC") issued the Subpoenas *Duces Tecum* attached hereto as **Exhibit B, in globo**. Claiming authority pursuant to Article III, § 7 of the Louisiana Constitution and La. R.S.

24:513(M)(1), the Legislative Auditor commanded Plaintiffs to produce, among other things, the following documents:

- **SQL backup of HMIS for [all Plaintiffs]**
- **Documentation of HMIS layout, structure, contents, tables, fields, etc., such as a data dictionary and technical manuals, if another one exists besides the publicly available one**
- **Individual client files, including but not limited to those containing Personal Identifiable Information (PII) and Personal Protected Information (PPI), as needed to verify data entered into HMIS**
- **Individual payment agreement between [Plaintiffs] and WellSky**

As a fundamental matter, the LLA lacks the authority to audit Plaintiffs' performance. Even if the LLA does have that authority, such audit must be limited to the performance of state programs. Plaintiffs concede that they are "quasi public agencies" and "local auditees" within the meaning of La. R.S. 24:513 and are thus subject to audit by a certified public accountant. The LLA has not claimed or demonstrated the presence of circumstances requiring Plaintiffs to be audited by the LLA itself. Still, such audit must be financial in nature, not performance-based.

Despite the LLA's inherent lack of authority to audit Plaintiffs, in the spirit of cooperation, Plaintiffs worked with the Auditor and staff to satisfy the Auditor's requests. Some Plaintiffs provided the individual payment agreement(s) with WellSky, financial transaction data for HUD grant programs, and supporting documentation for those transactions. Plaintiffs also provided the location of publicly available HMIS data dictionaries and technical manuals.

All Plaintiffs steadfastly objected, however, to Defendants' commanded production of (1) the SQL backup of HMIS, and (2) individual client files containing PII and PPI. Plaintiffs lack the ability and authority to produce the "SQL backup of HMIS" as requested by Defendants. The "SQL backup" is not in Plaintiffs' possession, but rather is in the possession of WellSky – a wholly private entity. Furthermore, upon information and belief, the "SQL backup" contains proprietary information owned by WellSky, and Plaintiffs are bound by contract to not disclose such information.

As to "individual client files" containing PPI and PII, Plaintiffs lack the authority to disclose such information. The overwhelming majority of that information within the HMIS system belongs to clients who were never serviced by the Plaintiffs herein. Rather, that data was collected and recorded by other CHOs (separate programs and/or federal agencies) that also utilize the relevant HMIS system. This is a vast amount of confidential and privileged data belonging to

individuals that never provided such information to Plaintiffs. While some client PPI data is entered into HMIS pursuant to contracts between Plaintiffs and various federal agencies and sub-agencies that provide services to those clients, Plaintiffs and other parties are still precluded from disclosing such client data.

Even as to those clients who actually received services from Plaintiffs and provided the requisite information associated with such services, Plaintiffs still lack the authority to disclose the files of those clients. Plaintiffs' privacy policies, disclosure forms, and other agreements with their clients do not allow for the disclosure of the entirety of those clients' files, especially those clients' medical records, disability records, substance use records, domestic violence records, unaccompanied youth information, and HIV/AIDS status contained therein. Such information is protected from disclosure by federal and state law.

Put simply, Defendants seeks to use Plaintiffs' ability to access the HMIS database in order to force Plaintiffs to turn over all information contained within that database. This includes the names, social security numbers, dates of birth, medical records, and other private protected information of over 200,000 Louisiana citizens – most of whom are no longer homeless. Many of these individuals were clients of private not-for-profit charities who participate in HMIS, including but not limited to Volunteers of America, Catholic Charities, Easter Seals, Goodwill Industries, National Alliance on Mental Illness (NAMI), Travelers Aid Society, Covenant House, DePaul USA, Odyssey House Louisiana, Bridge House/Grace House, New Orleans Women and Children's Shelter, Crescent Care/No AIDS Task Force, and numerous others.

Plaintiffs lack the authority to provide such information. More importantly, Defendants lack the authority to force Plaintiffs to provide such information.

**A. ARGUMENT**

**1. Defendants lack the authority to demand that Plaintiffs provide the information requested in the Subpoenas *Duces Tecum*.**

As a fundamental matter, the LLA is not authorized to conduct a “performance audit” of Plaintiffs. La. R.S. 24:513(D)(4) provides that the Auditor “shall conduct performance audits, program evaluations, and other studies as are needed to enable the legislature and its committees to evaluate the efficiency, effectiveness, and operation of state programs and activities” (emphasis added). Thus, the LLA's power to conduct a “performance audit” is strictly limited to “state programs and activities.”

The limitation of the LLA’s performance audit power in La. R.S. 24:513(D)(4) aligns with a similar limitation found in La. R.S. 24:522, “Louisiana Performance Audit Program.” Subsection 522(C) compels the LLA to “provide the legislature with an evaluation and audit of the functions and activities of the agencies of state government” (emphasis added). Subsection 522(B) defines “state agency” as “any state agency, office, department, board, commission, institution, division, committee, program, or legal entity, heretofore existing or hereafter created within the legislative or executive branch of state government...”. Plaintiffs herein are not “state programs and activities” within the meaning of La. R.S. 24:513(D)(4)(a), nor are Plaintiffs “state agencies” within the meaning of La. R.S. 24:522. The LLA thus lacks the power or authority to conduct a “performance audit” of Plaintiffs.

Even if the LLA could audit Plaintiffs’ “performance,” such audit must be limited to information “needed to enable the legislature and its committees to evaluate the efficiency, effectiveness, and operation of state programs and activities.” La. R.S. 24:513(D)(4)(a) (emphasis added). The trove of data demanded by the LLA, however, includes private protected information of clients who never participated in any state program. The overwhelming majority of the more than 200,000 “individual client files” demanded by the LLA belong to individuals whose private protected information was entered into HMIS pursuant to federal programs and activities, funded by federal dollars that did not pass through state or local government. These clients were not served via “state programs and activities” within the meaning of La. R.S. 24:513(D)(4) or “agencies of state government” within the meaning of La. R.S. 24:522. The LLA has no authority to audit the performance of these programs, and thus has no right to the files of individuals serviced by these programs.

Thus, the “individual client files” demanded by Defendants cannot fall within the LLA’s performance audit authority – if any such authority exists at all. Moreover, it is unclear how the medical records, disability records, substance use records, unaccompanied youth information, and HIV/AIDS status of hundreds of thousands of federal program participants is “needed to enable the legislature and its committees to evaluate the efficiency, effectiveness, and operation of state programs and activities.”

Plaintiffs do not contend that they are totally immune from the LLA’s authority. Rather, Plaintiffs concede that they are “quasi public agencies” within the meaning of La. R.S. 24:513(A)(1)(b)(iv), as Plaintiffs are not-for-profit organizations that receive or expend local or

state assistance. Furthermore, because Plaintiffs are “not included within the annual comprehensive financial reports required pursuant to [La.] R.S. 39:80,” Plaintiffs are considered “local auditees” within the meaning of Subsection 513(A)(3). As “local auditees,” La. R.S. 24:513(A)(3) provides that Plaintiffs “shall be audited or reviewed by licensed certified public accountants...”. Indeed, Plaintiffs are audited each year by a licensed certified public accountant, and the results of said audits are given to the LLA. Plaintiffs are also reviewed by HUD each year. Yet, neither HUD nor the state auditors have ever sought to review the trove of confidential and privileged information the LLA now demands.

The LLA itself may only audit or investigate a local auditee in those instances expressly enumerated in Subsection La. R.S. 24:513(A)(4)(a)(i)-(vi). The only instance which could possibly be present here is if “[i]n the opinion of the legislative auditor and the Legislative Audit Advisory Council the best interest of the state of Louisiana would be served by his audit of the local auditee.” Subsection 513(A)(4)(a)(vi). This opinion or any evidence in support thereof has never been expressed or provided to Plaintiffs.

Even if the LLA has the authority to audit Plaintiffs under La. R.S. 24:513(A)(4)(a)(vi), that audit is limited to the authority granted in Subsection 513(A)(1)(a). This includes the authority to “compile financial statements and to examine, audit, or review the books and accounts” of Plaintiffs. The statute further provides that the LLA “shall have access to and be permitted to examine” all of Plaintiffs’ records. Neither of these statutory grants of authority, however, empower the LLA to obtain what it currently demands. The authority to “access,” “compile,” “examine,” and “review” records is substantively different than obtaining perpetual possession and control over the private protected information of hundreds of thousands of individuals.

In sum, the LLA lacks the authority to audit Plaintiffs’ performance, and further lacks the authority to personally audit Plaintiff in any manner. If such performance audit authority does exist, it must be limited solely to state programs as per La. R.S. 24:513(D)(4) and La. R.S. 24:522. If the LLA has the authority to audit Plaintiffs pursuant to Subsection 513(A)(4)(a)(vi), such audit is limited to the authority granted in 513(A)(1)(a). Either way, if any audit authority exists, it does not extend to the seizure of over 200,000 “individual client files” containing private and privileged data collected pursuant to federal programs.

**2. HUD privacy regulations preclude Plaintiffs from disclosing individual client files within the HMIS system.**

Each CoC is compelled by federal law to maintain an HMIS system for recording and analyzing client, service, and housing data. The specific data elements currently required to be maintained within an HMIS are set forth by HUD in its *2024 HMIS Data Standards Manual* and *CoC Program HMIS Manual*. HMIS Universal Data Elements (“UDEs”) are elements required to be collected by all projects participating in HMIS, regardless of funding source. The UDEs required to be collected for every client that engages with a project participating in HMIS include: (1) Name; (2) Social Security Number; (3) Date of Birth; (4) Race and Ethnicity; (5) Gender; (6) Veteran Status; (7) Disabling Conditions; (8) Project Start and Exit Dates; (9) Destination; (10) Relationship to Head of Household; (11) Program Enrollments; (12) Housing Move-in Date; and (13) Prior Living Situation. *See* HUD 2024 HMIS Data Standards Manual, p. 48 *and* CoC Program HMIS Manual, p. 11.

Furthermore, to meet the statutory and regulatory requirements of federally funded programs using HMIS, additional data elements are required for different funding sources. Program Specific Data Elements (“PSDEs”) are elements that are required by at least one of the HMIS Federal partner Programs. *See* HUD 2024 HMIS Data Standards Manual, p. 77. Common PSDEs required to be collected by CoCs and other federally funded programs using HMIS include: (1) Income and Sources; (2) Non-Cash Benefits; (3) Health Insurance; (4) Physical Disability; (5) Developmental Disability; (6) Chronic Health Condition; (7) HIV/AIDS Status; (8) Mental Health Disorder; (9) Substance Use Disorder; (10) Domestic Violence; (11) Current Living Situation; (12) Date of Engagement; (13) Coordinated Entry Assessment and Event; Moving On Assistance Provided; (14) Translation Assistance Needed; (15) Sexual Orientation; and (16) Housing Assessment at Exit. *See* CoC Program HMIS Manual, p. 13.

Due to the confidential and privileged nature of the collected data outlined above, Congress requires participating programs to ensure that HMIS is operated according to standards developed by the Secretary of HUD that provide for, among other requirements, encryption of data collected, criminal and civil penalties for unlawful disclosure of data, and any other standards the Secretary deems necessary. 42 U.S.C. § 11360(a)(f)(3)(D). Each CoC is required to approve a “privacy plan, security plan, and data quality plan for the HMIS” and ensure HMIS is administered in compliance with the requirements prescribed by HUD. 24 C.F.R. § 578.7(b). HUD further developed and published privacy and security requirements for HMIS through its 2004 Data and Technical

Standards Notice (the “HUD Notice”). The HUD Notice provides baseline standards required of any Covered Homeless Organization (“CHO”) that records, uses, or processes protected personal information (“PPI”) on homeless clients for an HMIS. *Id.* at 45927-45928. The HUD Notice further identifies additional protocols or policies that organizations may choose to adopt to enhance further the privacy and security of information collected through HMIS. *Id.*

The HUD Notice defines “protected personal information” (“PPI”) as “any information maintained by or for a Covered Homeless Organization about a living homeless client or individual that: (1) Identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual.” *Id.* at 45928. The HUD Notice authorizes CHOs to use or disclose PPI only if the use or disclosure is allowed by the HUD Notice and is described in the CHOs’ own privacy notice. All CHOs are required to publish a privacy notice describing policies and practices for the processing of PPI and must provide a copy of its privacy notice to any individual upon request. *Id.* at 45930. The privacy notice must contain all additional privacy protections adopted by the CHOs in its privacy notice, thereby committing the CHO to additional privacy protections consistent with HMIS requirements. *Id.* at 45929-45930.

Except for first party access to information and any required disclosures for oversight of compliance with HMIS privacy and security standards, all uses and disclosures of PPI are “*permissive and not mandatory*” (*emphasis added*). *Id.* at 45930. This means that uses and disclosures not specified in a CHO’s privacy notice are permitted only with the consent of the individual or when required by law. *Id.* Finally, the HUD Notice requires CHOs to comply with federal, state, and local laws that require additional confidentiality protections. *Id.* at 45929. In doing so, HUD recognizes that state laws may have stronger confidentiality provisions and provides that state confidentiality law would prevail in the event of a conflict.

Taken together, because Plaintiffs record, use, and/or process PPI for an HMIS, they are considered to be CHOs subject to the HMIS Privacy Standards provided in the HUD Notice. Each Plaintiff also maintains a privacy policy and provides each of their clients with a disclosure consent form (LSNDC notices and disclosures attached hereto as **Exhibit C, *in globo***). Thus, Plaintiffs may disclose client PPI only if the use or disclosure is allowed by the HUD Notice and is described in the privacy notice and disclosure forms. Even then, except for first party access to information

and any required disclosures for oversight of compliance with HMIS privacy and security standards, all uses and disclosures of PPI are “*permissive and not mandatory.*”

Defendants’ demand for the entirety of the HMIS database does not constitute “first party access” or “oversight of compliance with HMIS privacy and security standards.” Disclosure of the information demanded by the Auditor is therefore “*permissive and not mandatory,*” and thus consent of the individual clients must be obtained before their PPI can be disclosed. Put simply, Plaintiffs cannot be compelled to disclose PPI of their clients contained within the HMIS system.

Significantly, however, the “individual client files” demanded in the Subpoenas *Duces Tecum* includes much more than just “PPI” as defined in the HUD Notice. Each individual client’s file includes that client’s medical records, disability records, substance use records, domestic violence records, unaccompanied youth records, and HIV/AIDS status. Not only is such information protected from disclosure by various federal and state laws and regulations, but it is also further protected by Plaintiffs’ own privacy and disclosure standards (*see* Exhibit C). These standards provide that the client’s medical records, disability records, substance use records, domestic violence records, unaccompanied youth information, and HIV/AIDS status will not be disclosed. By representing to clients that such information will not be disclosed, Plaintiffs have adopted additional privacy protections over such information. Per the HUD Notice, disclosure of such information can only be made with the consent of the individual.

The additional privacy protections adopted by Plaintiffs are rooted in federal laws and regulations prohibiting the disclosure of that information. Such federal laws include, but are not limited to: 5 U.S.C. § 522a (Privacy Act); 42 U.S.C. § 1320d-9 (Health Insurance Portability and Accountability Act (“HIPAA”)); 42 C.F.R Part 2 (Confidentiality of patient records created by federally assisted programs for the treatment of substance use disorders); 28 C.F.R 90.4(b)(2)(iii) (Violence Against Women Act (“VAWA”) Confidentiality Provision); 42 U.S.C § 5701, et seq. (Runaway and Homeless Youth Act (“RHY”); 42 U.S.C. § 12905(e) and 24 C.F.R. § 574.440 (Housing Opportunities for Persons with AIDS (“HOPWA”) confidentiality provisions).

If Plaintiffs were to turn over “individual client files” as demanded by the Subpoenas, Plaintiffs would breach the additional privacy protections they have adopted, along with the various other federal laws and regulations cited above. This amounts to a breach of federal HUD regulations and would thus place Plaintiffs’ receipt of necessary government funds at risk. As the privacy standards for HMIS were established by HUD pursuant to authority granted by Congress,

failure to comply with those standards can put collaborative applicants in violation and may trigger “remedial action” including “designating another body as a collaborative applicant or permitting other eligible entities to apply directly for grants.” 42 U.S.C. § 11360(a)(c).

**3. Plaintiffs lack the authority to disclose all “individual client files” contained within the HMIS system.**

The “individual client files” sought by Defendants would include all of the Universal and Program Specific Data Elements set forth hereinabove. Such information would also include actual medical records, disability records, substance use records, and other private protected documents of over 200,000 Louisiana citizens – most of whom are no longer homeless. This is a vast amount of confidential and privileged data belonging to individuals, many of whom never provided such information to Plaintiffs.

Upon information and belief, the overwhelming majority of data contained within the relevant HMIS system was collected and recorded not by Plaintiffs, but by other CHOs (separate programs and/or federal agencies) that also utilize the relevant HMIS system. Some of the Plaintiffs herein enter no client records into HMIS, as those Plaintiffs do not provide direct services to clients. The overwhelming majority of client data contained within the relevant HMIS system thus belongs to clients that were never serviced by the Plaintiffs herein. Some client data is entered into HMIS pursuant to contracts between Plaintiffs and various federal agencies and sub-agencies that provide services to those clients. Many of those contracts incorporate by reference the privacy protections required by HUD and other federal laws and regulations. Because the various agencies, sub-agencies, and programs use HMIS and are thus subject to the same privacy protections imposed by HUD and other federal laws and regulations, these contracts preclude Plaintiffs and other parties from disclosing such client data.

Put simply, Defendants seek to use Plaintiffs’ ability to access the HMIS database in order to force Plaintiffs to turn over all information contained within that database. Not only do Plaintiffs lack the authority to disclose such information, but the Legislative Auditor also lacks the authority to force such disclosure. Access to information granted to the LLA is only to include information that is reasonably related to a lawfully performed audit. *Louisiana Dept. of Ins. ex rel. Donelon v. Theriot*, 10-0069 (La. App. 1st Cir. 5/3/11), 64 So. 3d 854, 862. A party who is not being audited is not required to provide documents to the LLA pursuant to the audit of a separate party. *Purpera v. Robinson*, 20-0815 (La. App. 1st Cir. 2/19/21), 320 So. 3d 425. Similarly, a party under audit is

not required to provide information which it does not possess. *Zillow, Inc. v. Aguillard*, 2022-520 (La. App. 3d Cir. 1/25/23), 354 So. 3d 870.

In sum, the overwhelming majority of data entered into the HMIS system has only a tenuous connection to Plaintiffs herein. Even if the LLA has the authority to audit Plaintiffs' performance, the more than 200,000 individual client files contained within the HMIS is not "reasonably related" to Plaintiffs' performance. Plaintiffs never serviced these clients and did not enter those clients' data into HMIS. Just because Plaintiffs have access to a database containing "individual client files" does not give Plaintiffs possession over those files, nor does such access empower Plaintiffs to provide those files to another party. Rather, various federal laws and regulations explicitly prohibit Plaintiffs from disclosing those individual client files. Plaintiffs lack the authority to provide Defendants with the information demanded.

**4. The "individual client files" demanded by Defendants include privileged information.**

Because the "individual client files" demanded by Defendants include medical records, domestic violence records, substance use records, unaccompanied youth records, and HIV/AIDS status information, those files contain privileged information which cannot be disclosed. Specifically, many of these records are privileged under Louisiana's Health Care Provider Privilege codified in La. Code Evid. art. 510.

As per La. Code Evid. art. 510(C)(1):

a patient has a privilege to refuse to disclose and to prevent another person from disclosing a confidential communication made for the purpose of advice, diagnosis or treatment of his health condition between or among himself, his representative, and his physician or psychotherapist, and their representatives.

A "health care provider" is expressly defined to include psychotherapists, which include those "licensed as a licensed professional counselor or social worker under the laws of any state or nation." *Id.* at (A)(2). A representative of a health care provider includes any "person acting under the supervision, direction, control, or request of... a health care provider engaged in the diagnosis or treatment of the patient." *Id.* at (A)(6)(a).

Although Plaintiffs are not "hospitals" or "doctor's offices" per se, the programs they run and the staff they employ are comprised of social workers and their assistants. Plaintiffs, through these programs and their respective employs, engage in the actual treatment of clients. Thus, the definition of "health care provider" and their "representatives" is broad enough to encompass all of the staff working for Plaintiffs who aid in the diagnosis and treatment of clients.

La. Code Evid. art. 510(A)(8)(b) defines “confidential communication” as:

any information, substance, or tangible object, obtained incidental to the communication process and any opinion formed as a result of the consultation, examination, or interview and also includes medical and hospital records made by health care providers and their representatives.

The privilege afforded in La. Code Evid. art. 510 broadly protects “confidential communications” incidental to receiving diagnosis or treatment, when the information communicated was intended to be kept confidential:

Although the definition of confidential communication under LSA-C.E. art. 510 is broad, inherent in the definition are the concepts of something being expressed by one person to another (“any information...obtained incidental to the communication process”) and an intent that this information not be disclosed to others (“transmittal or acquisition of information not intended to be disclosed.”)

*Matter of Commitment of W.C.*, 96-0777 (La. App. 1st Cir. 12/20/96), 685 So. 2d 634, 637.

The broad definition of “confidential communication” includes the information contained in “individual client files” as demanded in the LLA’s Subpoena. Louisiana’s First Circuit Court of Appeal has found that the definition of “confidential communications” is broad enough to encompass even the mere identities of patients seen by a health care provider. In *Sarphie v. Rowe*, the court “concluded that these sections mean that when an individual walks into a doctor’s office and opens his mouth, that everything spilling out of it, whether it be his identity or his false teeth (a “tangible object”), is presumptively privileged and beyond the reach of discovery.” 92-0975 (La. App. 1st Cir. 4/23/93), 618 So. 2d 905, 908; see also *Matter of Commitment of W.C.*, 685 So. 2d at 637 (concluding that social worker’s testimony as to patient’s work background and work history was obtained as a confidential communication and should have been excluded).

Thus, the broad reading given to “confidential communications” by the *Sarphie* court includes all of the information requested in the Subpoenas, including even the identities of Plaintiffs’ clients. The information is made no less confidential because of its inclusion in the federal HMIS database; indeed, that system was expressly designed in order to preserve confidentiality by sending only anonymized information back to the federal government. A confidential communication is information not intended to be disclosed to anyone other than those necessary to the treatment of the patient. See La. Code Evid. art. 510 (A)(8)(a). Reporting information pursuant to federal regulations does not qualify as an unnecessary party that would destroy confidentiality. The comments to Article 510 specifically address this situation:

“The Fact that a health care provider has complied with a statute relative to reporting (such as R.S. 40:1065(A) – venereal disease reports; R.S. 14:403.4(D) – reporting burn injuries; R.S. 40:1099(A) – reporting of infectious diseases) does not affect the availability of the health care provider testimonial privilege.”

*Id.* at Comment (c). The HMIS system indeed presumes that the federal government can conduct its full oversight functions using data that is anonymized according to the standards of the federal health privacy restrictions in the Health Insurance Portability and Accountability Act (“HIPAA”), 29 U.S.C. § 1132 (1996). The Subpoenas at issue, however, request fully identified data.

Furthermore, the Subpoenas do not meet any of the exceptions set out in the “health care provider-patient privilege.” *See* La. Code Evid. art. 510(B)(2). Since the information requested is protected and privileged, Plaintiffs are entitled to claim the privilege on behalf of their clients. *See* La. Code Evid. art. 510(D): “The person who was the physician, psychotherapist, or health care provider or their representatives, at the time of the communication, is presumed to have authority to claim the privilege on behalf of the patient or deceased patient.”

Other privileges are also prompted by the Subpoenas, including Louisiana’s privilege over communications between domestic violence victims and “community shelters” for domestic violence. The programs administered by Plaintiffs include many “community shelters” as defined in La. R.S. 46:2124.1(A)(1). The information demanded by the Subpoenas necessarily demands production of “privileged communications” as defined in La. R.S. 46:2124.1(A)(2), including, without limitation, confidential and sensitive information related to domestic violence victims. La. R.S. 46:2124.1(B) provides that “[e]xcept as provided in Subsection D, no person shall be required to disclose, by way of testimony or otherwise, a privileged communication or to produce, under subpoena, any records, documentary evidence, opinions, or decisions relating to such privileged communication: [ . . . ] (2) By way of any discovery procedure” (emphasis added.) Based on the clear language of La. R.S. 46:2124.1, the information demanded by the Subpoenas necessarily includes privileged information.

Certain federal law privileges may also be applicable. On June 28, 2024, an authorized representative for one of the Plaintiffs herein reached out to HUD seeking guidance on whether Plaintiffs were allowed to provide the “individual client files” to Defendants as requested in the Subpoenas *Duces Tecum*. Norm Suchar, the Director of the Office of Special Needs Assistance Programs (SNAP) of HUD responded via email on August 23, 2024. A copy of that email is attached hereto as **Exhibit D**. Crucially, Mr. Suchar observed that:

...The CoC may also have data in the HMIS that falls under other legal protections. These can be privilege under state law (i.e., lawyers, doctors, counselors, etc.,) and other local, state, **or federal laws (i.e., Privacy Act (5 U.S.C. 552a), HIPAA, 42 CFR PART 2, VAWA, RHY Act, etc.,).**

**(emphasis added).**

Defendants are not entitled to circumvent such privileges. Louisiana's First Circuit Court of Appeal has held that the Legislative Auditor is not entitled to information that is protected by an evidentiary privilege. *Louisiana Dep't of Ins. Ex rel. Donelon v. Theriot*, 10-0069 (La. App. 1st Cir. 5/3/11), 64 So. 3d 854. In *Theriot*, the Auditor was attempting to audit materials that were protected by the attorney client privilege. The Auditor claimed that the statute detailing its authority to examine information "confidential or otherwise" included documents that were protected by an evidentiary privilege. *Id.* at 859. The court disagreed, noting that the Louisiana Code of Evidence provides that "Chapter 5 of this Code with respect to testimonial privileges applies to all stages of all actions, cases, and proceedings where there is power to subpoena witnesses, including administrative,...legislative, and judicial proceedings." *Id.* The court went on to find that:

[h]ad the legislature intended privileged information to be included in LSA-R.S. 24:513 I, it would have said "confidential, privileged, or otherwise," and not just "confidential or otherwise."... When the legislature intends for privileged information to be overridden by statute, the statute clearly indicates that the privilege is trumped by the statute. In the present case, there is no indication that the statute in question is specifically intended to supplant any privilege.

*Id.* This analysis applies equally to the privileges claimed by the Plaintiffs herein. The Legislative Auditor does not have the power to audit information protected by a testimonial privilege, through any type of subpoena or other statutorily prescribed action.

For the sake of clarity, Plaintiffs assert these privileges over the information of clients that Plaintiffs actually served. To the extent that Plaintiffs may not be able to assert these privileges over the information entered into HMIS by other programs and organizations, Plaintiffs reiterate that they have no control or authority over that information.

**5. The "individual client files" demanded by Defendants amounts to an invasion of privacy.**

The Subpoenas are *not* the proper vehicles to obtain private and privileged information contained within the numerous "individual client files" demanded. Allowing such records to be obtained by Defendants would violate the privacy rights guaranteed by Article 1, § 5 of the

Louisiana Constitution, along with various federal laws and regulations which preclude disclosure of private and privileged information.

As recognized by the Louisiana Constitution, citizens of this state have a reasonable expectation of privacy in their medical records. La. Const. Art. 1, § 5. In *State v. Skinner*, 08-2522 (La. 5/5/09), 10 So. 3d 1212, the Louisiana Supreme Court held:

That the right to privacy in one's medical and prescription records is an expectation of privacy that society is prepared to recognize as reasonable.

*Id.* at 1218. This recognition has also been upheld in the civil context. In *Jo Ellen Smith Psychiatric Hosp. v. Harrell*, a list containing 38 names and social security numbers of patients of the psychiatric hospital was accidentally released to the spouse of one of those patients. 88-0834 (La. App. 1st Cir. 6/20/89), 546 So. 2d 886, 887. When the spouse threatened to contact the other patients to investigate the possibility of a claim against the hospital, the hospital sought a preliminary injunction. Louisiana's First Circuit found that "the party defendant's right to investigate the possibility of a claim...is outweighed by the rights of the 38 non-party patients to privacy and privilege with respect to the patient-identifying information contained in the Blue Cross registers." *Id.* at 888. The court found that the non-parties had a reasonable expectation of privacy in the fact that they or their dependents had been treated at the hospital; it did not matter how the plaintiff had obtained the private information since it was not in the public domain and did not pertain to public figures. *Id.*

The Subpoenas *Duces Tecum* ask not only for the identities of all of Plaintiffs' clients, but request even more personal and private information such as medical records, disability records, substance use records, unaccompanied youth records, and HIV/AIDS status. Again, this information is protected from disclosure by numerous federal laws and regulations, including but not limited to: 5 U.S.C. § 522a (Privacy Act); 42 U.S.C. § 1320d-9 (Health Insurance Portability and Accountability Act ("HIPAA")); 42 C.F.R Part 2 (Confidentiality of patient records created by federally assisted programs for the treatment of substance use disorders); 28 C.F.R 90.4(b)(2)(iii) (Violence Against Women Act ("VAWA") Confidentiality Provision); 42 U.S.C § 5701, et seq. (Runaway and Homeless Youth Act ("RHY")); 42 U.S.C. § 12905(e) and 24 C.F.R. § 574.440 (Housing Opportunities for Persons with AIDS ("HOPWA") confidentiality provisions).

Individuals whose private and privileged information are contained within the HMIS certainly have a reasonable expectation of privacy in all of this information – especially given the federal laws and regulations cited above, as well as Plaintiffs’ privacy and disclosure notices which embody the protections provided in those laws and regulations. If Plaintiffs disclose their clients’ private and sensitive information, Plaintiffs themselves could be subject to suit for invasion of privacy. For these reasons, the Subpoenas *Duces Tecum* should be quashed.

**6. Plaintiffs do not have possession of the “SQL backup” as demanded by Defendants.**

The “SQL backup” demanded by Defendants would necessarily include proprietary information owned by its software provider, WellSky. By the express terms of its contract with WellSky, Plaintiffs are precluded from disclosing such proprietary information. Defendants cannot compel Plaintiffs to breach a contract with a private party not under audit.

Moreover, the “SQL backup” is simply not in Plaintiffs’ possession. If provided, such would have to come from WellSky itself. Louisiana jurisprudence further recognizes that one cannot be compelled to provide information which he does not have. In *Zillow, Inc. v. Aguillard*, 2022-520 (La. App. 3d Cir. 1/25/23), 354 So. 3d 870, the plaintiff Zillow made a public records request to the defendant Calcasieu Parish Assessor for the Parish’s assessment data in .txt format, which is searchable. The Assessor had responded to Zillow’s public records request by providing the data in .pdf format, and informed Zillow that the Assessor did not have the data in .txt format, but the Assessor’s private contractor, Software & Services, Inc. (“S & S”) had the data in .txt format. Zillow sought and obtained a writ of mandamus from the District Court, ordering the defendant Assessor “to permit Zillow, Inc., to purchase the assessment data from her external vendor, Software and Services, Inc., for the fee that company customarily charges for the production of the tax assessment rolls.” *Id.* at 873. The Third Circuit reversed, stating that “the evidence demonstrates that Aguillard does prepare or store the tax information in .txt format, and she lacks the capacity to produce a .txt format document; ergo, she cannot be compelled to produce them in that format.” *Id.* at 880.

Like the Assessor in *Aguillard*, Plaintiffs cannot be compelled to produce data in the possession of a private contractor. If Defendants wish to have the “SQL backup” of the HMIS system, it must be WellSky who provides that data. Plaintiffs are wholly powerless to provide the “SQL backup” demanded by Defendants.

**7. If Louisiana law allows Defendants to obtain the information sought, then such law is preempted by relevant federal laws and regulations.**

If the laws of the state of Louisiana permit Defendants to obtain all “individual client files” within HMIS, then such laws directly conflict with federal laws that expressly preclude the disclosure of that information. Such federal laws include, but are not limited to: 5 U.S.C. § 522a (Privacy Act); 42 U.S.C. § 1320d-9 (Health Insurance Portability and Accountability Act (“HIPAA”)); 42 C.F.R Part 2 (Confidentiality of patient records created by federally assisted programs for the treatment of substance use disorders); 28 C.F.R 90.4(b)(2)(iii) (Violence Against Women Act (“VAWA”) Confidentiality Provision); 42 U.S.C § 5701, et seq. (Runaway and Homeless Youth Act (“RHY”)); 42 U.S.C. § 12905(e) and 24 C.F.R. § 574.440 (Housing Opportunities for Persons with AIDS (“HOPWA”) confidentiality provisions). *See* Exhibit D, email from HUD official.

Confidential information of participants in the above-referenced federal programs are contained within the HMIS “individual client files” sought by Defendants. Recognizing the need to uphold the confidentiality of such information, Congress contemplated that data stored by HMIS would be maintained in a manner that protects the confidentiality of that data (by ensuring it is encrypted) and authorized the Secretary of HUD to provide for civil and criminal penalties for “unlawful disclosure of data.” 42 U.S.C. § 11360(a)(f)(3)(D). If Louisiana law demands disclosure of the HMIS “individual client files,” then such law conflicts with the federal laws and regulations cited above.

The Supremacy Clause of the United States Constitution mandates that federal laws reign supreme over state law. U.S. Const. Art. VI, § 2. For the Supremacy Clause to apply, the federal government must manifest an intention to preempt state law. *Medtronic, Inc. v. Lohr*, 518 U.S. 470, 485 (1996). Courts begin with the assumption that the federal government does not intend to supersede the states’ historic police powers unless Congress manifests a clear intent to do so. *Id.* Federal law will preempt state law in several instances, including “when compliance with both state and federal law is impossible or when the state law ‘stands as an obstacle to the accomplishment and execution of the full purposes and objectives of Congress.’” *Capital Cities Cable, Inc. v. Crisp*, 467 U.S. 691, 699 (1984) (internal citations omitted). Federal regulations as well as federal statutes can preempt state law. *Hillsborough County, Fla. V. Automated Medical Laboratories, Inc.*, 471 U.S. 707, 713 (1985).

Federal privacy requirements for information within HMIS likely preempt the power of Defendants through the doctrine of implied conflict preemption. A conflict for preemption purposes arises when “compliance with both federal and state regulations is a physical impossibility” or where the state law “stands as an obstacle to the accomplishment and execution of the full purposes and objectives of Congress.” *Hillsborough County*, 471 U.S. at 713. A determination of whether there is “a sufficient obstacle is a matter of judgment, to be informed by examining the federal statute as a whole and identifying its purpose and intended effects.” *Crosby v. Nat’l Foreign Trade Counsel*, 530 U.S. 363, 373 (2000) (“If the purpose of the act cannot be otherwise accomplished – if its operation within its chosen field else must be frustrated and its provisions be refused their natural effect – the state law must yield to the regulation of Congress within the sphere of its delegated power.” (citations omitted)).

The federal statutes and regulations governing privacy and confidentiality of data in HMIS should preempt the provisions of La. R.S. 24:513 through the doctrine of implied conflict preemption for three reasons: (1) compliance with both laws is impossible because compliance with one can trigger penalties for non-compliance of the other; (2) La. R.S. 24:513 stands as an obstacle to the accomplishment and execution of the full purposes and objectives of Congress in establishing HMIS; and (3) privacy provisions of HMIS are refused their natural effect if Defendants can take possession of “individual client files” and all of the data therein.

Compliance with federal and state law in this instance is impossible because compliance with one can trigger penalties for non-compliance of the other. Participation in HMIS is required for a CoC, even for organizations in the CoC that do not receive federal funding. Congress and HUD, through regulations and its privacy policies in the HUD Notice, clearly mandated that CoCs maintain the privacy and confidentiality of data contained in HMIS. Congress contemplated that data stored by HMIS would be maintained in a manner that protects the confidentiality of that data (by ensuring it is encrypted) and authorized the Secretary of HUD to provide for civil and criminal penalties for “unlawful disclosure of data.” 42 U.S.C. § 11360(a)(f)(3)(D). The “individual client files” within HMIS cannot be both subject to disclosure under Louisiana law with penalties imposed for non-disclosure, and also be protected as private and confidential under federal law with penalties imposed for failing to safeguard against unlawful disclosure. Since compliance with both is a “physical impossibility”, federal law likely preempts Louisiana law. See *Fla. Live & Avocado Growers, Inc. v. Paul*, 373 U.S. 132, 142 (1963); see also *Crosby*, 530 U.S. at 373-74;

and *Idaho AIDS Foundation, Inc. v. Idaho Housing & Finance Ass'n*, 422 F.Supp.2d 1193, 1199-1200 (D. Idaho 2006) (holding that under the federal Constitution, a housing authority violated HOPWA beneficiaries' right to informational privacy when it requested unrestricted access to files for audit.)

Furthermore, where Congress creates a minimum standard that leaves room for states to supplement the federal law with additional protections, but state legislation allows for action below the floor set by Congress, the state law would create a substantial obstacle to the accomplishment of Congress's original intentions. *Cf. Frank Bros., Inc. v. Wisconsin Dept. of Transportation*, 409 F.3d 880, 895 (holding that where Congress creates a floor, state legislation above the federal requirement does not stand in the way of the federal objective). La. R.S. 24:513 "stands as an obstacle to the accomplishment and execution of the full purposes and objectives of Congress" by allowing disclosure of HMIS "individual client files" below the floor set by HUD and other federal laws and regulations. See *Evans v. Evans*, 818 F. Supp. 1215, 1223(N.D. Ind. 1993) (federal Individuals with Disabilities Education Act preempts state law if the state law standards are below the federal minimum).

HMIS is crucial to the implementation of the federal plan to end homelessness and to numerous federal objectives related to ending homelessness. HUD itself never receives PII or other protected information within HMIS, and instead only requires data to be reported in a disaggregated format. If all of the "individual client files" in HMIS – containing private protected information of over 200,000 Louisiana citizens – were subject to disclosure to Defendants, it would undermine the participation of clients in HMIS and significantly impede the utility of the system as an effective data source.

Much of the data within HMIS is not subject to any disclosure. Of the data that is subject to permissible disclosure, such disclosure should be considered in context not only with the HUD Notice, but also with the clear mandate from Congress and HUD through federal statutes and regulations that intend to protect the confidentiality and privacy of information in HMIS. First, all potential disclosures allowed in the HUD notice are permissive, not mandatory, as the default presumption is that all PII in HMIS is private and confidential as required by Congress. See HUD Notice at 45928. Second, Defendants' weaponization of this permissive use would render all of the privacy requirements for HMIS meaningless. The purpose of Congress in enacting the subject law or regulation is the ultimate touchstone in every preemption case. Here, the relevant statutes,

regulations, and guidelines explicitly state and intention to keep information within HMIS private. Courts have repeatedly held that the plain meaning of the language employed is evidence of intent; therefore, submitting to Defendants' authority under La. R.S. 24:513 would stand as a substantial obstacle to the federal interest of protecting private information within HMIS. See *Reno v. Condon*, 528 U.S. 141 (2000).

## II. CONCLUSION

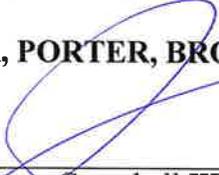
Defendants seemingly interpret the provisions of La. R.S. 24:513 as allowing the seizure of any and all personal and confidential information from a database shared by private nonprofit organizations seeking to end and prevent homelessness. If true, Defendants would similarly be allowed to seize of any and all personal and private information of any client served by a private nonprofit organization in the state that receives any assistance from any government source – including substance use rehabilitation facilities, organizations coordinating adoptions, organizations providing credit counseling or home ownership counseling and assistance, and organizations serving senior citizens. This is an egregious overreach of legislative audit power.

Regardless of the perceived scope of Defendants' powers, Plaintiffs herein lack both the authority and ability to provide Defendants with the information demanded. Furthermore, if Plaintiffs were to comply with the Subpoenas *Duces Tecum*, they would stand in violation of numerous federal laws and regulations, thereby subjecting Plaintiffs to potential criminal and civil liability, as well as loss of funding. For the reasons set forth herein, the Subpoenas *Duces Tecum* issued by the LLA and the LAAC should be quashed, in whole or in part.

Respectfully submitted,

**TAYLOR, PORTER, BROOKS & PHILLIPS L.L.P.**

By

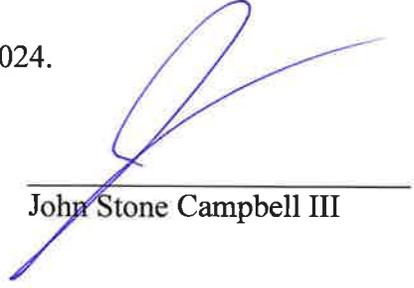
  
\_\_\_\_\_  
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**Attorneys for Plaintiffs**

**CERTIFICATE**

I hereby certify that a copy of the above and foregoing was this date served on all known counsel of record via e-mail.

Baton Rouge, Louisiana, this 19<sup>th</sup> day of December, 2024.



\_\_\_\_\_  
John Stone Campbell III

19TH JUDICIAL DISTRICT COURT

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

LOUISIANA SERVICES NETWORK	* NUMBER: 752,676
DATA CONSORTIUM, ET AL	*
	* SECTION: "22"
VERSUS	*
	*
MICHAEL J. WAGUESPACK, in his	*
capacity as the LOUISIANA LEGISLATIVE	*
AUDITOR, and RODNEY WAYNE	*
SCHAMERHORN, in his capacity as	*
CHAIRMAN OF THE LOUISIANA	*
LEGISLATIVE AUDIT ADVISORY	*
COUNCIL	

**SECOND AMENDED PETITION FOR DECLARATORY JUDGMENT**

**NOW INTO COURT**, through undersigned counsel, come Plaintiffs, Louisiana Services Network Data Consortium ("LSNDC"), Acadiana Regional Coalition on Homelessness and Housing ("ARCH"), Central Louisiana Homeless Coalition ("CENLA"), HOME Coalition, HOPE Connections, Northlake Homeless Coalition, and UNITY of Greater New Orleans (collectively, "Plaintiffs"), all of whom are private not-for-profit organizations operating in the state of Louisiana. In response to the Subpoenas *Duces Tecum* issued on or about August 3, 2024 by defendant, the Louisiana Legislative Auditor, Plaintiffs petition this Honorable Court for a judgment declaring that Plaintiffs are not required to produce the information demanded. Plaintiffs filed their original Petition for Declaratory Judgment on Monday, August 26, 2024, naming the "Louisiana Legislative Auditor" as the sole defendant therein. Plaintiffs filed their First Amended Petition for Declaratory Judgment on August 29, 2024, naming as additional defendants Michael J. Waguespack, in his capacity as the Louisiana Legislative Auditor (the "LLA" or the "Auditor"), an arm of the Louisiana State Legislature, whose duties and powers are set forth in La. R.S. 24:513, *et seq.*, and Rodney Wayne Schamerhorn, in his capacity as Chairman of the Louisiana Legislative Audit Advisory Council. In a Judgment dated December 2, 2024, the Court granted Defendants' Exception of Non-Joinder and ordered Plaintiffs to amend their Petition for Declaratory Judgment (and their Motion to Quash Subpoena *Duces Tecum*) to name as a defendant the Honorable Legislature of the State of Louisiana, to be served on the Speaker of the Louisiana House of Representatives and the President of the Louisiana Senate. Plaintiffs now submit this Second Amended Petition for Declaratory Judgment to name the Honorable Legislature of the State of Louisiana as an additional defendant herein.

1.

Made defendants herein are: (1) Michael J. Waguespack, in his capacity as the Louisiana Legislative Auditor (the “LLA” or the “Auditor”), an arm of the Louisiana State Legislature, whose duties and powers are set forth in La. R.S. 24:513, et seq.; (2) Rodney Wayne Schamerhorn, in his capacity as Chairman of the Louisiana Legislative Audit Advisory Council (the “LAAC”); and 3) the Honorable Legislature of the State of Louisiana, through the Honorable Cameron Henry, President of the Louisiana Senate, and the Honorable Phillip R. DeVillier, Speaker of the Louisiana House of Representatives (collectively, “Defendants”).

2.

Plaintiff LSNDNC was established solely to facilitate and coordinate the work of Louisiana’s Continuums of Care<sup>1</sup> in establishing and operating a Homeless Management Information System. To that end, LSNDNC is authorized to act in accordance with the Joint Governance Agreement that has been implemented between Louisiana’s Continuums of Care and LSNDNC.

3.

A Continuum of Care (CoC) is a program authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. §§ 11381-11389) and is a framework for a comprehensive and seamless array of emergency, transitional, and permanent housing, and services to address the various needs of homeless persons and persons at risk for homelessness. 24 C.F.R §§ 576.2, 578.1, 578.3.

4.

A given CoC comprises representatives of organizations, including nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, business, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve people who have previously and are currently experiencing homelessness to the extent that these groups are represented within the geographic area and are available to participate. *See HUD 2024 HMIS Data Standards Manual*, p. 16.

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<sup>1</sup> Louisiana has seven regional Continuums of Care. Plaintiffs in this action, namely ARCH, CENLA Homeless Coalition, HOME Coalition, HOPE Connections, Northlake Homeless Coalition, and UNITY of Greater New Orleans (collectively, the “CoCs”) are the lead agencies overseeing the Continuums of Care for their respective regions.

5.

Each CoC is responsible for establishing a system that complies with the U.S. Department of Housing and Urban Development's ("HUD") data collection, management, and reporting standards and is used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. 42 U.S.C.A § 11360(a)(f)(3); 24 C.F.R §§ 578.1, 578.3.

6.

The Homeless Management Information System ("HMIS") is a community-wide information system designated by a local CoC to comply with the requirements of 24 C.F.R. § 578. HMIS is a locally implemented data system used to record and analyze client, service, and housing data for individuals and families who are experiencing homelessness or at risk of homelessness. *See HUD 2024 HMIS Data Standards Manual*, p. 13.

7.

HUD, through the Office of Special Needs Assistance Programs ("SNAPS") partners with other federal agencies to establish the requirements for HMIS to ensure that there is a comprehensive data response to the congressional mandate to report annually on national homelessness. HMIS is used by all projects that target services to persons experiencing homelessness within SNAPS and the office of HIV-AIDS Housing, as well as other federal partners from the U.S. Department of Health and Human Services ("HHS") and the U.S. Department of Veterans Affairs (VA) and their respective programs to measure project performance and participate in benchmarking of the national effort to end homelessness. *See HUD 2024 HMIS Data Standards Manual*, p. 13.

8.

Thus, each CoC is compelled by federal law to maintain an HMIS system for recording and analyzing client, service, and housing data. The specific data elements currently required to be maintained within an HMIS are set forth by HUD in its *2024 HMIS Data Standards Manual* and *CoC Program HMIS Manual*.

9.

HMIS Universal Data Elements ("UDEs") are elements required to be collected by all projects participating in HMIS, regardless of funding source. UDEs enable the HMIS to record unique, unduplicated client records in order to estimate the number of people experiencing homelessness accessing services from homeless assistance projects, basic demographic

characteristics of people experiencing homelessness, and patterns of service use, including information on shelter stays and homelessness over time. *See* HUD 2024 HMIS Data Standards Manual, p. 48.

**10.**

The UDEs required to be collected for every client that engages with a project participating in HMIS include: (1) Name; (2) Social Security Number; (3) Date of Birth; (4) Race and Ethnicity; (5) Gender; (6) Veteran Status; (7) Disabling Conditions; (8) Project Start and Exit Dates; (9) Destination; (10) Relationship to Head of Household; (11) Program Enrollments; (12) Housing Move-in Date; and (13) Prior Living Situation. *See* HUD 2024 HMIS Data Standards Manual, p. 48 *and* CoC Program HMIS Manual, p. 11.

**11.**

Furthermore, to meet the statutory and regulatory requirements of federally funded programs using HMIS, additional data elements are required for different funding sources. Program Specific Data Elements (“PSDEs”) are elements that are required by at least one of the HMIS Federal partner Programs. *See* HUD 2024 HMIS Data Standards Manual, p. 77.

**12.**

Common PSDEs required to be collected by CoCs and other federally funded programs using HMIS include: (1) Income and Sources; (2) Non-Cash Benefits; (3) Health Insurance; (4) Physical Disability; (5) Developmental Disability; (6) Chronic Health Condition; (7) HIV/AIDS Status; (8) Mental Health Disorder; (9) Substance Use Disorder; (10) Domestic Violence; (11) Current Living Situation; (12) Date of Engagement; (13) Coordinated Entry Assessment and Event; Moving On Assistance Provided; (14) Translation Assistance Needed; (15) Sexual Orientation; and (16) Housing Assessment at Exit. *See* CoC Program HMIS Manual, p. 13.

**13.**

Due to the confidential and privileged nature of the collected data outlined above, Congress requires participating programs to ensure that HMIS is operated according to standards developed by the Secretary of HUD that provide for, among other requirements, encryption of data collected, criminal and civil penalties for unlawful disclosure of data, and any other standards the Secretary deems necessary. 42 U.S.C. § 11360(a)(f)(3)(D). Each CoC is required to approve a “privacy plan, security plan, and data quality plan for the HMIS” and ensure HMIS is administered in compliance with the requirements prescribed by HUD. 24 C.F.R. § 578.7(b).

14.

HUD further developed and published privacy and security requirements for HMIS through its 2004 Data and Technical Standards Notice (the “HUD Notice”). The HUD Notice provides baseline standards required of any Covered Homeless Organization (“CHO”) that records, uses, or processes protected personal information (“PPI”) on homeless clients for an HMIS. *Id.* at 45927-45928. The HUD Notice further identifies additional protocols or policies that organizations may choose to adopt to enhance further the privacy and security of information collected through HMIS. *Id.*

15.

The HUD Notice defines “protected personal information” (“PPI”) as “any information maintained by or for a Covered Homeless Organization about a living homeless client or individual that: (1) Identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual.” *Id.* at 45928.

16.

The HUD Notice authorizes CHOs to use or disclose PPI only if the use or disclosure is allowed by the HUD Notice and is described in the CHOs’ own privacy notice. All CHOs are required to publish a privacy notice describing policies and practices for the processing of PPI and must provide a copy of its privacy notice to any individual upon request. *Id.* at 45930. The privacy notice must contain all additional privacy protections adopted by the CHOs in its privacy notice, thereby committing the CHO to additional privacy protections consistent with HMIS requirements. *Id.* at 45929-45930.

17.

Except for first party access to information and any required disclosures for oversight of compliance with HMIS privacy and security standards, all uses and disclosures of PPI are “*permissive and not mandatory*” (*emphasis added*). *Id.* at 45930. “Permissive” means uses and disclosures not specified in a CHO’s privacy notice can be made only with the consent of the individual or when required by law. *Id.*

18.

Finally, the HUD Notice requires CHOs to comply with federal, state, and local laws that require additional confidentiality protections. *Id.* at 45929. In doing so, HUD recognizes that state

laws may have stronger confidentiality provisions and provides that state confidentiality law (if indeed stronger) would prevail in the event of a conflict.

**19.**

Taken together, because Plaintiffs record, use, and/or process PPI for an HMIS, they are considered to be CHOs subject to the HMIS Privacy Standards provided in the HUD Notice. However, upon information and belief, the overwhelming majority of data contained within the relevant HMIS system was collected and recorded not by Plaintiffs, but rather by other CHOs (separate programs and/or federal agencies) that also utilize the relevant HMIS system. Some of the Plaintiffs herein enter no client records into HMIS, as those Plaintiffs do not provide direct services to clients. Thus, the overwhelming majority of client data contained within the relevant HMIS system belongs to clients that were never serviced by the Plaintiffs herein.

**20.**

Beginning in early-mid 2024, the Louisiana Legislative Auditor (the “LLA” or the “Auditor”) wrote to one or more Plaintiffs and claimed that:

“State law (LSA RS 24:513(D)(4)) directs the Louisiana Legislative Auditor to conduct performance audits, program evaluations and other studies to enable that the Legislature and its committees to evaluate the efficiency, effectiveness, and operations of state programs and activities. In accordance with these legislative mandates, we have scheduled a performance audit of the U.S. Department of Housing and Urban Development’s [CoCs]...”

(emphasis added). A copy of the LLA’s letters to Plaintiffs UNITY and ARCH are attached hereto as **Exhibit A**. In making this representation, the LLA has designated its audit of Plaintiffs as a “performance audit.”

**21.**

On August 3, 2024, the LLA and the LAAC issued the Subpoenas *Duces Tecum* attached hereto as **Exhibit B**, *in globo*. Claiming authority pursuant to Article III, § 7 of the Louisiana Constitution and La. R.S. 24:513(M)(1), Defendants commanded Plaintiffs to produce, among other things, the following documents:

- **SQL backup of HMIS for [all Plaintiffs]**
- **Documentation of HMIS layout, structure, contents, tables, fields, etc., such as a data dictionary and technical manuals, if another one exists besides the publicly available one**
- **Individual client files, including but not limited to those containing Personal Identifiable Information (PII) and Personal Protected Information (PPI), as needed to verify data entered into HMIS**

- **Individual payment agreement between [Plaintiffs] and WellSky**

**22.**

As a fundamental matter, the LLA is not authorized to conduct a “performance audit” of Plaintiffs. La. R.S. 24:513(D)(4) provides that the Auditor “shall conduct performance audits, program evaluations, and other studies as are needed to enable the legislature and its committees to evaluate the efficiency, effectiveness, and operation of state programs and activities” (emphasis added). Thus, the LLA’s power to conduct a “performance audit” is strictly limited to “state programs and activities.”

**23.**

The limitation of the LLA’s performance audit power in La. R.S. 24:513(D)(4) aligns with a similar limitation found in La. R.S. 24:522, “Louisiana Performance Audit Program.” Subsection 522(C) compels the LLA to “provide the legislature with an evaluation and audit of the functions and activities of the agencies of state government” (emphasis added). Subsection 522(B) defines “state agency” as “any state agency, office, department, board, commission, institution, division, committee, program, or legal entity, heretofore existing or hereafter created within the legislative or executive branch of state government...”.

**24.**

Plaintiffs herein are not “state programs and activities” within the meaning of La. R.S. 24:513(D)(4), nor are Plaintiffs “state agencies” within the meaning of La. R.S. 24:522. The LLA thus lacks the power or authority to conduct the “performance audit” of Plaintiffs as described in Exhibit A.

**25.**

If the LLA is empowered to audit the performance of Plaintiffs, such audit must be limited to “state programs and activities” as provided in 24:513(D)(4). The LLA’s performance audit authority does not extend to non-state programs or activities. The LLA therefore cannot audit Plaintiffs’ performance with regard to *federal* programs or activities.

**26.**

Plaintiffs do not contend that they are totally immune from the LLA’s audit authority. Plaintiffs concede that they are “quasi public agencies” within the meaning of La. R.S. 24:513(A)(1)(b)(iv), as Plaintiffs are not-for-profit organizations that receive or expend some local or state assistance. Furthermore, because Plaintiffs are “not included within the annual

comprehensive financial reports required pursuant to [La.] R.S. 39:80,” Plaintiffs are considered “local auditees” within the meaning of Subsection 513(A)(3).

**27.**

As “local auditees,” La. R.S. 24:513(A)(3) provides that Plaintiffs “shall be audited or reviewed by licensed certified public accountants...”<sup>2</sup> The LLA may only audit or investigate a local auditee in those instances expressly enumerated in Subsection 513(A)(4)(a)(i)-(vi). None of those instances are present in this matter, nor has the LLA delineated the applicability of any of these instances to its “performance audit.”

**28.**

Despite the LLA’s inherent lack of authority, in the spirit of voluntary cooperation and the desire to respond to public requests for information, Plaintiffs worked with the Auditor and staff to satisfy the Auditor’s requests. Some Plaintiffs provided the individual payment agreement(s) with WellSky, financial transaction data for HUD grant programs, and supporting documentation for those transactions. Plaintiffs also provided the location HMIS data dictionaries and technical manuals.

**29.**

All Plaintiffs steadfastly objected, however, to the Auditor’s commanded production of (1) the SQL backup of HMIS, and (2) individual client files containing PII and PPI.

**30.**

“SQL backup” is defined<sup>3</sup> as “a copy of SQL Server data that can be used to restore and recover the data after the failure. A backup of SQL server data is created at the level of a database or one or more of its files or filegroups.” Plaintiffs lack the ability and authority to produce the “SQL backup of HMIS” as requested by the Auditor. The “SQL backup” is not in Plaintiffs’ possession, but rather is in the possession of WellSky – a wholly private entity. Furthermore, upon information and belief, the “SQL backup” contains proprietary information owned by WellSky, and Plaintiffs are bound by contract to not disclose such information.

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<sup>2</sup> Indeed, Plaintiffs are audited each year by a licensed certified public accountant, and the results of said audits are given to the LLA. Plaintiffs are also reviewed by HUD each year. Yet, neither HUD nor the state auditors have ever sought to review the trove of confidential and privileged information the LLA now demands.

<sup>3</sup> <https://learn.microsoft.com/en-us/sql/relational-databases/backup-restore/backup-overview-sql-server?view=sql-server-ver16>

**31.**

As to “individual client files” containing PII and PPI, Plaintiffs lack the authority to disclose such information. Again, the overwhelming majority of that information within the HMIS system belongs to clients who were never serviced by the Plaintiffs herein. Rather, that data was collected and recorded by other CHOs (separate programs and/or federal agencies) that also utilize the relevant HMIS system.

**32.**

The “individual client files” sought by the Auditor would include all of the client information outlined in Paragraphs 10 and 12 hereinabove. Such information would also include actual medical records, disability records, substance use records, unaccompanied youth information, HIV/AIDS status, and other private protected documents of over 200,000 Louisiana citizens – most of whom are no longer homeless. This is a vast amount of confidential and privileged data belonging to individuals that never provided such information to Plaintiffs.

**33.**

The overwhelming majority of data contained within the HMIS system was collected from clients that were serviced with federal funds that did not pass through state or local government. The LLA has no authority to audit the performance of these programs, and thus has no right to the files of individuals serviced by these programs.

**34.**

Put simply, the Auditor seeks to use Plaintiffs’ ability to access the HMIS database in order to force Plaintiffs to turn over all information contained within that database. This database does not belong to Plaintiffs, nor did Plaintiffs enter all of the information into this database. Plaintiffs lack the authority to provide such information. The Legislative Auditor lacks the authority to force Plaintiffs to provide such information.

**35.**

Even as to those clients who actually received services from Plaintiffs and provided the requisite information associated with such services, Plaintiffs still lack the authority to disclose the files of those clients. Those “individual client files” include medical records, disability records, substance use records, domestic violence records, unaccompanied youth information, and HIV/AIDS status – all of which are protected from disclosure by federal and state law.

**36.**

Furthermore, in accordance with the requirements set forth in the HUD Notice, each Plaintiff maintains a privacy policy and provides each of their clients with a disclosure consent form (LSNDC notices and disclosures are attached hereto as **Exhibit C, *in globo***). The documents attached as Exhibit C provide that the client's medical records, disability records, substance use records, domestic violence records, unaccompanied youth information, and HIV/AIDS status will not be disclosed to anyone without the client's written consent for disclosure. The documents attached as Exhibit C do provide that certain client data may be subject to disclosure for specified reasons – none of which are applicable here.

**37.**

The prohibition on disclosure of the client data referenced in Exhibit C and Paragraph 36 above comports with various federal laws and regulations which explicitly prohibit the disclosure of such information. Such federal laws include, but are not limited to: 5 U.S.C. § 522a (Privacy Act); 42 U.S.C. § 1320d-9 (Health Insurance Portability and Accountability Act (“HIPAA”)); 42 C.F.R Part 2 (Confidentiality of patient records created by federally assisted programs for the treatment of substance use disorders); 28 C.F.R 90.4(b)(2)(iii) (Violence Against Women Act (“VAWA”) Confidentiality Provision); 42 U.S.C § 5701, et seq. (Runaway and Homeless Youth Act (“RHY”)); 42 U.S.C. § 12905(e) and 24 C.F.R. § 574.440 (Housing Opportunities for Persons with AIDS (“HOPWA”) confidentiality provisions). In addition, because a very large number of the persons in this database are people with disabilities who requested housing assistance, requiring the disclosure of their private personal information, including information about their disabilities, violates the U.S. Fair Housing Act (42 U.S.C. § 3601 et seq.).

**38.**

The applicability of the above cited federal laws and regulations was confirmed via email from Norm Suchar, the Director of the Office of Special Needs Assistance Programs (SNAP) of HUD responded on August 23, 2024. A copy of that email is attached hereto as **Exhibit D**. Crucially, Mr. Suchar observed that:

...The CoC may also have data in the HMIS that falls under other legal protections. These can be privilege under state law (i.e., lawyers, doctors, counselors, etc.) and other local, state, **or federal laws (i.e., Privacy Act (5 U.S.C. 552a), HIPAA, 42 CFR PART 2, VAWA, RHY Act, etc.,).**

**(emphasis added).**

**39.**

Some client data is entered into HMIS pursuant to contracts between Plaintiffs and various federal agencies and sub-agencies that provide services to those clients. Many of those contracts incorporate by reference the privacy protections required by HUD and other federal laws and regulations. Because the various agencies, sub-agencies, and programs use HMIS and are thus subject to the same privacy protections imposed by HUD and other federal laws and regulations, these contracts preclude Plaintiffs and other parties from disclosing such client data.

**40.**

HUD regulations themselves prevent the Auditor from forcing Plaintiffs to disclose client PPI contained in the HMIS system. Except for first party access to information and any required disclosures for oversight of compliance with HMIS privacy and security standards, all uses and disclosures of PPI are “*permissive and not mandatory*” (*emphasis added*). *Id.* at 45930. The Auditor’s demand for the entirety of the HMIS database does not constitute “first party access” or “oversight of compliance with HMIS privacy and security standards.” Disclosure of the information demanded by the Auditor is therefore “*permissive and not mandatory*” (consent of the individual would be required).

**41.**

Even if Plaintiffs otherwise had the authority to provide the Auditor with all “individual client files” within the HMIS system, much of the information contained within those files is considered private and privileged under Louisiana law, including but not limited to the privileges provided in La. Code Evid. art. 510 and La. R.S. 46:2124.1. The Legislative Auditor lacks the authority to subpoena privileged documents.

**42.**

Even if Plaintiffs otherwise had the authority to provide the Auditor with all “individual client files” within the HMIS system, much of the information contained within those files is protected by the right to privacy enumerated in Article 1, § 5 of Louisiana’s Constitution.

**43.**

In sum, provision of the “individual client files” demanded by defendants would place Plaintiffs in breach of: (1) various federal laws and regulations; (2) privacy agreements between Plaintiffs and individual clients prohibiting disclosure of such information; (3) contracts between Plaintiffs and various other federal agencies, sub-agencies, and programs; and (4) Louisiana constitutional and statutory privacy and privilege protections.

44.

In breaching the above-referenced regulations, laws, and contracts, Plaintiffs would subject themselves to criminal and civil liability and risk the loss of government funding upon which Plaintiffs rely. Thus, if La. R.S. 24:513 allows the LLA to obtain the HMIS “individual client files” from Plaintiffs, that statute conflicts with the prohibitions on disclosure enumerated in the various federal laws and regulations cited hereinabove. State law must yield to the federal laws and regulations in the event of a conflict.

45.

Contemporaneous with this filing, Plaintiffs are filing a *Motion to Quash* the Legislative Auditor’s Subpoenas *Duces Tecum*.

**WHEREFORE**, Plaintiffs respectfully pray that citation and a certified copy of this Pleading issue and be served upon Defendants, that the Court set this matter for hearing, and that after said hearing this Honorable Court render judgment in Plaintiffs’ favor and as follows:

- a. A judgment declaring that Defendants lack the authority to force Plaintiffs to provide the information demanded in the Subpoenas *Duces Tecum*, in whole or in part;
- b. A judgment declaring that Plaintiffs lack the legal authority, and thus are not required, to provide the information demanded by Defendants, in whole or in part;
- c. A judgment declaring the rights and obligations of the parties pertaining to the subject matter herein, in particular the Subpoenas *Duces Tecum* issued to Plaintiffs herein;
- d. A judgment granting Plaintiffs’ *Motion to Quash*, thereby quashing Defendants’ Subpoena *Duces Tecum* in whole or in part; and
- e. For all other general and equitable relief to which Plaintiffs are entitled.

Respectfully submitted,

**TAYLOR, PORTER, BROOKS & PHILLIPS L.L.P.**

By

\_\_\_\_\_  
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*Attorneys for Plaintiffs*

**PLEASE SERVE:**

The Honorable Michael J. Waguespack  
Louisiana Legislative Auditor  
1600 North Third Street  
Baton Rouge, LA 70802

The Honorable Rodney Schamerhorn  
Chair, Louisiana Legislative Audit Advisory Council  
1600 North Third Street  
Baton Rouge, LA 70802

The Honorable Liz Murrill  
Louisiana Attorney General  
1885 North Third Street  
Baton Rouge, LA 70802

The Louisiana State Legislature,  
Through the President of the Louisiana Senate:

The Honorable Cameron Henry  
2573 Metairie Road, Suite C  
Metairie, LA 70001

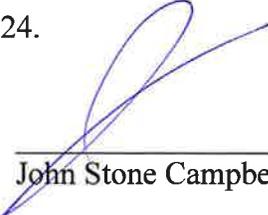
The Louisiana State Legislature,  
Through the Speaker of the Louisiana House of Representatives:

The Honorable Phillip R. DeVillier  
Louisiana State Capitol Building  
439 Highway 758  
Eunice, LA 70535

**CERTIFICATE**

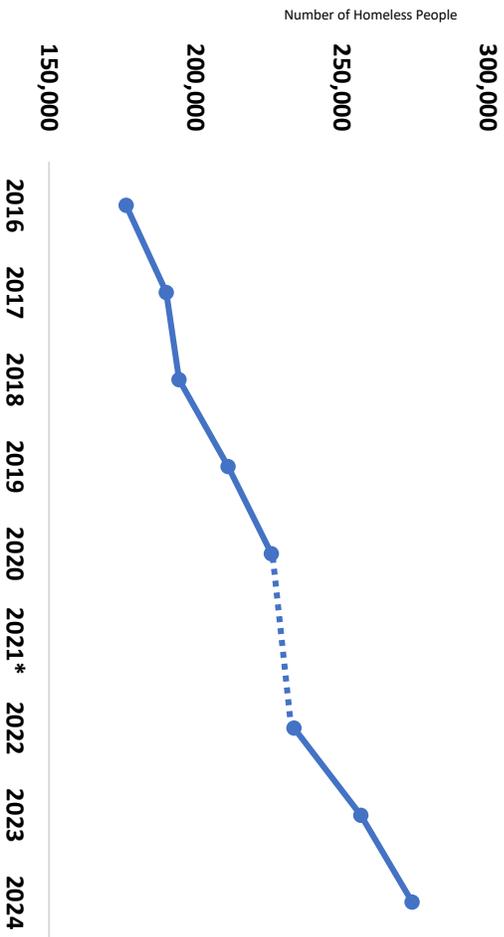
I hereby certify that a copy of the above and foregoing was this date served on all known counsel of record via e-mail.

Baton Rouge, Louisiana, this 19<sup>th</sup> day of December, 2024.

  
\_\_\_\_\_  
John Stone Campbell III

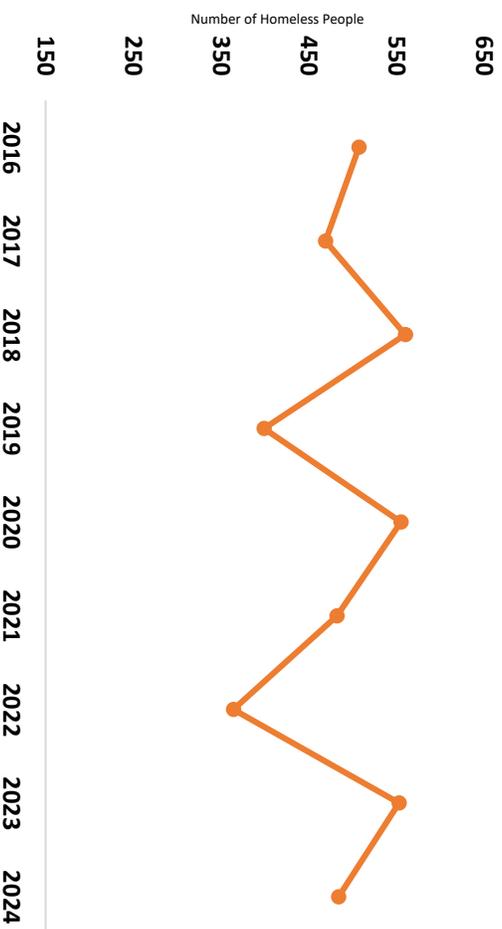
# NATIONAL AND LOCAL TREND LINES IN UNSHELTERED HOMELESSNESS, 2016-2024

## Unsheltered Homelessness Nationally Rises 55% 2016-2024



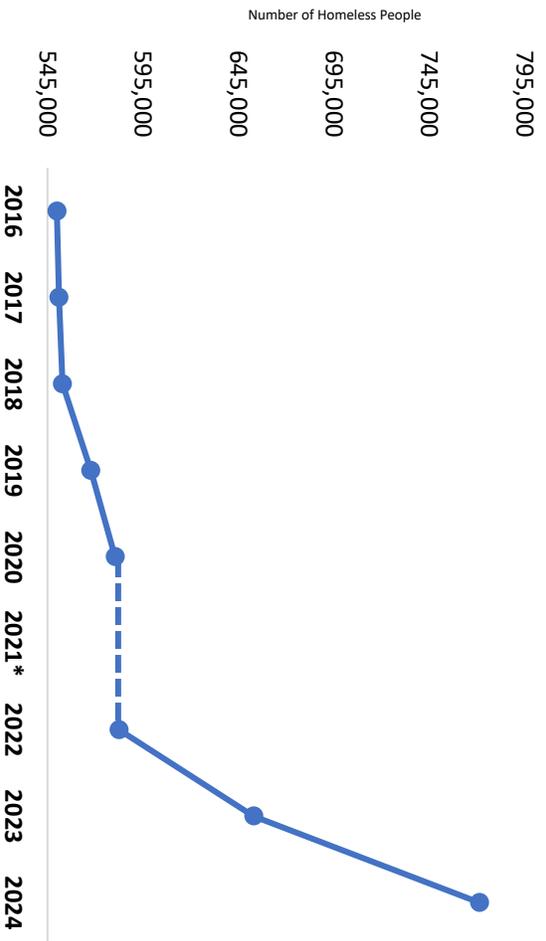
\*The 2021 National PIT count was disrupted because of the COVID-19 pandemic. HUD did not require a street count, although UNITY did one anyway.

## Unsheltered Homelessness Local Decreases by 5% 2016-2024



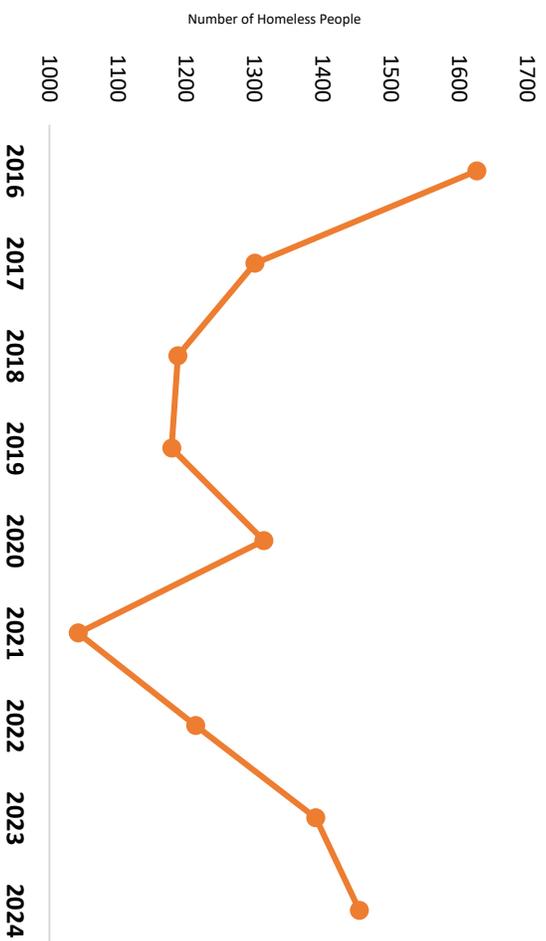
# NATIONAL AND LOCAL TREND LINES IN HOMELESSNESS, 2016-2024

Homelessness Nationally Rises 40% 2016-2024



\*The 2021 National PIT count was disrupted because of the COVID-19 pandemic. HUD did not require a street count, although UNITY did one anyway.

Homelessness Locally Decreases by 11% 2016-2024



Attachment 1

COVID-19 Initiative

## **COVID-19 Hotel Initiative**

Unlike most natural disasters, the COVID-19 pandemic was a disaster that directly impacted everyone, including those responding to protect and provide services to those most vulnerable. At a time when everyone was told the safest action was to stay home for the safety of themselves and others, UNITY of Greater New Orleans worked closely with the City of New Orleans and Louisiana Housing Corporation (LHC) with the support of the Governor's Office. This initiative led the way to provide safe and secure housing options to those that among the most vulnerable - Louisiana's unhoused individuals and families.

As a result of quick support by the Governor in issuing the *Governor's Health Emergency Declaration*, the initiative was able to address the lack of non-congregate or individual sheltering resources for the homeless by initiating the FEMA-funded **COVID-19 Non-Congregate Sheltering (NCS) Program**.

This effort, which had never been done in this magnitude and speed before, was successful thanks to active support and partnerships with federal, state and local government as well as non-profit coalitions on homelessness and housing including: Federal Emergency Management Agency (FEMA), the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), the City of New Orleans, UNITY of Greater New Orleans, and local rapid rehousing providers.

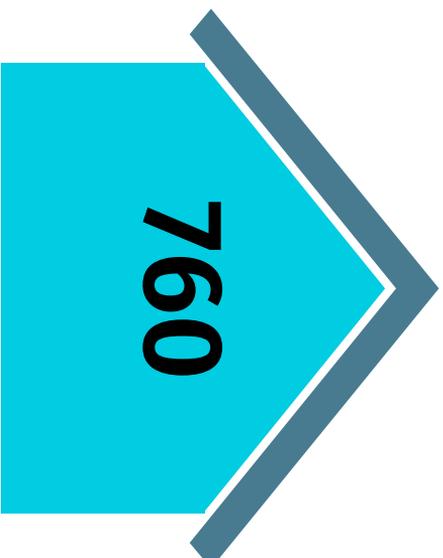
The NCS homeless service providers were able to provide much needed services to people who became connected mainly due to the threat of exposure to COVID-19. In addition to providing a hotel room where people could follow COVID-19 CDC distancing guidelines, people received meals, laundry services, identification, and enrollment in mainstream benefits including access to services like behavioral health and permanent housing programs. This cross-sector collaboration reemphasizes that housing is a health care issue where the benefits far outweigh the costs of the provision of housing.

- The initiative included 1,013 people experiencing unsheltered homelessness in New Orleans and Jefferson Parish from March 17, 2020, to May 31, 2022, and August 23, 2021, to January 25, 2022.
- Including 760 people permanently housed in New Orleans and Jefferson Parish. And of that number 90% were still in permanent housing as of December 31, 2024.

# Pandemic Hotel/Apartment Initiative Number of Formerly Homeless People Permanently Housed in New Orleans and Jefferson Parish



**Number of people moved off the streets into hotels between 3/17/20 – 5/31/22 and 8/23/21 – 1/25/22**



**Number of the people in permanently housed during the Pandemic Hotel/ Apartment Initiative**



**Of the 760 unsheltered people permanently housed during the Pandemic Hotel/ Apartment Initiative, 90 percent are still in permanent housing as of Dec. 31, 2024**

In addition, 126 veterans and 21 domestic violence survivors living on the street were permanently housed in veteran and domestic violence programs. They are not included in the 760 figure because their housing retention data is not readily available.

Source: UNITY HMIS and Coordinated Entry Data

**Attachment 2:**

**System Performance Reports**

## 2023 HDX Competition Report

### PIT Count Data for LA-503 - New Orleans/Jefferson Parish CoC

#### Homeless Households with Children PIT Counts

	2020 PIT	2021 PIT *	2022 PIT	2023 PIT
<b>Total Sheltered and Unsheltered Count of the Number of Homeless Households with Children</b>	<b>51</b>	<b>18</b>	<b>32</b>	<b>58</b>
Sheltered Count of Homeless Households with Children	51	18	32	56
Unsheltered Count of Homeless Households with Children	0	0	0	2

#### Homeless Veteran PIT Counts

	2011 PIT	2020 PIT	2021 PIT *	2022 PIT	2023 PIT
<b>Total Sheltered and Unsheltered Count of the Number of Homeless Veterans</b>	<b>515</b>	<b>113</b>	<b>138</b>	<b>122</b>	<b>107</b>
Sheltered Count of Homeless Veterans	95	103	138	118	96
Unsheltered Count of Homeless Veterans	420	10	0	4	11

\*For CoCs that did not conduct an unsheltered count in 2021, 2020 data were used.

# 2023 HDX Competition Report

## HIC Data for LA-503 - New Orleans/Jefferson Parish Coc

### HMIS Bed Coverage Rates

Project Type	Total Year Round Current Beds	Total Current Year Round HMIS Beds	Total Year Round Current Non-HMIS Beds	HMIS Bed Coverage Rate for Year Round Beds	Total Year Round Current Beds	Total Year Round Current Non-HMIS Beds	HMIS Bed Coverage Rate for Current Beds	Total Current Year Round HMIS Beds	HMIS Bed Coverage Rate for Current Beds
ES Beds	821	786	803	97.88%	18	18	100.00%	804	97.93%
SH Beds	34	34	34	100.00%	0	0	NA	34	100.00%
TH Beds	188	160	160	100.00%	28	28	100.00%	188	100.00%
RRH Beds	1,175	844	844	100.00%	331	331	100.00%	1,175	100.00%
PSH Beds	3,666	3,635	3,655	99.45%	11	11	100.00%	3,646	99.45%
OPH Beds	239	20	20	NA	0	0	NA	20	8.37%
<b>Total Beds</b>	<b>6,123</b>	<b>5,479</b>	<b>5,516</b>	<b>99.33%</b>	<b>388</b>	<b>388</b>	<b>100.00%</b>	<b>5,867</b>	<b>95.82%</b>

**2023 HDX Competition Report  
HIC Data for LA-503 - New Orleans/Jefferson Parish Coc**

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# 2023 HDX Competition Report

## HIC Data for LA-503 - New Orleans/Jefferson Parish Coc

**Notes**

\*For OPH Beds, this does NOT include any beds that are Current, Non-VSP, Non-HMIS, and EHV-funded.  
 \*\*For OPH Beds, this does NOT include any beds that are Current, VSP, Non-HMIS, and EHV-funded.  
 In the HIC, "Year-Round Beds" is the sum of "Beds HH w/o Children", "Beds HH w/ Children", and "Beds HH w/ only Children". This does not include Overflow ("OV Beds") or Seasonal Beds ("Total Seasonal Beds").  
 In the HIC, Current beds are beds with an "Inventory Type" of "C" and not beds that are Under Development ("Inventory Type" of "U").

### PSH Beds Dedicated to Persons Experiencing Chronic Homelessness

Chronically Homeless Bed Counts	2020 HIC	2021 HIC	2022 HIC	2023 HIC
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homeless persons identified on the HIC	2110	2110	2110	2000

### Rapid Rehousing (RRH) Units Dedicated to Persons in Household with Children

Households with Children	2020 HIC	2021 HIC	2022 HIC	2023 HIC
RRH units available to serve families on the HIC	170	232	222	250

### Rapid Rehousing Beds Dedicated to All Persons

All Household Types	2020 HIC	2021 HIC	2022 HIC	2023 HIC
RRH beds available to serve all populations on the HIC	796	1149	870	1175

**2023 HDX Competition Report**  
**HIC Data for LA-503 - New Orleans/Jefferson Parish CoC**

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## 2023 HDX Competition Report FY2022 - Performance Measurement Module (Sys PM)

	Universe (Persons)		Average LOT Homeless (bed nights)			Median LOT Homeless (bed nights)		
	Submitted FY 2021	FY 2022	Submitted FY 2021	FY 2022	Difference	Submitted FY 2021	FY 2022	Difference
1.1 Persons in ES, SH, and PH (prior to "housing move in")	4332	5236	374	363	-11	49	58	9
1.2 Persons in ES, SH, TH, and PH (prior to "housing move in")	6566	5383	342	365	23	177	64	-113

# 2023 HDX Competition Report FY2022 - Performance Measurement Module (Sys PM)

## Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HIMS for up to two years after their initial exit.

	FY 2022	% of Returns						
Exit was from SO	155	1%	7	5%	6	4%	15	10%
Exit was from ES	1532	1%	13	1%	11	1%	40	3%
Exit was from TH	221	1%	2	1%	2	1%	5	2%
Exit was from SH	7	0%	0	0%	0	0%	0	0%
Exit was from PH	846	1%	5	1%	2	0%	19	2%
TOTAL Returns to Homelessness	2761	1%	27	1%	21	1%	79	3%

## Measure 3: Number of Homeless Persons

Metric 3.1 – Change in PIT Counts

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# 2023 HDX Competition Report

## FY2022 - Performance Measurement Module (Sys PM)

This measures the change in PIT counts of sheltered and unsheltered homeless person as reported on the PIT (not from HMIS).

	January 2021 PIT Count	January 2022 PIT Count	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	1042	1214	172
Emergency Shelter Total	397	728	331
Safe Haven Total	15	20	5
Transitional Housing Total	148	102	-46
Total Sheltered Count	560	850	290
Unsheltered Count	482	364	-118

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### Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

	Submitted FY 2021	FY 2022	Difference
Universe: Unduplicated Total sheltered homeless persons	4104	5490	1386
Emergency Shelter Total	3859	5261	1402
Safe Haven Total	57	86	29
Transitional Housing Total	474	458	-16

## 2023 HDX Competition Report FY2022 - Performance Measurement Module (Sys PM)

### Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

Metric 4.1 – Change in earned income for adult system stayers during the reporting period

	Submitted FY 2021	FY 2022	Difference
Universe: Number of adults (system stayers)	2000	1947	-53
Number of adults with increased earned income	108	74	-34
Percentage of adults who increased earned income	5%	4%	-1%

Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period

	Submitted FY 2021	FY 2022	Difference
Universe: Number of adults (system stayers)	2000	1947	-53
Number of adults with increased non-employment cash income	663	487	-176
Percentage of adults who increased non-employment cash income	33%	25%	-8%

Metric 4.3 – Change in total income for adult system stayers during the reporting period

	Submitted FY 2021	FY 2022	Difference
Universe: Number of adults (system stayers)	2000	1947	-53
Number of adults with increased total income	705	552	-153
Percentage of adults who increased total income	35%	28%	-7%

## 2023 HDX Competition Report FY2022 - Performance Measurement Module (Sys PM)

Metric 4.4 – Change in earned income for adult system leavers

	Submitted FY 2021	FY 2022	Difference
Universe: Number of adults who exited (system leavers)	457	406	-51
Number of adults who exited with increased earned income	73	77	4
Percentage of adults who increased earned income	16%	19%	3%

Metric 4.5 – Change in non-employment cash income for adult system leavers

	Submitted FY 2021	FY 2022	Difference
Universe: Number of adults who exited (system leavers)	457	406	-51
Number of adults who exited with increased non-employment cash income	150	138	-12
Percentage of adults who increased non-employment cash income	33%	34%	1%

Metric 4.6 – Change in total income for adult system leavers

	Submitted FY 2021	FY 2022	Difference
Universe: Number of adults who exited (system leavers)	457	406	-51
Number of adults who exited with increased total income	203	189	-14
Percentage of adults who increased total income	44%	47%	3%

# 2023 HDX Competition Report

## FY2022 - Performance Measurement Module (Sys PM)

### Measure 5: Number of persons who become homeless for the 1st time

Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

	Submitted FY 2021	FY 2022	Difference
Universe: Person with entries into ES, SH or TH during the reporting period.	3696	5092	1396
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	1032	1119	87
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)	2664	3973	1309

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

	Submitted FY 2021	FY 2022	Difference
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	4570	6030	1460
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	1412	1341	-71
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)	3158	4689	1531

2023 HDX Competition Report  
**FY2022 - Performance Measurement Module (Sys PM)**

**Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD's Homeless Definition in CoC Program-funded Projects**

This Measure is not applicable to CoCs in FY2022 (Oct 1, 2021 - Sept 30, 2022) reporting period.

**Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing**

Metric 7a.1 – Change in exits to permanent housing destinations

	Submitted FY 2021	FY 2022	Difference
Universe: Persons who exit Street Outreach	328	569	241
Of persons above, those who exited to temporary & some institutional destinations	63	110	47
Of the persons above, those who exited to permanent housing destinations	165	286	121
% Successful exits	70%	70%	0%

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Metric 7b.1 – Change in exits to permanent housing destinations

# 2023 HDX Competition Report

## FY2022 - Performance Measurement Module (Sys PM)

	Submitted FY 2021	FY 2022	Difference
Universe: Persons in ES, SH, TH and PH-RRH who exited, plus persons in other PH projects who exited without moving into housing	3607	4229	622
Of the persons above, those who exited to permanent housing destinations	2611	2635	24
% Successful exits	72%	62%	-10%

### Metric 7b.2 – Change in exit to or retention of permanent housing

	Submitted FY 2021	FY 2022	Difference
Universe: Persons in all PH projects except PH-RRH	3734	3798	64
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	3645	3749	104
% Successful exits/retention	98%	99%	1%

**2023 HDX Competition Report  
 FY2022 - SysPM Data Quality  
 LA-503 - New Orleans/Jefferson Parish CoC**

	All ES, SH			All TH			All PSH, OPH			All RRH			All Street Outreach		
	Submitted FY2020	Submitted FY2021	FY2022	Submitted FY2020	Submitted FY2021	FY2022									
1. Number of non-DV Beds on HIC	692	374	624	272	229	212	3277	3388	3709	714	878	518			
2. Number of HMIS Beds	680	362	612	272	229	212	3257	3368	3367	714	878	518			
3. HMIS Participation Rate from HIC (%)	98.27	96.79	98.08	100.00	100.00	100.00	99.39	99.41	90.78	100.00	100.00	100.00			
4. Unduplicated Persons Served (HMIS)	5085	4284	5084	535	437	466	3912	4280	4024	1864	1451	1474	1061	508	2141
5. Total Leavers (HMIS)	5085	3709	4297	301	326	336	289	339	263	634	712	706	491	186	635
6. Destination of Don't Know, Refused, or Missing (HMIS)	1401	527	244	59	55	64	9	65	18	12	6	4	6	10	17
7. Destination Error Rate (%)	27.55	14.21	5.68	19.60	16.87	19.05	3.11	19.17	6.84	1.89	0.84	0.57	1.22	5.38	2.68

**2023 HDX Competition Report**  
**FY2022 - SysPM Data Quality**

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## 2022 HDX Competition Report

### PIT Count Data for LA-503 - New Orleans/Jefferson Parish CoC

#### Total Population PIT Count Data

	2019 PIT	2020 PIT	2021 PIT *	2022 PIT
Total Sheltered and Unsheltered Count	1179	1314	1042	1214
Emergency Shelter Total	546	529	397	728
Safe Haven Total	31	23	15	20
Transitional Housing Total	172	207	148	102
Total Sheltered Count	749	759	560	850
Total Unsheltered Count	430	555	482	364

#### Chronically Homeless PIT Counts

	2019 PIT	2020 PIT	2021 PIT *	2022 PIT
Total Sheltered and Unsheltered Count of Chronically Homeless Persons	146	113	32	47
Sheltered Count of Chronically Homeless Persons	85	57	32	44
Unsheltered Count of Chronically Homeless Persons	61	56	0	3

## 2022 HDX Competition Report

### PIT Count Data for LA-503 - New Orleans/Jefferson Parish CoC

#### Homeless Households with Children PIT Counts

	2019 PIT	2020 PIT	2021 PIT *	2022 PIT
Total Sheltered and Unsheltered Count of the Number of Homeless Households with Children	42	51	18	32
Sheltered Count of Homeless Households with Children	42	51	18	32
Unsheltered Count of Homeless Households with Children	0	0	0	0

\*For CoCs that did not conduct an unsheltered count in 2021, 2020 data were used.

#### Homeless Veteran PIT Counts

	2011	2019	2020	2021	2022
Total Sheltered and Unsheltered Count of the Number of Homeless Veterans	515	121	113	138	122
Sheltered Count of Homeless Veterans	95	111	103	138	118
Unsheltered Count of Homeless Veterans	420	10	10	0	4

## 2022 HDX Competition Report

### HIC Data for LA-503 - New Orleans/Jefferson Parish CoC

#### HMIS Bed Coverage Rate

Project Type	Total Beds in 2022 HIC	Total Beds in 2022 HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ES) Beds	613	23	578	97.97%
Safe Haven (SH) Beds	34	0	34	100.00%
Transitional Housing (TH) Beds	214	2	212	100.00%
Rapid Re-Housing (RRH) Beds	870	352	547	105.60%
Permanent Supportive Housing (PSH) Beds	3379	12	3347	99.41%
Other Permanent Housing (OPH) Beds	342	0	20	5.85%
<b>Total Beds</b>	<b>5,452</b>	<b>389</b>	<b>4,738</b>	<b>93.58%</b>

## 2022 HDX Competition Report

### HIC Data for LA-503 - New Orleans/Jefferson Parish CoC

#### HMIS Bed Coverage Rate

Project Type	Total Year-Round, Current Beds	Total Year-Round, VSP Beds	Total-Year Round, Current HMIS Beds	Total Year-Round, Current Non-VSP Beds	HMIS Bed Coverage Rate for Year-Round Beds
Emergency Shelter (ES) Beds	613	23	578	590	97.97%
Safe Haven (SH) Beds	34	0	34	34	100.00%
Transitional Housing (TH) Beds	214	2	212	212	100.00%
Rapid Re-Housing (RRH) Beds	870	323	547	547	105.60%
Permanent Supportive Housing (PSH) Beds	3379	12	3347	3367	99.41%
Other Permanent Housing (OPH) Beds	342	0	20	342	5.85%
<b>Total Beds</b>	<b>5,452</b>	<b>360</b>	<b>4,738</b>	<b>5092</b>	<b>93.58%</b>

## 2022 HDX Competition Report HIC Data for LA-503 - New Orleans/Jefferson Parish CoC

### PSH Beds Dedicated to Persons Experiencing Chronic Homelessness

Chronically Homeless Bed Counts	2019 HIC	2020 HIC	2021 HIC	2022 HIC
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homeless persons identified on the HIC	2190	2110	2110	2110

### Rapid Rehousing (RRH) Units Dedicated to Persons in Household with Children

Households with Children	2019 HIC	2020 HIC	2021 HIC	2022 HIC
RRH units available to serve families on the HIC	140	170	232	222

### Rapid Rehousing Beds Dedicated to All Persons

All Household Types	2019 HIC	2020 HIC	2021 HIC	2022 HIC
RRH beds available to serve all populations on the HIC	634	796	1149	870

## 2022 HDX Competition Report

### FY2021 - Performance Measurement Module (Sys PM)

#### Summary Report for LA-503 - New Orleans/Jefferson Parish Coc

##### Measure 1: Length of Time Persons Remain Homeless

This measure tracks the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than October, 1, 2012.

**Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects.**  
**Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.**

a. This measure is of the client's entry, exit, and bed night dates strictly as entered in the HMIS system.

	Universe (Persons)		Average LOT Homeless (bed nights)			Median LOT Homeless (bed nights)		
	Submitted FY 2020	FY 2021	Submitted FY 2020	FY 2021	Difference	Submitted FY 2020	FY 2021	Difference
1.1. Persons in ES and SH	4177	3873	55	48	-7	22	14	-8
1.2. Persons in ES, SH, and TH	4375	3944	68	59	-9	31	19	-12

b. Due to changes in DS Element 3.17, metrics for measure (b) will not be reported in 2016.

This measure includes data from each client's "Length of Time on Street, in an Emergency Shelter, or Safe Haven" (Data Standards element 3.17) response and prepends this answer to the client's entry date effectively extending the client's entry date backward in time. This "adjusted entry date" is then used in the calculations just as if it were the client's actual entry date.

NOTE: Due to the data collection period for this year's submission, the calculations for this metric are based on the data element 3.17 that was active in HMIS from 10/1/2015 to 9/30/2016. This measure and the calculation in the SPM specifications will be updated to reflect data element 3.917 in time for next year's submission.

## 2022 HDX Competition Report

### FY2021 - Performance Measurement Module (Sys PM)

	Universe (Persons)		Average LOT Homeless (bed nights)			Median LOT Homeless (bed nights)		
	Submitted FY 2020	FY 2021	Submitted FY 2020	FY 2021	Difference	Submitted FY 2020	FY 2021	Difference
1.1 Persons in ES, SH, and PH (prior to "housing move in")	5135	4332	416	374	-42	77	49	-28
1.2 Persons in ES, SH, TH, and PH (prior to "housing move in")	5327	6566	418	342	-76	84	177	93

## 2022 HDX Competition Report

### FY2021 - Performance Measurement Module (Sys PM)

#### Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

	Total # of Persons who Exited to a Permanent Housing Destination (2 Years Prior)	Returns to Homelessness in Less than 6 Months		Returns to Homelessness from 6 to 12 Months		Returns to Homelessness from 13 to 24 Months		Number of Returns in 2 Years	
		FY 2021	% of Returns	FY 2021	% of Returns	FY 2021	% of Returns	FY 2021	% of Returns
Exit was from SO	177	7	4%	2	1%	3	2%	12	7%
Exit was from ES	1782	20	1%	8	0%	6	0%	34	2%
Exit was from TH	301	1	0%	7	2%	3	1%	11	4%
Exit was from SH	18	0	0%	0	0%	1	6%	1	6%
Exit was from PH	765	15	2%	11	1%	13	2%	39	5%
<b>TOTAL Returns to Homelessness</b>	<b>3043</b>	<b>43</b>	<b>1%</b>	<b>28</b>	<b>1%</b>	<b>26</b>	<b>1%</b>	<b>97</b>	<b>3%</b>

#### Measure 3: Number of Homeless Persons

##### Metric 3.1 – Change in PIT Counts

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## 2022 HDX Competition Report

### FY2021 - Performance Measurement Module (Sys PM)

This measures the change in PIT counts of sheltered and unsheltered homeless person as reported on the PIT (not from HMIS).

	January 2020 PIT Count	January 2021 PIT Count	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	1314	1042	-272
Emergency Shelter Total	529	397	-132
Safe Haven Total	23	15	-8
Transitional Housing Total	207	148	-59
Total Sheltered Count	759	560	-199
Unsheltered Count	555	482	-73

#### Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

	Submitted FY 2020	FY 2021	Difference
Universe: Unduplicated Total sheltered homeless persons	4478	4104	-374
Emergency Shelter Total	4230	3859	-371
Safe Haven Total	63	57	-6
Transitional Housing Total	524	474	-50

## 2022 HDX Competition Report

### FY2021 - Performance Measurement Module (Sys PM)

#### Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

Metric 4.1 – Change in earned income for adult system stayers during the reporting period

	Submitted FY 2020	FY 2021	Difference
Universe: Number of adults (system stayers)	2036	2000	-36
Number of adults with increased earned income	165	108	-57
Percentage of adults who increased earned income	8%	5%	-3%

Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period

	Submitted FY 2020	FY 2021	Difference
Universe: Number of adults (system stayers)	2036	2000	-36
Number of adults with increased non-employment cash income	620	663	43
Percentage of adults who increased non-employment cash income	30%	33%	3%

Metric 4.3 – Change in total income for adult system stayers during the reporting period

	Submitted FY 2020	FY 2021	Difference
Universe: Number of adults (system stayers)	2036	2000	-36
Number of adults with increased total income	678	705	27
Percentage of adults who increased total income	33%	35%	2%

## 2022 HDX Competition Report

### FY2021 - Performance Measurement Module (Sys PM)

Metric 4.4 – Change in earned income for adult system leavers

	Submitted FY 2020	FY 2021	Difference
Universe: Number of adults who exited (system leavers)	446	457	11
Number of adults who exited with increased earned income	66	73	7
Percentage of adults who increased earned income	15%	16%	1%

Metric 4.5 – Change in non-employment cash income for adult system leavers

	Submitted FY 2020	FY 2021	Difference
Universe: Number of adults who exited (system leavers)	446	457	11
Number of adults who exited with increased non-employment cash income	110	150	40
Percentage of adults who increased non-employment cash income	25%	33%	8%

Metric 4.6 – Change in total income for adult system leavers

	Submitted FY 2020	FY 2021	Difference
Universe: Number of adults who exited (system leavers)	446	457	11
Number of adults who exited with increased total income	170	203	33
Percentage of adults who increased total income	38%	44%	6%

## 2022 HDX Competition Report

### FY2021 - Performance Measurement Module (Sys PM)

#### Measure 5: Number of persons who become homeless for the 1st time

Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

	Submitted FY 2020	FY 2021	Difference
Universe: Person with entries into ES, SH or TH during the reporting period.	4264	3696	-568
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	1352	1032	-320
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)	2912	2664	-248

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

	Submitted FY 2020	FY 2021	Difference
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	4939	4570	-369
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	1641	1412	-229
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)	3298	3158	-140

2022 HDX Competition Report  
**FY2021 - Performance Measurement Module (Sys PM)**

**Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD's Homeless Definition in CoC Program-funded Projects**

**This Measure is not applicable to CoCs in FY2021 (Oct 1, 2020 - Sept 30, 2021) reporting period.**

**Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing**

Metric 7a.1 – Change in exits to permanent housing destinations

	Submitted FY 2020	FY 2021	Difference
Universe: Persons who exit Street Outreach	452	328	-124
Of persons above, those who exited to temporary & some institutional destinations	74	63	-11
Of the persons above, those who exited to permanent housing destinations	318	165	-153
% Successful exits	87%	70%	-17%

Metric 7b.1 – Change in exits to permanent housing destinations

## 2022 HDX Competition Report

### FY2021 - Performance Measurement Module (Sys PM)

	Submitted FY 2020	FY 2021	Difference
Universe: Persons in ES, SH, TH and PH-RRH who exited, plus persons in other PH projects who exited without moving into housing destinations	3578	3607	29
Of the persons above, those who exited to permanent housing destinations	2555	2611	56
% Successful exits	71%	72%	1%

#### Metric 7b.2 – Change in exit to or retention of permanent housing

	Submitted FY 2020	FY 2021	Difference
Universe: Persons in all PH projects except PH-RRH	3333	3734	401
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	3285	3645	360
% Successful exits/retention	99%	98%	-1%

**2022 HDX Competition Report  
 FY2021 - SysPM Data Quality  
 LA-503 - New Orleans/Jefferson Parish CoC**

	All ES, SH			All TH			All PSH, OPH			All RRH			All Street Outreach		
	Submitted FY2019	Submitted FY2020	FY2021	Submitted FY2019	Submitted FY2020	FY2021									
1. Number of non-DV Beds on HIC	764	692	374	252	272	229	3393	3277	3388	583	714	878			
2. Number of HMIS Beds	652	680	362	180	272	229	2993	3257	3368	583	714	878			
3. HMIS Participation Rate from HIC ( % )	85.34	98.27	96.79	71.43	100.00	100.00	88.21	99.39	99.41	100.00	100.00	100.00			
4. Unduplicated Persons Served (HMIS)	5992	5085	4284	491	535	437	3166	3912	4280	1694	1864	1451	802	1061	508
5. Total Leavers (HMIS)	3715	5085	3709	408	301	326	364	289	339	926	634	712	318	491	186
6. Destination of Don't Know, Refused, or Missing (HMIS)	1228	1401	527	38	59	55	17	9	65	32	12	6	1	6	10
7. Destination Error Rate (%)	33.06	27.55	14.21	9.31	19.60	16.87	4.67	3.11	19.17	3.46	1.89	0.84	0.31	1.22	5.38

2022 HDX Competition Report  
**FY2021 - SysPM Data Quality**

9/21/2022 6:07:54 PM

**2022 HDX Competition Report**  
**Submission and Count Dates for LA-503 - New Orleans/Jefferson Parish**  
**CoC**

**Date of PIT Count**

	<b>Date</b>	<b>Received HUD Waiver</b>
Date CoC Conducted 2022 PIT Count	2/8/2022	Yes

**Report Submission Date in HDX**

	<b>Submitted On</b>	<b>Met Deadline</b>
2022 PIT Count Submittal Date	5/6/2022	Yes
2022 HIC Count Submittal Date	5/6/2022	Yes
2021 System PM Submittal Date	2/25/2022	Yes

# 2024 HDX Competition Report

## 2024 Competition Report - SPM Data

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

### Measure 1: Length of Time Persons Remain Homeless

This measures the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than the look back stop date or client's date of birth, whichever is later.

Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects.

Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.

a. This measure is of the client's entry, exit, and bed night dates strictly as entered in the HMIS system.

Metric	Universe (Persons)	Average	Median
		LOT Homeless (bed nights)	LOT Homeless (bed nights)
1.1 Persons in ES-EE, ES-NbN, and SH	5,147	51.3	16.0
1.2 Persons in ES-EE, ES-NbN, SH, and TH	5,315	64.3	20.0

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

b. This measure is based on data element 3.917

This measure includes data from each client's Living Situation (Data Standards element 3.917) response as well as time spent in permanent housing projects between Project Start and Housing Move-In. This information is added to the client's entry date, effectively extending the client's entry date backward in time. This "adjusted entry date" is then used in the calculations just as if it were the client's actual entry date.

Metric	Universe (Persons)	Average		Median	
		LOT Homeless (bed nights)	Homeless (bed nights)	LOT Homeless (bed nights)	Homeless (bed nights)
1.1 Persons in ES-EE, ES-NbN, SH, and PH (prior to "housing move in")	5,913	328.0	62.0		
1.2 Persons in ES-EE, ES-NbN, SH, TH, and PH (prior to "housing move in")	6,020	331.0	70.0		

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### Measure 2: Returns to Homelessness for Persons who Exit to Permanent Housing (PH) Destinations

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

Metric	Count	Count	% of Returns	Count	% of Returns <sup>4</sup>	Count	% of Returns <sup>6</sup>	Count	% of Returns <sup>8</sup>
Total # of Persons Exited to a PH Destination (2 Yrs Prior)		Returns to Homelessness in Less than 6 Months (0 - 180 days)		Returns to Homelessness from 6 to 12 Months (181 - 365 days)		Returns to Homelessness from 13 to 24 Months (366 - 730 days)		Number of Returns in 2 Years	
Exit was from SO	155	3	1.9%	6	3.9%	9	5.8%	18	11.6%
Exit was from ES	1,586	13	0.8%	1	0.1%	8	0.5%	22	1.4%
Exit was from TH	226	2	0.9%	3	1.3%	4	1.8%	9	4.0%
Exit was from SH	8	0	0.0%	1	12.5%	1	12.5%	2	25.0%
Exit was from PH	863	12	1.4%	5	0.6%	21	2.4%	38	4.4%
<b>TOTAL Returns to Homelessness</b>	<b>2,838</b>	<b>30</b>	<b>1.1%</b>	<b>16</b>	<b>0.6%</b>	<b>43</b>	<b>1.5%</b>	<b>89</b>	<b>3.1%</b>

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

### Measure 3: Number of Homeless Persons

#### Metric 3.1 - Change in PIT Counts

Please refer to PIT section for relevant data.

#### Metric 3.2 - Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

Metric	Value
Universe: Unduplicated Total sheltered homeless persons	5,914
Emergency Shelter Total	5,570
Safe Haven Total	101
Transitional Housing Total	495

# 2024 HDX Competition Report

## 2024 Competition Report - SPM Data

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

### Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

This measure is divided into six tables capturing employment and non-employment income changes for system leavers and stayers. The project types reported in these metrics are the same for each metric, but the type of income and universe of clients differs. In addition, the projects reported within these tables are limited to CoC-funded projects.

#### Metric 4.1 - Change in earned income for adult system stayers during the reporting period

Metric	Value
Universe: Number of adults (system stayers)	1,967
Number of adults with increased earned income	73
Percentage of adults who increased earned income	3.7%

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

Metric 4.2 - Change in non-employment cash income for adult system stayers during the reporting period

Metric	Value
Universe: Number of adults (system stayers)	1,967
Number of adults with increased non-employment cash income	615
Percentage of adults who increased non-employment cash income	31.3%

Metric 4.3 - Change in total income for adult system stayers during the reporting period

Metric	Value
Universe: Number of adults (system stayers)	1,967
Number of adults with increased total income	672
Percentage of adults who increased total income	34.2%

Metric 4.4 - Change in earned income for adult system leavers

Metric	Value
Universe: Number of adults who exited (system leavers)	577
Number of adults who exited with increased earned income	91
Percentage of adults who increased earned income	15.8%

# 2024 HDX Competition Report

## 2024 Competition Report - SPM Data

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

### Metric 4.5 - Change in non-employment cash income for adult system leavers

Metric	Value
Universe: Number of adults who exited (system leavers)	577
Number of adults who exited with increased non-employment cash income	187
Percentage of adults who increased non-employment cash income	32.4%

### Metric 4.6 - Change in total income for adult system leavers

Metric	Value
Universe: Number of adults who exited (system leavers)	577
Number of adults who exited with increased total income	257
Percentage of adults who increased total income	44.5%

# 2024 HDX Competition Report

## 2024 Competition Report - SPM Data

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

### Measure 5: Number of Persons who Become Homeless for the First Time

This measures the number of people entering the homeless system through ES, SH, or TH (Metric 5.1) or ES, SH, TH, or PH (Metric 5.2) and determines whether they have any prior enrollments in the HMIS over the past two years. Those with no prior enrollments are considered to be experiencing homelessness for the first time.

**Metric 5.1 - Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS**

Metric	Value
Universe: Person with entries into ES-EE, ES-NbN, SH or TH during the reporting period.	5,351
Of persons above, count those who were in ES-EE, ES-NbN, SH, TH or any PH within 24 months prior to their entry during the reporting year.	1,330
Of persons above, count those who did not have entries in ES-EE, ES-NbN, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)	4,021

# 2024 HDX Competition Report

## 2024 Competition Report - SPM Data

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

Metric 5.2 - Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

Metric	Value
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	6,142
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	1,643
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)	4,499

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

#### **Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD's Homeless Definition in CoC Program-funded Projects**

Measure 6 is not applicable to CoCs in this reporting period.

#### **Measure 7: Successful Placement from Street Outreach and Successful Placement in or**

##### **Retention of Permanent Housing**

This measures positive movement out of the homeless system and is divided into three tables: movement off the streets from Street Outreach (Metric 7a.1); movement into permanent housing situations from ES, SH, TH, and RRH (Metric 7b.1); and retention or exits to permanent housing situations from PH (other than PH-RRH).

#### **Metric 7a.1 - Change in SO exits to temp. destinations, some institutional destinations, and permanent housing destinations**

Metric	Value
Universe: Persons who exit Street Outreach	321
Of persons above, those who exited to temporary & some institutional destinations	110
Of the persons above, those who exited to permanent housing destinations	111
% Successful exits	68.9%

**2024 HDX Competition Report**

**2024 Competition Report - SPM Data**

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

**Metric 7b.1 - Change in ES, SH, TH, and PH-RRH exits to permanent housing destinations**

Metric	Value
Universe: Persons in ES-EE, ES-NbN, SH, TH and PH-RRH who exited, plus persons in other PH projects who exited without moving into housing	5,114
Of the persons above, those who exited to permanent housing destinations	3,324
% Successful exits	65.0%

**Metric 7b.2 - Change in PH exits to permanent housing destinations or retention of permanent housing**

Metric	Value
Universe: Persons in all PH projects except PH-RRH who exited after moving into housing, or who moved into housing and remained in the PH project	3,690
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	3,594
% Successful exits/retention	97.4%

## 2024 HDX Competition Report

### 2024 Competition Report - SPM Data

LA-503 - New Orleans/Jefferson Parish CoC

FY 2023 Reporting Year: 10/1/2022 - 9/30/2023

### System Performance Measures Data Quality

Data coverage and quality will allow HUD to better interpret your SPM submissions.

Metric	ALLES, SH	ALL TH	All PSH, OPH	All RRH	All Street Outreach
Unduplicated Persons Served (HMIS)	5,598	494	4,110	1,985	583
Total Leavers (HMIS)	4,852	375	366	1,254	58
Destination of Don't Know, Refused, or Missing (HMIS)	149	3	25	8	14
Destination Error Rate (Calculated)	3.1%	0.8%	6.8%	0.6%	24.1%

## **Attachment 4**

### **Data Tables Cited in Response**

- Individuals Housed from Prioritized Encampments as of December 2024 (Revised Exhibit 10)
- Expenses for HUD Special Funding for Unsheltered Homelessness
- Homeless Expenditures and Housing Outcomes
- Housing Outcomes for Each CoC Project and Project Sponsor
- HUD Scoring of CoC Application for System Performance Measures
- HUD Scoring of CoC Application
- System Performance Benchmarks
- New Orleans Performance on CoC System Performance Measures 2019-2023
- Housing Outcomes Per Calendar Year 2019-2024

Table 1

<b>Individuals* Housed by UNITY from Prioritized Encampments as of December 2024</b>	
<b>Funding Source</b>	<b>Housed from Prioritized Encampments</b>
CoC Permanent Supportive Housing (PSH)	14
CoC PSH - Special HUD Grant	3
CoC PSH - via LHC	9
CoC Rapid Rehousing (RRH) - Special HUD Grant	4
CoC RRH	21
Emergency Rental Assistance Program RRH	117
City American Rescue Plan Act RRH	62
CoC PSH - Special HUD Grant with LHC Vouchers	43
Other Funding Sources	2
<b>Total</b>	<b>275</b>
<b>Individuals Bridged to PSH**</b>	
Housed with ERA/ARPA Transferred to CoC PSH - Special HUD Grant	38
Housed with ERA/ARPA Transferred to CoC PSH	55
Housed with CoC RRH Transferred to CoC PSH - Special HUD Grant	2
<b>TOTAL INDIVIDUALS IN HOUSING WITH CoC PSH - Special HUD Grant</b>	<b>145</b>
<p>* These figures only include individuals from OHSS's list of prioritized encampments. According to OHSS, 822 total individuals have been housed through its Home for Good initiative as of December 2024.</p> <p>** To expedite housing, some participants were initially assisted with ERA/ARPA RRH prior to being bridged to PSH that is now providing rental assistance and supportive services for people with disabling conditions.</p>	
<b>Source:</b> Unaudited data provided by UNITY.	

Table 2

<b>Expenses for HUD Special Funding for Unsheltered Homelessness</b> January 1, 2024 – December 31, 2024				
<b>Project Name</b>	<b>Budget</b>	<b>Expenses Reimbursed as of December 31, 2024</b>	<b>All Expenses through December 31, 2024</b>	<b>% of funds Expended</b>
Services in Permanent Housing	\$4,356,441.00	\$ 1,306,683.71	\$ 1,306,683.71	30%
PSH for People Experiencing Unsheltered Homelessness	\$4,769,982.00	\$ 1,056,907.33	\$ 1,069,735.69	22%
Reducing Unsheltered Homelessness RRH	\$948,153.00	\$ 85,995.80	\$ 85,995.80	9%
Unsheltered Joint Component	4,431,970.00	\$ 604,778.65	\$ 604,778.65	14%
Expanding Street Outreach	434,700.00	\$ 117,319.71	\$ 117,319.71	27%
Improving Access to Shelter	21,294.00		\$ -	0%
<b>TOTAL UNSHELTERED AWARDS</b>	<b>14,962,540.00</b>	<b>\$3,171,685.20</b>	<b>\$3,184,513.56</b>	<b>21%</b>

Table 3

<b>Homelessness Expenditures and Housing Outcomes</b>			
<b>January 2019 through June 2024</b>			
<b>Program</b>	<b>Funding</b>	<b>Total Expenditures**</b>	<b>Housing Outcomes*</b>
Permanent Supportive Housing (PSH)	CoC	\$ 138,115,058	3,718
Rapid Rehousing	CoC & ESG	\$ 31,396,343	2,061
Shelter	ESG	\$ 22,283,610	3,371
Other Housing	CoC	\$ 12,090,457	1,656
COVID-19 Non-Congregate Shelter	ESG & FEMA	\$ 5,699,324	886
Coordinated Entry	CoC	\$ 5,512,329	645
Planning	CoC	\$ 3,377,325	
HMIS	CoC	\$ 2,465,534	
Street Outreach	CoC	\$ 1,017,013	1,068
<b>Combined</b>		<b>\$ 221,956,993</b>	<b>13,598</b>
<p>* Housing Outcomes from HMIS generated report that de-duplicates the number of people who may be served over multiple years. PSH includes people who exited to housing or maintained housing in the program.</p> <p>** Expenditures includes CoC projects that are not subrecipients of UNITY for which data was obtained from expenditure reports submitted to HUD that are verified with HUD drawdown system.</p>			

Table 4

<b>Housing Outcomes of Each CoC Project and Project Sponsor</b> <b>July 1, 2023 - June 30, 2024</b>					
Project Sponsor	Project Name	Component Type	Total Served	People Who Exited	Total in housing or exited to housing
<b>Permanent Supportive Housing</b>					
City of New Orleans	City of New Orleans S+C	PH-PSH	81	3	79
Crescent Care	Partners in Health & Housing (Includes Crescent Care PSH)	PH-PSH	159	18	150
Depaul USA	Coming Home PSH	PH-PSH	16	0	16
Depaul USA	The Journey Home Expansion	PH-PSH	20	0	20
Jefferson Parish Community Development	Jefferson Parish S+C	PH-PSH	31	3	30
Jefferson Parish Human Services Authority	JPHSA Supportive Housing for Persons with Disabilities	PH-PSH	61	15	61
Metropolitan Human Services District	MHSD S+C	PH-PSH	165	30	159
NAMI New Orleans	Permanent Housing and Independent Living PSH	PH-PSH	14	3	12
NAMI New Orleans	The Finally Home Project	PH-PSH	58	10	51
Odyssey House Louisiana	Odyssey House Samaritan	PH-PSH	81	10	80
Ozanam Inn	Home for Good	PH-PSH	79	14	69
Responsibility House, Inc	The Journey Home Expansion	PH-PSH	26	6	26
Responsibility House, Inc.	Pathways PSH	PH-PSH	123	9	119
START Corporation	Home At Last	PH-PSH	108	11	106
START Corporation	Partners in Health & Housing (includes New Start PSH)	PH-PSH	236	37	214
Traveler's Aid Society of Greater New Orleans	The Journey Home	PH-PSH	119	17	118

Traveler's Aid Society of Greater New Orleans	Travelers Aid PSH (formerly Goodwill PSH)	PH-PSH	33	0	33
Volunteers of America	Permanent Housing for People with Disabilities	PH-PSH	96	3	95
UNITY of Greater New Orleans	LAPSHI/ Rebuilding Communities	PH-PSH	1385	134	1360
<b>Rapid Re-Housing - Adult Individuals</b>					
Depaul USA	Rapid Rehousing for Chronically Homeless Persons Project	PH-RRH	30	14	29
Ladies of Hope Ministries	Ladies of Hope RRH (formerly Goodwill RRH)	PH-RRH	20	11	17
Ozanam Inn	RRH to Reduce Homelessness	PH-RRH	46	14	42
START Corporation	Start Rapid Rehousing (Includes RRH to Reduce Unsheltered)	PH-RRH	108	49	98
<b>Rapid Re-Housing -Families, Youth, Survivors</b>					
Catholic Charities Archdiocese of New Orleans	Bridges to Self-Sufficiency	PH-RRH	83	51	76
Covenant House New Orleans	Rapid Rehousing for Survivors	PH-RRH	14	12	10
Covenant House New Orleans	Rapid Rehousing for Youth	PH-RRH	33	2	32
New Orleans Family Justice Center	Rapid Rehousing for Survivors	PH-RRH	226	133	225
New Orleans Women and Children's Shelter	GNO Rapid Rehousing	PH-RRH	152	85	152
Salvation Army	Rapid Response for Families	PH-RRH	135	89	124
Easter Seals	Supporting Survivors RRH	PH-RRH	28	0	28
Ladies of Hope Ministries	Supporting Survivors RRH	PH-RRH	32	0	32
Priority Healthcare	Supporting Survivors RRH	PH-RRH	49	3	50
START Corporation	Rapid Response for Families	TH-RRH	120	65	117
<b>Transitional Housing (TH) and Joint Component (TH-RRH)</b>					

Salvation Army	Rapid Response for Families	TH-RRH	152	108	92
New Orleans Women and Childrens Shelter	New Orleans Women's Shelter TH	TH	154	125	141
Eden House	Next Steps TH-RRH	Th-RRH	44	35	31
Metropolitan Centers for Community Advocacy	Turning Point Project	TH-RRH	99	91	98
New Orleans Family Justice Center	Next Steps TH-RRH	TH-RRH	231	192	231
New Orleans Family Justice Center	Turning Point Project	TH-RRH	104	36	161

*Information compiled from HMIS generated Annual Performance Reports used for project performance ratings.*

Table 5

<b>HUD Scoring of CoC Application for System Performance Measures</b>			
<b>Application Year</b>	<b>Maximum Possible Points for System Performance</b>	<b>UNITY Points</b>	<b>UNITY % of Total</b>
2019	60	38	63.3%
2021	23	20.5	89.1%
2022	59	54	91.5%
2023	60	50	83.3%

Source: HUD Debriefing Documents

Table 6

<b>HUD Scoring of CoC Application</b>					
<b>Application Year</b>	<b>Maximum Possible Score</b>	<b>Highest Scoring Application</b>	<b>Median Score</b>	<b>Upper Quartile</b>	<b>UNITY Score</b>
2019	200	186.5	150.5	168.5	169.5
2021	173	168.25	143	155.6	162.5
2022	200	188.75	154.5	171.6	179.5
2023	200	185.5	151.5	168.5	180.5

Source: HUD Debriefing Documents calculating upper quartile.

Table 7

## System Performance Benchmarks

Measure	Pt in Occ App	System Performance Measure		New Orleans FY21		New Orleans FY22		HUD Benchmark FY23 Application		Achieved (y/n)	
		1	13	# achieved	% achieved	# achieved	% achieved	HUD Goal	Benchmark	Goal	Benchmark
1(a)	8	Median Length of Time Homeless Persons in ES, SH & TH (bed nights in HMS)	19		21	11%	-5%	90 days or less	Goal	yes	Benchmark
2	8	Returns to Homelessness (TOTAL)	# achieved	% achieved	# achieved	% achieved	HUD Goal	Benchmark	Goal	Benchmark	
	3	Returns in less than 6 months	43	1%	31	1%	-1%	5% or less		yes	Benchmark
	3	Returns 6-12 months	28	1%	27	1%	-1%	10% or less		yes	Benchmark
3	12	Number of Homeless Persons	2022 PIT		2023 PIT	Change	Goal	Goal	Goal	Goal	Benchmark
3.1	3	PIT Count	1214		1390	14%	-5%		no	no	Benchmark
	7	Unsheltered	364		553	52%	-5%		no	no	Benchmark
	2	Sheltered	850		837	-2%	-5%		no	no	Benchmark
4	7	Employment & Income Growth	# achieved	% achieved	# achieved	% achieved	Goal	Benchmark	Goal	Benchmark	
4.4	2	% Leavers Increased Earned Income	73	16%	77	3%	Increase	20% or greater	yes	yes	Benchmark
4.5	2	% Leavers Non-Employment Cash Income	150	33%	138	34%	Increase	50% or greater	yes	yes	Benchmark
5	3	First Time Homelessness	# achieved		# achieved	Change	HUD Goal	Benchmark	Goal	Benchmark	
5.2		ES-SH-TH-PH 1st Time Homelessness	3158		4689	48%	Any reduction		No		Benchmark
7	13	Successful Placement or Retention	# achieved	% achieved	# achieved	% achieved	Change	HUD Goal	Benchmark	Goal	Benchmark
7b.1	8	% with Successful ES-SH-TH-PH-RRH Outcome	2611	72%	2635	-10.0%	2%	50%	yes	yes	Benchmark
7b.2	4	% with Successful PH Retention or Exit	3645	98%	3749	1.0%	1%	96%	yes	yes	Benchmark

Table 8

## New Orleans Performance on CoC System Performance Measures 2019-2023

System Performance Measure	Historical Performance				
	FY2019	FY2020	FY2021	FY2022	FY2023
<b>1 Median Length of Time Homeless</b>					
1(a) Persons in ES & SH	19	22	14	16	16
Persons in ES, SH & TH	22	31	19	21	20
1(b) Persons in ES & SH	24	77	49	58	62
Persons in ES, SH & TH	30	84	177	64	70
<b>2 Returns to Homelessness (TOTAL)</b>					
Returns in less than 6 months	3.2%	3.0%	1.0%	1.0%	1.0%
Returns in less than 12 months (includes less than 6 mo.)	6.4%	4.0%	2.0%	2.0%	2.0%
Returns within 24 months	9.5%	7.0%	3.0%	3.0%	3.0%
<b>3 Number of Homeless Persons</b>					
3.1 PIT Count	1,179	1,314	1,042	1,214	1,390
3.2 Total Count in HMIS	4,936	4,478	4,104	5,490	5,914
<b>4 Employment &amp; Income Growth</b>					
4.1 % Stayers Increased Earned Income	8.5%	8.0%	5.0%	4.0%	3.7%
4.2 % Stayers Increased Non-Employment Cash Income	32.9%	30.0%	33.0%	25.0%	31.3%
4.3 % Stayers Increased Total Income	37.0%	33.0%	35.0%	28.0%	34.2%
4.4 % Leavers Increased Earned Income	18.2%	15.0%	16.0%	19.0%	15.8%
4.5 % Leavers Non-Employment Cash Income	33.7%	25.0%	33.0%	34.0%	32.4%
4.6 % Leavers Increase Total Income	47.2%	38.0%	44.0%	47.0%	44.5%
<b>5 First Time Homelessness</b>					
5.1 ES-SH-TH 1st Time Homelessness	3,190	2,912	2,664	3,971	4,021
5.1 ES-SH-TH-PH 1st Time Homelessness	3,707	3,298	3,158	4,689	4,499
<b>6 Not Applicable</b>					
<b>7 Successful Placement or Retention</b>					
7a.1 % with Successful SO Outcome	95%	87%	70%	70%	69%
7b.1 % with Successful ES-SH-TH-PH-RRH Outcome	77%	71%	72%	62%	65%
7b.2 % with Successful PH Retention or Exit	98%	99%	98%	99%	97%

ES= Emergency Shelter; SH= Safe Haven; TH= Transitional Housing; PIT= Point In Time Count; HMIS= Homeless Management Information System; PH= Permanent Housing Program; RRH= Rapid Re-Housing.

Table 9

## HOUSING OUTCOMES Per Calendar Year 2019-2024

Program Type

Calendar Year

<b>Emergency Shelter, Safe Havens, Transitional and Rapid Rehousing</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
People Served	6964	7007	6800	8119	7746	7681
Exits from program	1110	1451	1332	1547	1797	1180
Exits to Permanent Housing	673	865	728	802	680	482
% Exits to Permanent Housing	61%	60%	55%	52%	38%	41%

Street Outreach

	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
People Served	1009	1108	1281	1853	2016	2265
Exits	147	139	110	192	50	214
Exits to permanent housing	56	62	55	82	10	142
% exits to Permanent Housing	38%	45%	50%	43%	20%	66%

<b>Permanent Supportive Housing</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
People entered and remained or exited	3001	2843	2803	2723	2669	2845
Remained Housed or Exited to Permanent Housing	2891	2763	2719	2607	2558	2795
% Retained or exited to Permanent Housing	96%	97%	97%	96%	96%	98%

Data Source: System generated report using System Performance Module for each calendar year.



## APPENDIX B: SCOPE AND METHODOLOGY

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This report provides the results of our performance audit of homelessness initiatives in New Orleans between January 2019 and December 2024. We conducted this performance audit under the provisions of Title 24 of the Louisiana Revised Statutes of 1950, as amended. Our audit objective was:

### **To evaluate homelessness initiatives in New Orleans.**

We conducted this performance audit in accordance with generally-accepted *Government Auditing Standards* issued by the Comptroller General of the United States. 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 objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

During the course of this audit, LLA requested a SQL backup of the Homelessness Management Information System (HMIS) database, as well as access to individual client files, including but not limited to those containing personal identifiable information, as needed to verify data entered into HMIS. However, UNITY did not provide the LLA with access to the HMIS database, which limited some of our audit procedures. LLA issued a demand letter in June 2024 to attempt to access these records, and in August 2024, LLA then issued a legislative subpoena after UNITY did not comply with the demand letter. In response, UNITY, along with the other CoCs in Louisiana, filed a lawsuit. LLA withdrew the subpoenas in January 2025 in order to timely publish the report with the information that was submitted by UNITY and other auditees.

As a result, we were unable to evaluate the outcomes associated with homelessness programs and activities as we initially intended. For example, we could not independently: perform data reliability analyses on the HMIS database or for reports generated by UNITY from the HMIS database; calculate the number of individuals served by each homelessness program and provider; determine overall lengths of stay for individuals in programs or with providers; evaluate outcomes such as whether services and providers were effective at keeping people housed; evaluate the monitoring process to identify if processes could be improved when overseeing providers; determine the number of individuals housed through the targeted encampment decommissioning process; determine available shelter resources, how they were used, and what needs exist; and evaluate the family coordinated entry process to determine wait times, service linkages, and process efficiency. We modified our audit procedures in order to obtain sufficient, appropriate evidence to provide information on funding and services, evaluate overall coordination, and identify processes that could be improved.

We obtained an understanding of internal control that is significant to the audit objective and assessed the design and implementation of such internal control to the extent necessary to address our audit objective. We also obtained an understanding of legal provisions that are significant within the context of the audit objective, and we assessed the risk that illegal acts, including fraud, and violations of applicable contract, grant agreement, or other legal provisions could occur. Based on that risk assessment, we designed and performed procedures to provide reasonable assurance of detecting instances of noncompliance significant to those provisions.

To answer our objective, we performed the following audit steps:

- Met with leadership and staff from the City of New Orleans (the City), which included staff from the Office of Homeless Services and Strategy (OHSS), the Office of Housing Policy and Community Development (OCD), and the New Orleans Health Department (NOHD); the Louisiana Housing Corporation (LHC); and UNITY of Greater New Orleans (UNITY).
- Reviewed federal laws and regulations regarding Continuum of Care (CoC) and Emergency Solutions Grants (ESG) funds, United States Department of Housing and Urban Development (HUD) guidance, and city ordinances.
- Reviewed policies, procedures, and other documentation from the City, LHC, and UNITY regarding homelessness initiatives, including encampment decommissioning.
- Obtained and reviewed homelessness planning documentation from the City and UNITY.
- Met with various stakeholders, including homelessness service providers, to understand their processes and experiences with the City and UNITY.
- Toured homeless shelters in New Orleans, a decommissioned encampment, and an encampment in the process of decommissioning.
- Obtained information from HUD's website regarding CoC and ESG awards, Point-in-Time counts, Housing Inventory Counts, fair market rent information, and other relevant documentation.
- Obtained and analyzed median gross rent data in the New Orleans-Metairie Metropolitan Statistical Area from the United States (U.S.) Census website.
- Conducted a survey of homeless service providers in New Orleans to obtain information about services, feedback about the New Orleans

CoC, experiences with the City and UNITY, and challenges faced by providers.

- We sent the survey to 44 individuals and received 20 responses, resulting in a 45.5% overall response rate. These 20 responses represented 17 of the 30 provider organizations we surveyed, resulting in a 56.7% response rate.
- Conducted a survey of CoCs nationwide to obtain information about other CoCs, including funding and processes.
  - We sent the survey to 551 individuals and received 55 responses, resulting in a 10.0% overall response rate. These responses represented 60 of 391 CoCs, excluding the seven CoCs in Louisiana, for a CoC response rate of 15.3%. Some respondents worked with multiple CoCs. These CoCs represent 27 of 55 states and U.S. territories with HUD-designated CoCs, excluding Louisiana, for a response rate of 49.1%.
- Obtained and analyzed expenditures from the City and UNITY, including payments to providers.
- Reviewed HUD CoC applications to identify the types of services provided, provider information, and requested funding amounts.
- Obtained and analyzed City, LHC, and UNITY contracts.
- Obtained and analyzed fiscal and programmatic compliance monitoring reports from the City, LHC, and UNITY.
- Obtained and analyzed food safety inspections conducted by the Louisiana Department of Health's Office of Public Health.
- Researched information about shelters in New Orleans, including populations served and shelter capacity, using shelter websites and homelessness resource lists from nonprofit organizations.
- Researched other CoC strategic plans and websites.
- Researched challenges facing homelessness response nationwide.
- Reviewed performance audits on homelessness conducted by other states.
- Reviewed state appropriations related to homelessness.
- Provided our results to the City, LHC, and UNITY to review and incorporated edits throughout the report.



## APPENDIX C: HUD AWARDS TO NEW ORLEANS AREA AWARD YEARS 2018 THROUGH 2023

Organization Name	Award Year*						Total
	2018	2019	2020	2021	2022	2023	
<b>Continuum of Care Grants</b>							
UNITY of Greater New Orleans	\$17,501,751	\$18,999,166	\$19,790,532	\$22,385,467	\$40,199,642**	\$28,800,290	<b>\$147,676,848</b>
UNITY of Greater New Orleans ( <i>passed through LHC</i> )	9,452,193	9,680,441	10,460,348	10,835,006	11,023,314	11,436,906	<b>62,888,208</b>
Metropolitan Human Services District	1,306,907	1,318,331	1,396,847	1,432,127	1,432,127	1,540,763	<b>8,427,102</b>
Volunteers of America	1,074,855	1,083,118	1,141,540	1,165,773	1,165,773	1,240,653	<b>6,871,712</b>
City of New Orleans Office of Housing Policy and Community Development	603,726	585,901	624,469	642,133	562,133	609,425	<b>3,627,787</b>
Catholic Charities Archdiocese of New Orleans	313,930	315,946	330,154	198,540	198,540	211,128	<b>1,568,238</b>
Jefferson Parish Department of Community Development	230,436	232,584	247,932	254,952	254,952	276,552	<b>1,497,408</b>
NAMI New Orleans	192,537	193,785	202,833	207,045	207,045	219,837	<b>1,223,082</b>
<b>CoC Total</b>	<b>\$30,676,335</b>	<b>\$32,409,272</b>	<b>\$34,194,655</b>	<b>\$37,121,043</b>	<b>\$55,043,526</b>	<b>\$44,335,554</b>	<b>\$233,780,385</b>
<b>Emergency Solutions Grants</b>							
New Orleans, LA	\$1,012,117	\$1,055,099	\$9,519,647***	\$1,111,557	\$1,112,735	\$1,128,749	<b>\$14,939,904</b>
Jefferson Parish, LA	217,656	218,834	2,568,392***	223,181	218,331	227,773	<b>3,674,167</b>
<b>ESG Total</b>	<b>\$1,229,773</b>	<b>\$1,273,933</b>	<b>\$12,088,039</b>	<b>\$1,334,738</b>	<b>\$1,331,066</b>	<b>\$1,356,522</b>	<b>\$18,614,071</b>
<b>Total Awards</b>	<b>\$31,906,108</b>	<b>\$33,683,205</b>	<b>\$46,282,694</b>	<b>\$38,455,781</b>	<b>\$56,374,592</b>	<b>\$45,692,076</b>	<b>\$252,394,456</b>
<p>* Funds are spent in the year(s) following the award year. Not all awarded funds had been spent at the time of our analysis.  ** CoC funds include a \$14,962,540 special CoC grant for unsheltered homelessness applied for in award year 2022 and finalized in 2023.  *** ESG funds include \$8,412,333 in COVID-19 funds to Orleans Parish and \$2,349,129 to Jefferson Parish awarded in 2020.  <b>Source:</b> Prepared by legislative auditor's staff using information from HUD and LHC</p>							



## APPENDIX D: CITY AND UNITY EXPENDITURES BY FUNDING STREAM JANUARY 2019 THROUGH JUNE 2024

Funding Stream	Description	City	UNITY	Total
CoC	<i>Federal</i> – HUD program designed to promote a community-wide commitment to the goal of ending homelessness and quickly rehouse unhoused individuals.	-	\$109,636,346	<b>\$109,636,346</b>
CoC ( <i>passed through LHC</i> )		-	56,923,545	<b>56,923,545</b>
ESG	<i>Federal</i> – HUD program designed to assist people with quickly regaining stability in permanent housing after experiencing a housing crisis or homelessness. Includes additional funds available due to the COVID-19 pandemic.	\$12,702,867*	7,135,766*	<b>19,838,6338</b>
Community Development Block Grant	<i>Federal</i> – HUD program that supports community development activities to build stronger and more resilient communities. Includes additional funds available due to the COVID-19 pandemic.	10,878,795	-	<b>10,878,795</b>
City General Fund	<i>Local</i> - City funds.	7,558,033	-	<b>7,558,033</b>
Emergency Rental Assistance Program	<i>Federal</i> – United States (U.S.) Department of the Treasury funding to support housing stability for eligible renters throughout the COVID-19 pandemic.	3,312,606	2,014,566	<b>5,327,172</b>
Neighborhood Housing Improvement Fund Neighborhood Stabilization	<i>Local</i> - Fund from special local tax to be used to achieve improved housing conditions and neighborhood stability.	2,241,714	-	<b>2,241,714</b>
Federal Emergency Management Agency (FEMA) ( <i>passed through LHC</i> )	<i>Federal</i> – pre-and post-emergency or disaster related projects supporting critical recovery initiatives.	-	1,547,684	<b>1,547,684</b>
American Rescue Plan Act (ARPA)	<i>Federal</i> – Coronavirus fiscal recovery fund.	1,419,821	-	<b>1,419,821</b>
Substance Abuse and Mental Health Services Administration	<i>Federal</i> – U.S. Department of Health and Human Services funding to advance behavioral health in the nation.	-	886,067	<b>886,067</b>

Funding Stream	Description	City	UNITY	Total
Emergency Housing Voucher Program	<i>Federal</i> – HUD funding for housing choice vouchers to assist individuals experiencing homelessness.	-	\$81,360	<b>\$81,360</b>
<b>Total</b>		<b>\$38,113,836</b>	<b>\$178,225,335</b>	<b>\$216,339,171</b>
<p>* \$5,634,246 of City ESG dollars went to UNITY. These dollars are reflected in the City's total for ESG.  <b>Source:</b> Prepared by legislative auditor's staff using information from the City and UNITY.</p>				

## APPENDIX E: EXPENDITURES FOR HOMELESSNESS INITIATIVES BY PROVIDER AND CALENDAR YEAR JANUARY 2019 THROUGH JUNE 2024

Project Type Legend			
Acronym	Project Type	Acronym	Project Type
CE	Coordinated Entry	PSH	Permanent Supportive Housing
COVID NCS	COVID Non-Congregate Shelter	RRH	Rapid Rehousing
EHV	Emergency Housing Vouchers	SH	Safe Haven
ES	Emergency Shelter	SO	Street Outreach
HMIS	Homeless Management Information System	SS	Supportive Services
Joint TH-RRH	Joint Transitional Housing and Rapid Rehousing	TH	Transitional Housing
PATH	Project for Assistance in Transition from Homelessness		

Provider Name	Project Type	Primary Funding	CY 19	CY 20	CY 21	CY 22	CY 23	CY 24*	Total
Catholic Charities Archdiocese of New Orleans	PSH	CoC	\$549,172	\$406,905	\$189,516	\$82,746	\$129,990	\$8,487	\$1,366,818
City of New Orleans/Health Care for the Homeless	RRH	ESG	-	-	19,032	42,953	-	-	61,985
Covenant House	CE	CoC	37,627	23,519	43,164	41,999	22,177	22,355	190,840
	ES	ESG	104,606	163,139	150,854	228,231	340,436	364,619	1,351,886
	PSH	CoC	219,268	168,921	223,108	113,621	178,139	91,557	994,614
	RRH	CoC	204,048	454,103	442,752	412,232	668,683	208,092	2,389,910
	<b>Provider Total</b>			<b>\$565,549</b>	<b>\$809,682</b>	<b>\$859,877</b>	<b>\$796,084</b>	<b>\$1,209,435</b>	<b>\$686,623</b>
Depaul USA	PSH	CoC	\$93,510	\$142,231	\$143,555	\$137,252	\$123,174	\$206,141	\$845,863

Provider Name	Project Type	Primary Funding	CY 19	CY 20	CY 21	CY 22	CY 23	CY 24*	Total
	RRH	CoC/ESG	184,215	147,900	498,308	386,033	182,403	77,911	1,476,770
	<b>Provider Total</b>		<b>\$277,726</b>	<b>\$290,131</b>	<b>\$641,863</b>	<b>\$523,284</b>	<b>\$305,577</b>	<b>\$284,053</b>	<b>\$2,322,634</b>
Easter Seals	Joint TH-RRH	CoC	-	-	-	-	-	\$43,061	\$43,061
	PSH	CoC	-	-	-	-	\$84,248	84,223	168,472
	RRH	CoC/ESG	-	-	\$19,409	\$75,245	171,049	102,872	368,575
	<b>Provider Total</b>		<b>-</b>	<b>-</b>	<b>\$19,409</b>	<b>\$75,245</b>	<b>\$255,297</b>	<b>\$230,156</b>	<b>\$580,108</b>
Eden House	Joint TH-RRH	CoC	-	-	-	-	\$354,006	\$152,861	\$506,867
First Evangelist	PSH	CoC	\$338,568	\$214,051	\$250,736	\$106,631	5,543	-	915,529
Goodwill Industries of Southeast Louisiana	PSH	CoC	301,313	266,919	259,856	301,695	361,719	138,834	1,630,337
	RRH	CoC/ESG	173,185	204,608	591,468	287,355	209,164	105,160	1,570,941
	<b>Provider Total</b>		<b>\$474,499</b>	<b>\$471,528</b>	<b>\$851,324</b>	<b>\$589,050</b>	<b>\$570,883</b>	<b>\$243,994</b>	<b>\$3,201,277</b>
Grace at the Green Light Inc.	CE	CoC	-	-	\$57,571	\$57,107	\$56,367	\$23,083	\$194,128
	SS	ESG	\$10,000	-	20,000	-	69,158	-	99,158
	<b>Provider Total</b>		<b>\$10,000</b>	<b>-</b>	<b>\$77,571</b>	<b>\$57,107</b>	<b>\$125,525</b>	<b>\$23,083</b>	<b>\$293,286</b>
Harry Tompson Center	CE	CoC	\$85,055	\$77,333	\$77,550	\$85,801	\$44,520	\$81,562	\$451,822
	ES	ESG	64,729	123,988	79,252	118,503	105,129	55,460	547,061
	PSH	CoC	10,350	11,236	11,210	8,693	-	-	41,488
	RRH	CoC	13,097	10,529	12,417	13,511	11,786	4,277	65,617
	<b>Provider Total</b>		<b>\$173,231</b>	<b>\$223,085</b>	<b>\$180,429</b>	<b>\$226,507</b>	<b>\$161,436</b>	<b>\$141,300</b>	<b>\$1,105,988</b>
Hotel Hope	ES	ESG	\$50,000	\$49,045	\$182,877	\$102,122	\$60,000	\$17,650	\$461,694
Jefferson Parish Human Services Authority	PSH	CoC	196,109	162,926	209,036	196,355	168,967	89,497	1,022,890
	SO	CoC	-	-	-	-	-	24	24
	<b>Provider Total</b>		<b>\$196,109</b>	<b>\$162,926</b>	<b>\$209,036</b>	<b>\$196,355</b>	<b>\$168,967</b>	<b>\$89,521</b>	<b>\$1,022,914</b>
McCaleb Educational Fund	PSH	CoC	\$173,427	\$124,878	\$163,216	\$103,527	\$192,700	\$86,051	\$843,799

Provider Name	Project Type	Primary Funding	CY 19	CY 20	CY 21	CY 22	CY 23	CY 24*	Total
Metro Centers for Community Advocacy	Joint TH-RRH	CoC	-	-	396,298	215,627	431,936	213,681	1,257,543
NAMI New Orleans	PSH	CoC	143,340	170,562	550,296	619,105	590,465	397,688	2,471,456
	SH	CoC	592,307	467,677	301,709	-	-	-	1,361,694
	<b>Provider Total</b>		<b>\$735,647</b>	<b>\$638,240</b>	<b>\$852,006</b>	<b>\$619,105</b>	<b>\$590,465</b>	<b>\$397,688</b>	<b>\$3,833,149</b>
New Orleans Family Justice Center	CE	CoC	\$21,581	\$83,268	\$72,722	\$103,211	\$223,878	\$100,555	\$605,216
	ES	ESG	141,821	131,569	121,471	142,051	3,383,273	9,976	3,930,161
	Joint TH-RRH	CoC	-	103,598	532,624	1,231,169	1,570,350	1,284,194	4,721,936
	RRH	CoC	33,935	907,482	628,816	850,946	675,676	433,804	3,530,659
	<b>Provider Total</b>		<b>\$197,338</b>	<b>\$1,225,917</b>	<b>\$1,355,633</b>	<b>\$2,327,377</b>	<b>\$5,853,178</b>	<b>\$1,828,530</b>	<b>\$12,787,972</b>
New Orleans Women's and Children's Shelter	ES	ESG	\$47,952	\$109,597	\$115,692	\$103,888	\$325,799	\$55,002	\$757,929
	PSH	CoC	1,618	-	-	-	-	-	1,618
	RRH	CoC	286,459	146,654	290,264	227,425	262,315	148,370	1,361,488
	TH	CoC	175,767	159,045	151,192	124,206	127,820	105,744	843,774
	<b>Provider Total</b>		<b>\$511,797</b>	<b>\$415,295</b>	<b>\$557,148</b>	<b>\$455,520</b>	<b>\$715,934</b>	<b>\$309,116</b>	<b>\$2,964,809</b>
NO/AIDS Taskforce	PSH	CoC	\$1,481,693	\$1,384,818	\$1,890,034	\$1,436,024	\$1,999,482	\$774,628	\$8,966,678
Odyssey House	PSH	CoC	762,145	773,202	740,816	708,905	816,484	496,348	4,297,899
Ozanam Inn	CE	CoC	-	-	61,339	38,366	48,450	25,374	173,528
	ES	ESG	144,210	3,107,598	132,294	175,706	149,866	104,307	3,813,980
	PSH	CoC	156,873	578,107	720,665	628,246	695,789	524,312	3,303,991
	RRH	CoC/ESG	-	-	775,706	451,004	524,694	284,657	2,036,060
	<b>Provider Total</b>		<b>\$301,083</b>	<b>\$3,685,705</b>	<b>\$1,690,004</b>	<b>\$1,293,321</b>	<b>\$1,418,799</b>	<b>\$938,649</b>	<b>\$9,327,560</b>
Positive Living	PSH	CoC	-	\$1,453	-	-	-	-	\$1,453
Priority Health Care	RRH	CoC/ESG	-	-	\$380,706	\$260,879	-	\$11,502	653,088
Resources for Human Development	PSH	CoC	\$50,950	36,630	40,660	20,870	\$27,773	23,133	200,017

Provider Name	Project Type	Primary Funding	CY 19	CY 20	CY 21	CY 22	CY 23	CY 24*	Total
Responsibility House	CE	CoC	85,375	66,101	73,279	81,322	84,104	34,940	425,121
	PSH	CoC	1,459,294	1,606,960	1,496,839	1,445,464	1,878,793	1,010,346	8,897,695
	<b>Provider Total</b>		<b>\$1,544,669</b>	<b>\$1,673,061</b>	<b>\$1,570,117</b>	<b>\$1,526,786</b>	<b>\$1,962,897</b>	<b>\$1,045,286</b>	<b>\$9,322,816</b>
Salvation Army	Joint TH-RRH	CoC	-	-	-	-	\$42,252	\$130,116	\$172,368
	RRH	CoC	\$196,650	\$167,149	\$259,609	\$212,147	191,957	-	1,027,512
	TH	CoC	136,859	109,180	135,690	103,759	73,256	-	558,743
	<b>Provider Total</b>		<b>\$333,509</b>	<b>\$276,329</b>	<b>\$395,299</b>	<b>\$315,906</b>	<b>\$307,464</b>	<b>\$130,116</b>	<b>\$1,758,623</b>
Southeast Louisiana Legal Services	SS	ESG	\$39,049	\$61,523	\$655,504	\$2,405,504	\$1,987,772	-	\$5,149,352
St. Vincent De Paul	RRH	CoC	-	-	-	56,840	-	-	56,840
Start Corporation	CE	CoC	-	-	82,588	161,584	155,238	\$73,346	472,756
	ES	ESG	964,745	1,402,595	1,540,575	2,458,839	3,948,303	-	10,315,058
	Joint TH-RRH	CoC	-	-	-	-	101,597	217,084	318,681
	PSH	CoC	2,843,552	2,357,842	2,591,438	2,219,759	2,157,424	1,779,123	13,949,139
	RRH	CoC/ESG	883,906	1,074,721	1,475,222	1,695,363	1,122,409	374,566	6,626,187
	SH	CoC	-	-	23,980	424,860	482,104	247,064	1,178,007
	<b>Provider Total</b>		<b>\$4,692,203</b>	<b>\$4,835,157</b>	<b>\$5,713,803</b>	<b>\$6,960,406</b>	<b>\$7,967,075</b>	<b>\$2,691,183</b>	<b>\$32,859,827</b>
Total Community Action	SS	ESG	\$164,029	\$2,059,658	\$1,064,182	\$216,822	\$283,452	-	\$3,788,143
Travelers Aid Society	CE	CoC	134,715	110,720	142,845	112,631	152,232	\$56,374	709,516
	ES	ESG	109,258	115,708	86,083	86,351	113,979	69,840	581,218
	PSH	CoC	1,039,965	899,603	1,107,165	1,054,773	1,134,813	1,014,197	6,250,515
	RRH	ESG/ERAP	-	-	138,398	164,670	377,631	151,984	832,683
	SO	CoC	-	-	-	-	-	25,068	25,068
	<b>Provider Total</b>		<b>\$1,283,937</b>	<b>\$1,126,031</b>	<b>\$1,474,492</b>	<b>\$1,418,424</b>	<b>\$1,778,654</b>	<b>\$1,317,462</b>	<b>\$8,399,001</b>
Tulane University	CE	CoC	\$127,459	\$84,386	\$64,913	-	-	-	\$276,759
	RRH	CoC	214,546	182,228	15,332	-	-	-	412,107

Provider Name	Project Type	Primary Funding	CY 19	CY 20	CY 21	CY 22	CY 23	CY 24*	Total
	<b>Provider Total</b>		<b>\$342,005</b>	<b>\$266,615</b>	<b>\$80,245</b>	-	-	-	<b>\$688,865</b>
UNITY of Greater New Orleans***	CE	CoC	\$428,779	\$337,883	\$399,073	\$366,299	\$314,491	\$166,118	\$2,012,644
	COVID NCS**	FEMA/ESG	-	2,249,125	2,717,922	677,062	55,215	-	5,699,324
	EHV**	HANO and LHC	-	-	16,030	46,792	18,538	-	81,360
	HMIS	CoC	14,522	14,525	14,524	14,524	14,524	7,262	79,882
	Joint TH-RRH	CoC	-	-	41,704	50,000	115,719	133,443	340,866
	PATH**	SAMHSA	138,730	198,457	187,898	107,233	175,857	77,892	886,067
	Planning	CoC	551,651	303,840	689,957	618,433	827,342	386,102	3,377,325
	PSH	CoC	10,484,060	11,241,583	12,210,404	11,907,558	13,073,232	7,088,260	66,005,096
	RRH	CoC/ESG/ERAP	125,721	358,024	1,364,518	3,855,581	743,122	1,523,622	7,970,588
	SH	CoC	133,642	110,448	86,973	161,470	107,848	37,659	638,040
	SO	CoC	185,611	137,652	239,491	192,559	194,708	41,899	991,921
	TH	CoC	28,915	10,029	11,850	8,103	6,161	2,461	67,518
	<b>Provider Total</b>		<b>\$12,091,633</b>	<b>\$14,961,566</b>	<b>\$17,980,343</b>	<b>\$18,005,614</b>	<b>\$15,646,757</b>	<b>\$9,464,718</b>	<b>\$88,150,631</b>
VIA LINK	HMIS	CoC	\$455,277	\$387,380	\$447,865	\$305,352	\$542,898	\$246,880	\$2,385,652
Volunteers of America	PSH	CoC	113,914	57,672	-	-	-	23,568	195,154
<b>Total</b>			<b>\$27,909,159</b>	<b>\$36,618,482</b>	<b>\$40,930,041</b>	<b>\$41,450,894</b>	<b>\$45,870,378</b>	<b>\$21,876,267</b>	<b>\$214,655,222</b>

\* CY 24 is through June 2024.

\*\* PATH is funded through SAMHSA, EHV through HUD, and COVID Non-Congregate Shelter through a mix of FEMA and ESG funding.

\*\*\* UNITY expenditures include administrative costs.

Source: Prepared by legislative auditor's staff using information from the City and UNITY.



# APPENDIX F: ENCAMPMENT DECOMMISSIONING PROCESSES

Encampment Decommissioning Processes	
Phase	Activities
<b>I. Planning</b>	
<b>Site Assessment (4-6 weeks before closure date)</b>	<ul style="list-style-type: none"> <li>· Complete a visual inventory of encampment site</li> <li>· Review reports of police activity and from homeless service providers</li> <li>· Identify stakeholders (e.g., neighborhood groups, elected officials) in the affected area</li> <li>· Complete site assessment using Encampment Site Planning tool</li> <li>· Brief outreach teams engaging in affected area</li> <li>· Brief City departments participating</li> </ul>
<b>Initial Engagement (4 weeks before closure date)</b>	<ul style="list-style-type: none"> <li>· Initiate engagement with clients*</li> <li>· Collect documents (e.g., identification, proof of income, disability verification, etc.)</li> <li>· Conduct Coordinated Entry Assessments</li> <li>· Brief housing partners</li> <li>· Identify housing units</li> <li>· Update elected officials</li> <li>· Complete by-name list (i.e., the number referred to UNITY for housing for each encampment)</li> </ul>
<b>Encampment Response Intensive Planning (2-3 weeks before closure date)</b>	<ul style="list-style-type: none"> <li>· Continue planning with housing partners</li> <li>· Continue intensive engagement at site</li> <li>· Initiate client housing planning</li> <li>· Inspect and secure housing units</li> </ul>

<b>Encampment Decommissioning Processes</b>	
<b>Phase</b>	<b>Activities</b>
<b>II. Housing</b>	
<b>Encampment Response/Housing Surge (1-2 weeks before closure date)</b>	<ul style="list-style-type: none"> <li>· Continue intensive engagement at site</li> <li>· Complete housing program enrollments and unit applications</li> <li>· Assist with packing and move-ins</li> <li>· Communicate closure schedule with residents, including posting notices seven days, three days, and 24 hours prior closure</li> <li>· Update elected officials</li> </ul>
<b>III. Closure Maintenance</b>	
<b>Site Cleaning (post-closure)**</b>	<ul style="list-style-type: none"> <li>· Clean site following closure, including removing remaining waste and debris, installing new waste receptacles, and treating areas for rodents</li> <li>· Separate remaining personal property for storage</li> <li>· Engage stakeholders to better activate the space following closure (e.g., landscaping or adding lighting)</li> <li>· Install signage</li> <li>· Monitor site to ensure residents have vacated, and route newcomers to housing resources</li> <li>· Law enforcement conducts regular patrols</li> </ul>
<p>* According to the City, housing is not discussed during initial engagement with encampment residents because it may encourage individuals to relocate to the site in order to be housed faster.</p> <p>** Site maintenance involves the participation of OHSS; the New Orleans Department of Sanitation; the Louisiana Department of Transportation and Development, the New Orleans Mosquito, Rodent, and Termite Control Board; NOPD; and other relevant stakeholders, such as development districts.</p> <p><b>Source:</b> Prepared by legislative auditor's staff using information from OHSS.</p>	