

HOMELESS PROGRAMS OPERATIONS AUDIT

NUMBER OF RECOMMENDATIONS



*City of Glendale
Internal Audit*

06.28.2018



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This report is also available online at <http://www.glendaleca.gov>

A. Overview

Key Outcomes

Internal Audit has identified efficiency improvement opportunities of the Homeless Programs Operations based upon a compilation and analysis of staff tasks, time spent to complete each task and the total available staff hours. During the audit, with the assistance of Homeless Programs staff, a task list and estimated hours (“Task + Time”) was compiled. Based upon the “Task +Time” list, Homeless Programs personnel provided tasks that totaled approximately 15,000 annual hours for six staff members (2 salaried, 3 full-time Hourly Workers, and 1 part-time Hourly HMIS Resource Specialist). These tasks were aggregated into 20 categories and efficiency opportunities were identified for five areas including the invoice review and/or drawdown, project management, match requirement, recertification, and annual homeless count.

Based on an analysis of the compiled “Task + Time” list, Internal Audit identified ten initial efficiency improvement opportunities that included streamlining processes, the use of electronic tools, and/or evaluating the cost-benefit of the City providing cash match for City administered programs and a baseline for tasks performed. The continued tracking and modification of this information will enable the unit to identify processes that exceed the expected completion time, staff workload, and future efficiency improvement opportunities.

Impact Dashboard

This table summarizes the applicable value-added categories (total 17) for the 6 recommendations based on their priority rankings and 2 innovation opportunities.

	Value Added Categories				Innovation Opportunities
	Risk Reduction	Compliance	Cost Saving	Efficiency	
Priority 1 2	2	2	1	1	1
Priority 2 3	3	3	2	2	1
Priority 3 1	1	0	0	0	0

(Definitions of Priority Rankings and Value-added impacts are located at Appendix 1)

B. Action Plan and Target Completion Dates

The action plan and target completion dates are summarized in the table below. Internal Audit will perform quarterly status follow-up to provide assurance that management is taking appropriate and timely corrective action to address audit recommendations.

Ref.	Management Action Plan	Completion Date
Priority 1		
1.	Create an automated daily match requirement spreadsheet. <i>Value added:</i> Risk Reduction , Compliance , Cost Saving , Efficiency , Innovation	12/31/18
2.	Record and monitor Homeless Programs systems' user listings and role based access. <i>Value added:</i> Risk Reduction , Compliance	9/30/18
Priority 2		
3.	Evaluate and implement the 10 recommendations detailed in Appendix 2 to improve efficiencies in the five areas identified. <i>Value added:</i> Risk Reduction , Compliance , Cost Saving , Efficiency , Innovation	12/31/18
4.	Update policies and procedures to reflect regulation changes and practices in a timely manner and implement a conflict of interest form. <i>Value added:</i> Risk Reduction , Compliance , Efficiency	12/31/18
5.	Date-stamp invoices upon receipt and periodically review success at achieving the established payment processing timeline goal. <i>Value added:</i> Risk Reduction , Compliance , Cost Saving	12/31/18
Priority 3		
6.	Review changes made within disbursement systems for authorization and input accuracy. <i>Value added:</i> Risk Reduction	3/31/19

C. Background

In accordance with Internal Audit's fiscal year 2017-18 annual work plan, Internal Audit performed an audit of the Homeless Programs Operations.

The Community Services & Parks Department is comprised of five sections (1) Administration, (2) Park Services, (3) Recreation & Community Services, (4) Human Services, and (5) Workforce Development/Glendale Youth Alliance. The Homeless Programs is one of the two sub-sections within the Human Services section. The Homeless Programs Unit administers the following grant and general fund programs:

- **Homeless Continuum of Care Program (CoC)** - U.S. Department of Housing and Urban Development (HUD) funded regional or local planning body that coordinates housing and services funding for homeless families and individuals. It was designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, states, and local governments to quickly rehouse homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless individuals and families; and to optimize self-sufficiency among those experiencing homelessness. HUD identifies four necessary parts of a continuum as (1) Outreach, intake, and assessment in order to identify service and housing needs and provide a link to the appropriate level of both; (2) Emergency shelter to provide an immediate and safe alternative to sleeping on the streets, especially for homeless families with children; (3) Transitional housing with supportive services to allow for the development of skills that will be needed once permanently housed; and (4) Permanent and permanent supportive housing to provide individuals and families with an affordable place to live with services if needed.
- **Emergency Solutions Grant (ESG)** - engage homeless individuals and families living on the street; improve the number and quality of emergency shelters for homeless individuals and families; help operate these shelters; provide essential services to shelter residents, rapidly rehouse homeless individuals and families, and prevent families/individuals from becoming homeless.
- **State Emergency Solutions Grant (State ESG)** - new - The California Department of Housing and Community Development (HCD) administered ESG program with funding received from the HUD. HCD has redesigned how it allocates and distributes funding to align with local systems' federal ESG and Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) goals, invest in impactful activities based on key performance goals and outcomes, improve geographic distribution of funded activities and continuity of funded activities, and create a streamlined delivery mechanism.
- **Measure H** - new - Los Angeles County Homeless Initiative is funded by sales tax revenue for homeless prevention services for individuals, to partner with cities

to expand rapid re-housing, countywide outreach system, strengthen the coordinated entry system, and enhance the emergency shelter system.

- **Landlord Incentive Program (LIP)** - City of Glendale general funded program to encourage landlord acceptance of tenants with a voucher/certificate issued by City of Glendale CoC Homeless Programs.

As noted on the previous page, the Homeless Programs Unit has taken on State ESG and Measure H funding sources. Currently, the State ESG consists of four projects, while the number of projects to be administered with the Measure H funds has yet to be determined. As new funding sources have unique program requirements, they require initial planning and set-up. This includes learning the program requirements, issuing requests for agency proposals, analyzing the proposals received, selecting and recommending the particular agency for Commission and City Council review and approval, establishing new agency agreements templates, providing staff and agency trainings, and submitting required reports. Because these are brand new funding sources, the hours allocated are also based on estimates.

Homeless Programs Overview

The goal of the Homeless Programs Unit is to end and prevent homelessness in the City of Glendale. Homeless Programs receives governmental grant funding from federal, state and local governmental entities. Part of the City of Glendale's responsibility as a recipient of funding from governmental agencies includes oversight, financial, and programmatic management to ensure that the funding is administered in accordance with federal, state and program regulations.

Additionally, the Homeless Programs Unit utilizes the following systems for submitting reports and drawdowns:

- **Homeless Data Exchange (HDX)** - on-line tool designed to allow Homeless CoC to submit data to HUD.
- **Clarity - Homeless Management Information System (HMIS)** - HUD-compliant data collection, sophisticated real-time reporting, and cohesive interagency collaboration throughout the coordinated intake, assessment and referral process.
- **Sage (HMIS)** - Reporting repository for CoC homeless assistance Annual Performance Reports (APRs) and ESG recipient accomplishment data.
- **e-snaps** - contains the application forms that are submitted electronically during the annual competition under the CoC Notice of Funding Availability (NOFA) for Homeless Assistance Programs.
- **eLOCCS** - The Line of Credit Control System (LOCCS) is HUD's primary grant disbursement system, handling disbursements for the majority of HUD programs. Grant disbursements are facilitated via the Internet through the eLOCCS system.
- **Integrated Disbursement and Information System (IDIS)** - As a nationwide database, IDIS provides HUD with current information regarding the program activities underway across the Nation, including funding data. HUD uses this

information to report to Congress and to monitor grantees. IDIS is the draw down and reporting system for ESG.

- **Elite** - A Public Housing Authority payment system to ensure payments are generated to the property owner correctly and on time.

Client Staffing

The City's Homeless Programs Unit is under the supervision of the Director of Community Services & Parks and has a total of six staff positions. These positions consist of a Community Services Manager, a Homeless Programs Coordinator, three full-time Hourly Workers, and one part-time Hourly HMIS Resource Specialist. Currently, a full-time Hourly Worker position that is responsible for Measure H and State ESG funding programs is vacant.

The Homeless Programs Unit has experienced a high turnover rate that has resulted in the continuous need to train new staff. Additionally, the City's Finance Department accounting liaison assigned to Homeless Programs also had a recent change that has resulted in the need to train the new assigned accountant. Lastly, the sub-recipient agencies have also experienced a high turnover rate that has resulted in the need to conduct continuous HMIS and other trainings by Homeless Programs staff.

The City's Homeless Programs Unit is funded by various HUD grants and the City's general fund. However, in addition to the above mentioned directly charged Homeless Programs staff, there are a number of leveraged supports and/or services provided by other City departments and/or community members. These supports and services include, but are not limited to, Finance providing accounts payable, budget, financial monitoring, and drawdown services; the City Attorney's Office providing legal reviews of agreements and assisting with client/landlord disputes; Housing Unit providing the Elite System and Elite technical assistance, and Community Development Block Grant Unit providing for transportation related expenses and ESG related reporting and drawdowns.

D. Objective, Scope and Methodology

The objective of the Homeless Programs Audit was to assess the City's homeless program administration and identify areas where the grants can be administered more efficiently.

The scope of this audit covers homeless program services provided between the period of January 1, 2017 and December 31, 2017.

In order to accomplish the audit objectives, Internal Audit performed the following:

- Interviewed Homeless Programs Unit and other City staff to gain an understanding of the Homeless Programs Operations.
- Interviewed City of Pasadena Homeless Program staff.

- Reviewed available HUD regulations, City of Glendale Policies & Procedures, and Los Angeles HMIS Collaborative Policies & Procedures.
- Compiled a “Task + Time” database consisting of Homeless Programs related tasks and estimated time required for completion. These time estimates were based upon staff’s past experience and were reviewed and adjusted by the Community Services Manager. These time estimates provided useful information to identify efficiency improvement opportunities.
- Conducted analysis on the “Task + Time” database by identifying the time-consuming tasks, grouping them into task categories, evaluating these tasks for efficiency opportunities.
- Compiled a listing of leveraged supports and/or services that included, but were not limited to, the Finance Department, City Attorney’s Office, Housing Division, and Annual Homeless Count volunteers.
- Utilized data analytics software to perform user access control testing on the active eLOCCS, IDIS, and Elite users to identify generic user IDs and/or any employees that have access to the database but are no longer with the City.

E. Summary of Results

Through interviews and walkthroughs with staff to identify the routine tasks, deadlines, and estimated time required to complete each task, Internal Audit has identified 10 efficiency improvement opportunities for five task categories including invoice drawdown, project management, match requirement, recertification, and annual homeless count. These five categories represent close to 40% of the total estimated hours. The efficiency improvement opportunities include the following:

1. Electronic invoice tool for Homeless Programs staff and its sub-recipients.
2. Training videos for routine subjects for benefit of agencies.
3. Electronic client file for more readily accessible client information.
4. “Quick Facts” sheet to summarize key agency contract and/or client information.
5. Electronic match requirement tool to auto-populate required information.
6. Capitalize leveraged services.
7. Elite summary entry sheet.
8. Automate tenant utility update.
9. Utilize electronic tablets for annual homeless count survey.
10. Utilize agency updated HMIS data for sheltered count.

Refer to Observation 3 and Appendix 2 for additional details.

Based upon the audit procedures performed, Internal Audit identified a total of six observations related to match requirement, system user access, timekeeping and staff workload, policies and procedures, invoice processing, and rent increase input accuracy. These observations are detailed in a matrix beginning on page 8.

F. Observations, Recommendations, Management Responses Matrix

Ref	Observation	Recommendation	Management Response
1.	Match Requirement		
Priority 1	<p>Based upon a walk-through and a review of the match requirement process, Internal Audit noted the following:</p> <ul style="list-style-type: none"> a. Due to limited staffing, agencies do not submit their match requirement documents in a timely, orderly or complete manner. b. The spreadsheets utilized by the Homeless Programs staff to accumulate the match requirement documentation do not consistently reference specific service dates. Additionally, the current match requirement hardcopy form provided to agencies does not provide a field to designate the applicable project and requires staff to manually look-up the referenced participant. c. There are leveraged services provided to Homeless Programs that are eligible, but not currently being documented, to satisfy the City's match requirement. This includes approximately 1,210 hours/year of other City staff services provided, including approximately 757 (63%) Finance staff hours and \$4,200 in homeless count volunteer hours and contributed transportation cost. 	<p>Homeless Programs management perform the following:</p> <ul style="list-style-type: none"> a. Enforce the agencies' required monthly match documentation submission and perform timely follow-up. This will reduce the risk of match requirement non-compliance and reduce the required match document review time at the end of the grant period. b. Work with IPA to improve the efficiency of the match process with an electronic tool that includes a project field and references specific dates for the services provided. Including service dates within the electronic spreadsheet will establish a control to prevent duplicate reporting and reduce the time required to review for duplicates. c. Work with IPA to review the leveraged services identified and determine those support and/or services that would be cost-beneficial to utilize as grant required matching funds. 	<p>Agrees and will implement by December 31, 2018.</p> <p>Homeless Programs management will work with IPA to establish a match documentation tool and review the cost-benefit of tracking leveraged services identified for matching requirement purposes. As the Homeless Programs is currently in the process of the 2018 NOFA applications process due to HUD by September 18, 2018, this recommendation cannot be implemented within the Priority 1 three month suggested timeframe, hence the December 31, 2018 implementation date.</p>

Ref	Observation	Recommendation	Management Response
2. System User Access			
Priority 1	<p>Based upon discussions with staff regarding Homeless Programs related systems and detailed testwork performed on the three disbursement systems, we noted the following:</p> <ul style="list-style-type: none"> a. Shared logon credentials for the eLOCCs, SAGE, and/or eSNAPS systems. b. Generic user IDs for the Elite disbursement system. c. User access lists are not readily available or regularly requested or reviewed for HUD provided systems and/or Clarity HMIS. Two employees that separated their employment from the City in late 2017 had active access to the grant drawdown system as of February 22, 2018. d. There is no back-up administrator access established for the IDIS reporting and drawdown system, eLOCCs, and/or eSNAPS systems. 	<p>Homeless Programs management perform the following to improve access control:</p> <ul style="list-style-type: none"> a. Discontinue the practice of sharing logon credentials and change all shared passwords. b. Eliminate the use of generic User IDs and/or passwords for the Elite disbursement system and appropriately limit staff access to sensitive data. c. Establish a procedure to track and record all system access requests, track the level of access granted to each user, deactivate users upon termination, and periodically obtain and review the user listing for employees who have either separated or no longer have responsibilities that require access to the system. d. Establish a procedure to ensure that there is a back-up administrator for all Homeless Programs related systems, especially for the drawdown systems. 	<p>Agrees and will implement by September 30, 2018.</p> <p>Items a-c have been completed.</p> <p>Item d: A designee will be established by September 30, 2018.</p>

Ref	Observation	Recommendation	Management Response
3. Task Analysis			
Priority 2	<p>In order to assist in identifying tasks where efficiency can be improved, Internal Audit compiled a “Task + Time” database. This was conducted at the request of the Director of Community Services & Parks and based upon Homeless Programs staff estimates that were reviewed and adjusted by the Community Services Manager.</p> <p>Based upon a review of the “Task + Time” data compiled, Internal Audit identified efficiency opportunities related to the five task categories of (1) project management, (2) invoices and drawdowns, (3) match requirement, (4) recertification, and (5) annual homeless count. These five task categories represent close to 40% of the total task hours identified.</p>	<p>Homeless Programs management evaluate and implement the 10 recommendations detailed in Appendix 2 to improve efficiencies in the five areas identified.</p> <p>Additionally, Homeless Programs management perform the following:</p> <ol style="list-style-type: none"> a. Develop and require staff to maintain a timesheet by projects and tasks. This timesheet should track grant projects, pre-defined major task categories, and the related hours spent for each day of the reporting period. b. Provide each staff member with a task list and expected completion times. c. Review staff's success at reaching the task expected timelines, identify the most time-consuming tasks, identify efficiency and/or staff development opportunities, and evaluate overall staff workload. d. Work with IPA to analyze the cost-benefit of each grant, including available grant funds, required staff resources, and the program outcomes by grant. 	<p>Agrees and will implement by December 31, 2018.</p> <p>Management has implemented the recommendation to automatically populate the CoC annual tenant utility allowance updates within the Elite System.</p> <p>Management will evaluate the feasibility of implementing the recommended efficiency improvement opportunities. Some of these items, such as evaluating workload and data security, will require coordination with IPA, Information Services Department, City Attorney’s Office, and agencies.</p>

Ref	Observation	Recommendation	Management Response
4. Policies and Procedures			
Priority 2	<p>Based upon staff interviews and a review of the HUD monitoring report, Internal Audit noted that staff corrected a HUD identified deficiency related to lack of updated policies and procedures to reflect updated regulations; however, no controls were established to reduce the reoccurrence risk.</p> <p>Additionally, based upon staff interviews, Internal Audit noted the following:</p> <ul style="list-style-type: none"> • Unlike Community Development Department’s Housing Division, the Homeless Programs Unit does not currently require its staff to complete a conflict of interest form upon being hired. • All disputed rent increases do not follow the same appeals process. 	<p>Homeless Programs management perform the following:</p> <ul style="list-style-type: none"> • Establish a process to track and update applicable policies and procedures to incorporate new/revised regulations on a periodic basis (quarterly or annually). • Obtain Community Development Department’s Housing Division’s conflict of interest form, make any necessary revisions, and have staff complete the form upon being hired and at the end of each fiscal year. • Consistently apply the documented rent increase appeals process or make any additional appeals options available to all tenants/landlords. 	<p>Agrees and will implement by December 31, 2018.</p>

Ref	Observation	Recommendation	Management Response
5. Agency Reimbursement Invoices			
Priority 2	<p>In order to meet the agency agreement’s net 30 day payment terms, it has been the Homeless Programs goal to review, approve, and forward agency reimbursement invoices to Community Services & Parks Administration for approval within seven days of receipt.</p> <p>However, based upon a review of sampled invoices, most were not date-stamped and as a result Internal Audit could not determine whether they were processed within the required timeframe. Internal Audit also noted that one was not processed within seven days of last invoice receipt date and one was not paid within 30 days of original receipt date and/or original invoice date.</p>	<p>Homeless Programs management establish and document an invoice processing procedure that:</p> <ol style="list-style-type: none"> a. Requires all invoices be date-stamped upon receipt. b. Specifies the invoicing processing timeframe and monitors its success at meeting its goal. 	<p>Agrees and will implement by December 31, 2018.</p> <ol style="list-style-type: none"> a. All invoices will be date-stamped upon receipt. b. Due to staffing limitations, Homeless Programs management will revise its agency contract and practice of reviewing and processing agency invoices for payment within seven calendar days to net 60 days to be consistent with LAHSA.
6. Rent Recalculation Input Accuracy			
Priority 3	<p>There is no review process in place to ensure the accuracy of the components, such as income and utility allowance, entered into the Elite System for the rent calculation/re-calculation.</p>	<p>Homeless Programs management establish a periodic sample review process, similar to Housing Division, to reduce the risk of undetected rent calculations/re-calculations errors within the Elite disbursement system.</p>	<p>Agrees and will implement by March 31, 2019.</p> <p>Effective July 1, 2018 – Elite responsibilities will be delegated to staff and the risk assessment/monitoring will be performed by the Community Services Manager.</p>

Appendix 1: Definitions of Priority Rankings and Value-Added Categories

Definitions of Priority Rankings

The priority rankings are assigned by the internal auditors based on their professional judgment. They are also agreed to by management based on their evaluation of the alignment with the strategic goals, priorities and available resources. A timeline has been established based on each priority ranking:

- a. **PRIORITY 1** - Critical control weakness that exposes the City to a high degree of combined risks. Priority 1 recommendations should be implemented within **3 months** from the first day of the month following report issuance or sooner if so directed.
- b. **PRIORITY 2** - Less than critical control weakness that exposes the City to a moderate degree of combined risks. Priority 2 recommendations should be implemented within **6 months** from the first day of the month following the report issuance or sooner if so directed.
- c. **PRIORITY 3** - Opportunity for good or better practice for improved efficiency or reduce exposure to combined risks. Priority 3 recommendations should be implemented within **9 months** from the first day of the month following the report issuance or sooner if so directed.

Definitions of Value-Added Categories

The four value-added impact categories are defined based on their impact from the audit recommendations:

- a. **COMPLIANCE** - adherence to laws, regulations, policies, procedures, contracts, or other requirements.
- b. **COST SAVING** - lower the costs related to conducting City businesses
- c. **EFFICIENCY** - ability to avoid wasting resources (money or time) in achieving goals
- d. **RISK REDUCTION** - lower the risks related to strategic, financial, operations and compliance

In addition, the **INNOVATION OPPORTUNITY** tag indicates the assistance and consulting services that may be provided by the Innovation and Performance Team.

Appendix 2: Efficiency Opportunities

The table below provides a summary of the recommendations for efficiency improvements as a result of reviewing the “Task + Time” database from Observation 3. Internal Audit reviewed these task categories and identified ten efficiency opportunities within the following five categories:

	Task Category	Efficiency Opportunity Recommendations
1.	Invoices and Drawdowns	Create and implement an electronic invoice tool for Homeless Programs staff and its sub-recipients. This tool should round all calculations to decimal points, be locked to prevent numerous manual adjustments, and include a column to include any reconciling rounding amounts between the invoice and supporting general ledger reports.
2.	Project Management	<p>Create training videos to cover the routine subjects such as match requirement documentation and address the high employee turnover rates at the various agencies.</p> <p>Determine the feasibility of establishing electronic client files through the use of software such as Microsoft OneNote to store pertinent Homeless Programs documents. Electronic files will serve the purpose of providing storage and back-up for hardcopy files and decrease the risk that client related information is misplaced or lost in a catastrophic event such as a fire. Additionally, electronic files enable staff to more efficiently access and/or search for project or client information.</p> <p>Establish a “Quick Facts” sheet for each project and/or client. This “Quick Facts” sheet should provide the reader with a high level summary of the agency contract and/or client file and include pertinent information such as income, family composition, lease dates, inspection dates, and recertification dates. Establishment of a “Quick Facts” sheet for each grant award or sub-recipient agreement decreases the risk that agreement requirements or deadlines are missed and/or potential disruption of operations in the event of staff turnover.</p>

	Task Category	Efficiency Opportunity Recommendations
3.	Match Requirement	<p>Create and implement an electronic match requirement tool for Homeless Programs staff and its sub-recipient agencies. This tool will reduce the time necessary for the agencies to complete manual forms and for City staff to manually input the match documentation into a spreadsheet to accumulate the match requirement dollars received by clients, check for duplicates, and identify missing supporting documentation. This tool could include drop-down menus for applicable program, client name, and service provider and be formulated to auto-populate hourly rates, total match value per day and for the service date range, and the ability to print match requirement forms to be signed by the service provider.</p> <p>Capitalize on the City’s staff and volunteers leveraged services to meet the grant match fund requirements. This will require time tracking by other City staff and volunteers. This can be done by sharing the time reporting spreadsheet used by Homeless Programs staff with other City staff and have all volunteers log any volunteer hours.</p>
4.	Recertification	<p>Summarize the data required to complete the recertification process within the Elite System onto a single sheet to be used to enter the information into the Elite System. This will streamline the recertification data entry process by eliminating the need to search the file for required information.</p> <p>Utilize the Elite system to automatically populate the CoC annual tenant utility allowance updates uploaded by Housing Division staff and document the process to ensure that this process is consistently performed. Implementing this process will increase efficiency and eliminate the risk of input errors. (Implemented)</p>
5.	Annual Homeless Count	<p>Determine the feasibility of utilizing electronic tablets to directly enter Annual Homeless Count survey information and streamline the data collection and data entry process.</p> <p>Require agencies to review and update their HMIS data, add any new survey questions, and report the sheltered count based upon a HMIS report. This will eliminate the need for City staff to reconcile the sheltered count with the HMIS data.</p>