



Audit of Homelessness Response

Some laws implemented for public health and safety purposes impact people experiencing homelessness. Encampment response processes are reactive, not coordinated, and not well documented. While some individuals are connected to mental health services, the City's mobile crisis response function has not been efficient or well-defined.

Street outreach activities are not coordinated. While the Street Outreach Contractor generally meets housing outcome goals, the Homeless Outreach Team does not effectively connect people experiencing homelessness with housing solutions due to a lack of dedicated resources. The Community Shelter Contractor has generally not adopted housing-first practices as required by contract and has created a punitive punishment system that likely bars more people than necessary from assistance.

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Audit at a Glance

Why we did this Audit:

The City currently funds street outreach activities and an emergency shelter to assist people experiencing homelessness. Still, nearly nine out of ten residents viewed homelessness in Denton as a major or moderate problem facing the community in 2024. This audit project was included on the City's fiscal year 2024-25 Audit Plan as approved by the City Council.

What we Recommend:

Recommendations 1, 2, 5, & 10

Increase coordination between street outreach providers and centralize encampment decision making.

Recommendations 3, 4, 11, & 14

Consider providing additional support to assist people experiencing homelessness.

Recommendations 9, 13, 17

Improve data on street outreach and emergency shelter outcomes.

Recommendations 6, 7, 8, 12

Explore options to more effectively allocate street outreach and crisis response team resources.

Recommendations 15, 16, 18, & 19

Align Community Shelter operations with housing-first and low-barrier best practices per contract.

What we Found:

As housing instability has increased, communities have begun assisting people experiencing homelessness by supporting them, financially and logistically, to access more stable housing. This audit generally evaluated the effectiveness of homelessness assistance programs and enforcement activity compliance with relevant laws and alignment with Federal guidance. Our findings are summarized below:

Enforcement, Encampments, and Mental Health

Response. Some state and local laws impact people experiencing homelessness. Still, the City provides resources for individuals experiencing homelessness who have been cited and arrested.

Encampment response processes are reactive, not coordinated, and not well documented. No guidelines exist for private property encampments.

The City has created a mobile crisis response function; however, its purpose, procedures, and goals were not well defined. Still, some individuals are connected to mental health services.

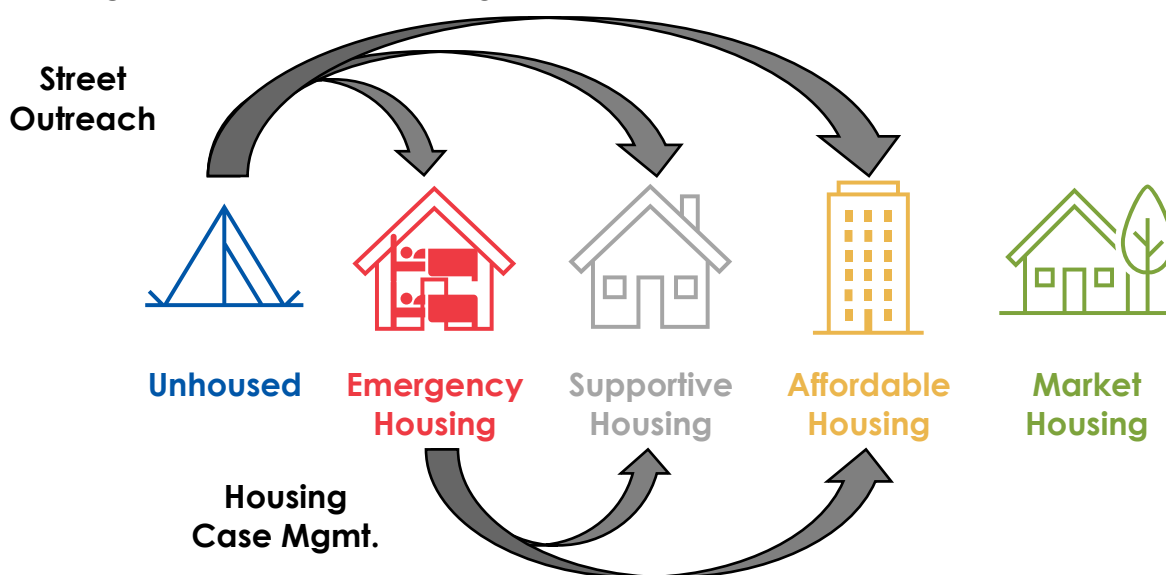
Street Outreach Activities. Historically, City-funded street outreach efforts have not been coordinated. The Street Outreach Contractor is generally meeting housing outcome goals. The Homeless Outreach Team does not connect people experiencing homelessness with housing solutions because police officers lack dedicated resources and are not well-positioned to perform street outreach.

Community Shelter Operations. The City's Community Shelter contract aligns with best practices; however, the Community Shelter Contractor has generally not adopted housing-first practices. While some low-barrier practices are adopted, rules are extensive and not always clear. The punishment system is punitive and likely bars more people than necessary from access. The City has not historically requested feedback from Community Shelter guests.

Detailed Findings & Analysis

According to the U.S. Interagency Council on Homelessness, safe, stable, and affordable housing promotes the long-term well-being and quality of life of a community's residents and helps to reduce demand for emergency intervention services, decreasing costs long-term. In general, there is a spectrum of housing stability with people experiencing homelessness experiencing the most instability as illustrated in Figure 1.

Figure 1: Simplified Housing Stability Spectrum & Assistance Services



People experiencing homelessness often live in places not meant for habitation such as vehicles, abandoned buildings, or other outside locations. These individuals experience increased health and safety risks that impact the community's quality of life. To address this impact, communities have begun assisting people experiencing homelessness by supporting them, financially and logistically, to access these more stable housing solutions.

In addition, many people experiencing homelessness report having a chronic health condition, mental illness, physical disability, or substance use disorder, which are often exacerbated by housing instability. These health issues, as well as living in public spaces, increase the likelihood that people experiencing homelessness will be engaged by law enforcement officers.

While housing instability has always been an issue in communities, economic factors exacerbated during the early years of the COVID-19 Pandemic have substantially increased the number of people experiencing homelessness from about 235 people county-wide in 2018-2020 to about 465 in 2022-2024—almost a

100 percent growth. For comparison, the average county population increased by about 14 percent or those periods. During that same period, the number of people experiencing homelessness in the United States increased by almost 20 percent.

In 2024, United Way of Denton County reported there were 424 people experiencing homelessness in the City of Denton based on the Point-in-Time Count, an annual survey of people experiencing homelessness that occurs in January. The City of Denton's 2024 Community Survey found that "nearly nine out of ten residents view homelessness in Denton as a major or moderate problem facing the community." In addition, over half of these survey respondents deemed providing shelter during harsh weather and funding mental health programs for people experiencing homelessness essential. This survey information is summarized in Image 1 below.

Image 1: 2024 Resident Priorities for Homelessness Response Program Funding

21. How important to you, if at all, is it for the City of Denton to contribute funding to community-based organizations that provide each of the following services to the homeless population and others in need?				
	Essential	Very Important	Somewhat Important	Not at all Important
Job training programs	33%	41%	19%	7%
Mental health programs	50%	32%	15%	4%
Substance abuse programs	47%	35%	13%	5%
Shelter during severe weather, including temperature extremes	54%	29%	13%	4%
Housing and rental assistance programs	34%	31%	26%	10%
Supportive housing, which combines housing with services such as job training and substance abuse treatment	38%	36%	18%	7%

In Denton County, access to supportive housing and affordable housing is tied to the housing priority list. To be placed on the housing priority list, a person must complete a coordinated entry assessment with a trained assistance provider that has access to the Homeless Management Information System. This assessment determines what available programs a person is eligible for and prioritizes them based on a vulnerability score. Households who do not have contact with an assistance provider for 90 days or receive some type of housing—even if it is in a treatment or detention facility—are considered inactive and essentially moved to the bottom of the housing priority list. This housing prioritization and placement process was not evaluated as part of the audit but is essential to understanding how people exit homelessness.

This audit generally evaluated the effectiveness of homelessness assistance programs and enforcement activity compliance with relevant laws and alignment with Federal guidance.

Some Laws Impact People Experiencing Homelessness; Encampment Response Should be Further Coordinated for Efficiency

Based on the 2024 Denton County Point-in-Time Count, about 45 percent of people experiencing homelessness live unsheltered meaning they reside in a place not meant for habitation. These individuals often congregate in outdoor encampments for community and an increased sense of security. These encampments often include items designed to protect a person from weather conditions such as tents, sleeping bags, or bedrolls, as well as other personal belongings.

However, the U.S. Interagency Council on Homelessness suggests encampments may be in places that are not safe, such as in medians or near highways, or in spaces that have been identified as hazardous waste sites. For these reasons, that organization recommends a community use the following principles when addressing encampments:

Figure 2: Principles of Encampment Response

1. Establish a Cross-Agency, Multi-Sector Response to Encampments

- Use a "command center" approach to coordinate encampment planning and response.
- While law enforcement may need to be involved, they should not drive the process.

2. Engage Encampment Residents to Develop Solutions

- Provide ample, visible public notice when an encampment is going to be closed.
- Only close encampments after outreach teams have had time to engage with residents to find alternative shelter, housing, and service options.

3. Conduct Comprehensive and Coordinated Outreach

- Addressed in other sections; see page 18.

4. Address Basic Needs and Provide Storage

- Take care to avoid destroying personal belongings when closing encampments and provide storage for an adequate period to allow people the opportunity to collect their belongings.

5. Ensure Access to Shelter or Housing Options

- Do not close an encampment unless there is access to low-barrier shelter or housing.

6. Develop Pathways to Permanent Housing

- Addressed in other sections; see page 23.

7. Create a Plan for What Will Happen to Encampment Sites After Closure

- Secure locations with previous encampments that are not safe to ensure encampments don't return.

In 2021, the State of Texas passed a law banning camping in a public place without the consent of the agency charged with managing that location. An agency's consent to camping for the purpose of housing people experiencing

homelessness is ineffective unless it is given pursuant to a plan approved by the Texas Department of Housing and Community Affairs.

In addition, the U.S. Department of Housing and Urban Development has recognized that some municipalities have implemented laws for public health and safety reasons that may impact people experiencing homelessness.¹ Specifically, the National Homelessness Law Center, an organization recognized by the U.S. Department of Housing and Urban Development as a resource on this issue, has identified seven behaviors common for unhoused individuals that may be locally banned:

- Camping in public
- Sitting and lying down in public
- Panhandling, or begging
- Sleeping in public
- Loitering, loafing, or vagrancy
- Living in vehicles
- Sharing food

What We Found

- The City of Denton has generally not enacted local laws that may impact people experiencing homelessness but does enforce State laws that ban camping in public places and soliciting in roadways.
 - The City has not adopted laws that ban sleeping in public; sitting or lying down in public; loitering, loafing, or vagrancy; or sharing food. Three local laws have been adopted banning at least one of the seven common unhoused behaviors as outlined in Table 1.

Table 1: Local Laws that May Impact People Experiencing Homelessness²

Code of Ordinances	Description
Sec. 22-31	Camping in a public park unpermitted
Sec. 25-5	Using a thoroughfare (i.e., street, shoulder, or median) for soliciting without a permit.
Sec. 17-101	Using a vehicle for living or sleeping

Texas Penal Code § 48.05 interacts with the City's local law against camping in a public park but these laws do not conflict. The City's local law against solicitation in thoroughfares appears to be a more expansive version of Texas Transportation Code § 552.007, which bans solicitation in just roadways. These laws are intended to prevent public health and safety issues such as attracting wildlife and creating

¹ The US Department of Housing and Urban Development's statements on this issue can be reviewed here: <https://www.hudexchange.info/homelessness-assistance/alternatives-to-criminalizing-homelessness/>

² Sec. 21-6 of the Code of Ordinances bans aggressive solicitation; however, based on a comparison of this law with The National Homelessness Law Center's description of laws prohibiting panhandling, this law does appear to be aimed at aggressive behaviors.

hazardous waste, as well as decreasing the risk of motor vehicle accidents.

- Most of the City's enforcement actions for these laws have been based on State law as shown in Table 2. These types of citations make up about one percent of all citations transmitted to the Denton Municipal Court.

Table 2: Summary of Enforcement Actions per Laws that May Impact People Experiencing Homelessness

Law	FY23 Violations	FY24 Violation	Issued to People at Transient Addresses
Penal Code § 48.05: Camping in Public Places	151	102	82%
Sec. 22-31: Camping in Parks	8	4	83%
Transportation Code § 552.007: Soliciting in Roadways	29	9	76%
Sec. 25-5: Soliciting in Thoroughfares	62	12	68%
Sec. 17-101: Living in Vehicles	0	0	NA

- These 377 citations were issued to 228 unique individuals; 72 percent of these individuals were experiencing homelessness based on the address information recorded on their citation. Further, about 30 percent of these individuals were cited more than once for one of these laws during Fiscal Years 2023 and 2024.
- Most of these citations are resolved through time served as outlined in Table 3. Only about three percent of the \$137,062 in fines assessed for these citations was collected.

Table 3: FY23 and FY24 Case Resolutions for Enforcement Actions per Laws that May Impact People Experiencing Homelessness

Resolution	Violations	Payments
Fine Paid	17	\$4,358
Closed	227	\$0
Dismissed by Prosecutor	21	\$0
Dismissed after Deferral	7	\$510
All Resolved:	272	\$4,868

- It should be noted that people experiencing homelessness may be charged with per State Penal Code with criminal trespass if they are on private or public property. Criminal trespass is a Class B misdemeanor meaning charges are resolved in county court instead of the Municipal Court. Criminal trespass calls for response made up about three percent of the Police Department's 116,726 calls for response during Fiscal Year 2024 and 387 of these calls resulted in an arrest.

- The City provides resources for individuals experiencing homelessness who have been cited and arrested.
 - Based on discussion with City jail staff, as part of the booking process individuals are asked questions to determine if they are experiencing homelessness. If a person is experiencing homelessness, jail staff may contact a clinician employed by the City to discuss resources and options with the individual. In addition, staff may offer to launder an individual's clothing or provide new clothing if needed.
 - Staff indicated that there is signage visible to individuals in jail cells that provide phone numbers and information about substance use and potential employment options.
 - In addition, the Municipal Judge has worked with the Community Shelter Contractor to create a legal advocacy program whereby people experiencing homelessness can complete steps towards obtaining more stable housing to defer the disposition of low-level citations. As of January 2025, 18 people have completed this program and 11 people are in the process of completing the program.
- Historically, the encampment response process has been triggered by resident reports regarding these seven behaviors common for people experiencing homelessness.
 - Specifically, 73 percent of resident reports that were tracked as part of the encampment response process were based on one of the seven behaviors common for people experiencing homelessness as outlined in Table 4.

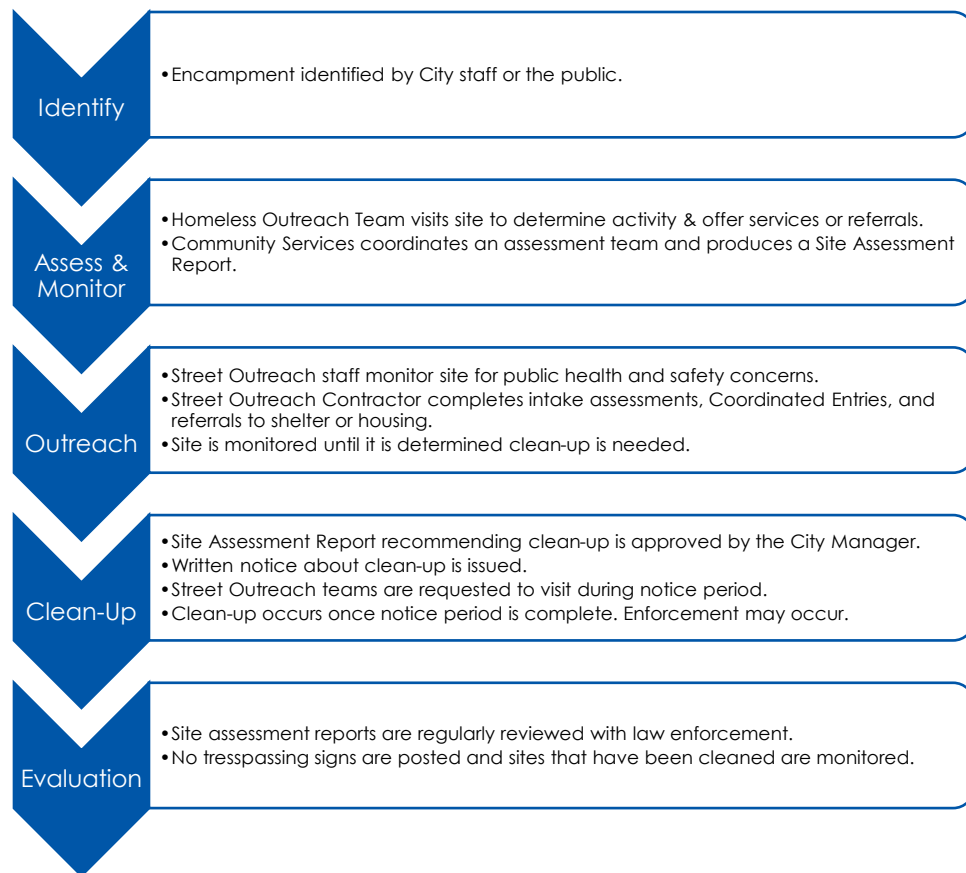
Table 4: Resident Encampment Reports by Behavior

Behavior	Reports	Percent
Camping in Public	123	33%
Loitering, Loafing, Vagrancy	70	19%
Sleeping in Public	46	12%
Living in Vehicles	17	5%
Sitting or lying Down	10	3%
Solicitation	5	1%
Sharing Food	0	0%
Other ³	101	27%

³ This category includes reports that did not have a clear description (ten percent), reports of trash and debris (13 percent), and other behaviors such as staying in a vacant building (five percent).

- Current encampment response processes are driven by Homeless Outreach Team officers and are reactive instead of using a strategic, “command center” approach.
 - The City has established written guidelines for responding to encampments on public property as illustrated in Figure 3. Under the Guidelines an “encampment” is a place where people are living unsheltered and is “active” if there are “items and/or persons present.”

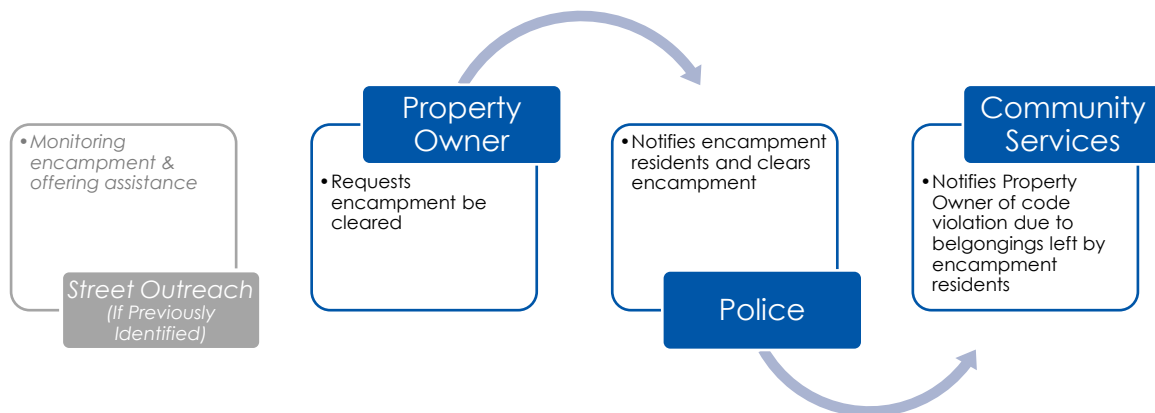
Figure 3: City Property Encampment Response Process



- Encampment assessments are primarily driven by officers on the Homeless Outreach Team, which may not be an efficient use of resources. Specifically, about 20 percent of Fiscal Year 2024 resident reports that had follow-up notes indicated that neither an encampment nor a person experiencing homelessness were located after officers were dispatched.
- No formal Site Assessment Reports appear to have been created as specified by the Guidelines. Instead, all relevant site data is collected in the Encampment Tracking Spreadsheet which is primarily intended to track resident reports. This spreadsheet does not generally include information identified by the Guidelines as needed including site

- conditions, outreach efforts, public safety data, public health data, and resident concerns.
- Active and inactive large encampment locations and locations of interest are not centrally tracked or formally monitored. Instead, encampment efforts have historically been focused on responding to resident reports using the Encampment Tracking Spreadsheet. Further, this tracking method is not clearly effective as over half of received resident requests did not have documented follow-up notes.
 - While both City and contracted street outreach staff regularly visit some large encampments and locations of interest, this information is not clearly used to inform encampment and closure decisions. At least 44 resident encampment reports (about a quarter of those with documented follow-up) were for known encampments or other locations of interest.
 - Written guidelines for responding to encampments located on private property have not been established and practices may disincentivize property owners from reporting encampments. The private property encampment response process is generally outlined in Figure 4.

Figure 4: Private Property Encampment Response Process



- Most active large encampments appear to be located on private property; however, there is currently no process or guidelines on when to notify a property owner or document and monitor private property encampment site conditions.
- To clear an encampment on private property, a property owner must request a response or provide an Enforcement Authorization if the property owner is not present. Once this occurs law enforcement may clear the encampment. The City is not required to provide notice to encampment residents on private property and there are no

- guidelines on providing notice or informing street outreach staff before an encampment is cleared.
- Once a private property encampment is cleared, Code Enforcement Division staff generally notify the property owner that they are violating the City's Code of Ordinances due to personal belongings left on the property by encampment residents. While staff reported that Code Enforcement officers are flexible with property owners around remediation timeliness, resources are generally not provided to the property owner to assist with cleanup.
 - Encampment clean-up decisions are not well documented and clean-up practices increase the risk of people's belongings being destroyed.
 - Encampment cleaning and closure decisions are not formally documented or approved as specified by the Guidelines. The time between any encampment being identified, closed, and cleaned is not formally tracked by Community Services despite City staff involvement in all processes.
 - According to staff, the definition of an active or abandoned encampment is unclear. This distinction is critical because abandoned sites do not require notice before cleaning based on the Guidelines.
 - Historically, encampment closure notices have only been posted in English increasing the risk that individuals who do not read English do not receive notice.
 - The City does not currently provide storage options to individuals who live in an encampment scheduled for cleaning. According to staff, any items left at an encampment after the notice period expires is considered trash and destroyed.
 - Costs for cleaning large encampments on City property are tracked, but similar information is not available for small encampments on City property or any encampments on private property.
 - The City has executed a contract for abatement services, which is primarily used for mowing areas managed by the Parks and Recreation Department. In addition, it is used for abating private property code violations identified by Code Enforcement Officers and large encampment cleanups on City property. Small encampments on City property are generally cleaned by Parks & Recreation Department staff as part of their regular job duties; however, there are no written guidelines on determining when an encampment should be cleaned by the contractor or City staff.

- Just over \$50,000 was spent during Fiscal Year 2024 to clean large City property encampments, but costs to clean small encampments, are not being clearly tracked.

Why It Matters

People experiencing homelessness are often the most vulnerable members of a community due to financial insecurity and health issues. Some State and local laws implemented to promote public health and safety disproportionately impact people experiencing homelessness. Still, the City has created processes and resources that help people experiencing homelessness who have been cited and arrested connect with assistance, which may help reduce costs to the community overall.

Encampments provide community to people experiencing homelessness and support street outreach work by making it easier to regularly interact with clients seeking support and assistance towards housing stability. Still, encampments may be in unsafe locations or create hazardous conditions. For these reasons, consistent and concise monitoring of encampments is critical to ensuring that residents remain as protected as possible and decision makers are informed about actual conditions.

While the City has created guidelines to guide responses to encampments on City property, these are not clearly followed, hindering strategic decision making. Although most encampments are located on private property, there are no written procedures for responding to and consistently monitoring encampments on private property. This creates uncertainty for encampment residents, street outreach staff, and property owners. Having clear notice guidelines, ample time for outreach work to occur, and respect for encampment residents will help to ensure create a more efficient and effective process.

Recommendations:

1. Centrally track all large encampment locations and regularly monitor encampment sites to help inform closure and cleaning decisions. Encampment monitoring should include information on active and closed site locations, active site conditions including health and safety concerns, and location-based engagement data (i.e., outreach contacts, public safety calls, and resident reports). Data related to encampment identification, closure, and cleaning timeliness and costs should be retained for large encampments on City and private property to the extent possible.

Community Services Comments: *Community Services staff will continue to develop the encampment tracking tools to ensure engagement data and*

data around costs and services are retained. Time will be required to fully standardize practices across internal and external partners.

2. Update the Encampment Response Guidelines to align with current practices. Consider aligning the definition of active encampments to the definition of “shelter” in the Texas Penal Code to aid decision-making.

Community Services Comments: *Staff will update the Encampment Response Guidelines to align with current practices and any Council direction.*

3. Provide notice of encampment closures, at least, in English and Spanish.

Community Services Comments: *Community Services is actively working to improve encampment closure processes, including providing notices in English and in Spanish.*

4. Explore options for providing temporary storage to people experiencing homelessness. Storage may be offered if an encampment will be cleaned or if individuals wish to access shelter services.

Community Services Comments: *There are not currently resources available to store items from encampment cleanup.*

5. Develop a systematic process to assess and monitor encampments on private property to minimize health and safety risks. This process should balance the rights of property owners with the needs of people experiencing homelessness. To the extent possible, private property encampments should not be closed until notice is provided and outreach staff can connect with encampment residents. Clear guidelines for assessing site conditions should be established to determine when property owners should be notified about encampments so health and safety issues can be addressed timely.

Community Services Comments: *Community Services staff will seek to create a process that mirrors our city property process, focused on technical assistance and education for property owners and connecting the unhoused with resources.*

The City’s Mobile Crisis Response Team does not Clearly Divert People Experiencing Mental Health Crises to Licensed Clinical Staff

Based on the 2024 Denton County Point-in-Time count, at least a third of people experiencing homelessness self-reported having a serious mental illness and 15 percent self-reported having a substance use disorder. These health issues generally hinder a person experiencing homelessness’s ability to access more

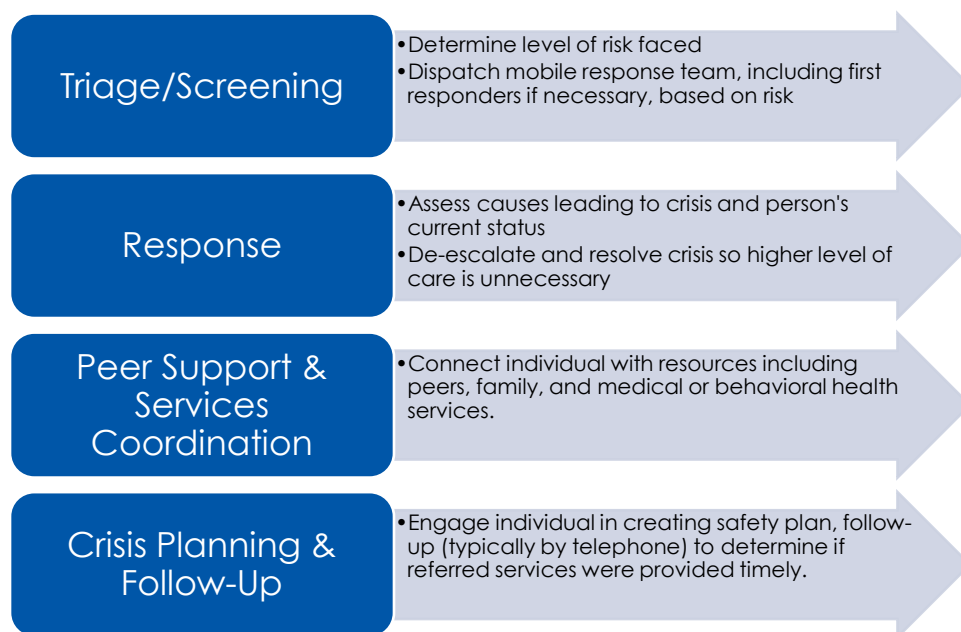
stable housing and increase their likelihood of experiencing negative enforcement actions.

The Substance Abuse and Mental Health Services Administration recommends that a community establish a crisis care system that includes a mobile crisis team to decrease the likelihood of these negative interactions.⁴ A mobile crisis team is intended to provide community-based intervention to individuals in need wherever they are. A mobile crisis team should respond without law enforcement accompaniment unless special circumstances warrant inclusion to support true justice system diversion and, at minimum, should:

- Include a licensed or credentialed clinician capable of assessing the needs of individuals;
- Respond where the person is and not restrict services to select locations or particular times or days; and
- Connect individuals to facility-based care as needed through warm hand-offs and coordinating transportation when and only if situations warrant transition to other locations.

Figure 5 outlines the ideal mobile crisis response process:

Figure 5: Mobile Crisis Response Process



⁴ Other elements of a crisis care system include: a regional crisis call center that offers real-time access to a live person 24/7/365 and meets the National Suicide Prevention Lifeline operational guidelines; and crisis receiving and stabilization facility that offer no-wrong-door access to mental health and substance use cases.

What We Found

- The City has created a mobile crisis response function; however, it's purpose, procedures, and goals are not well defined.
 - The City has created a Critical Incident Response Team, or CIRT, to provide mobile crisis response services to Denton residents. Historically, this team includes three licensed clinicians each paired with a police officer historically. Policies and procedures to guide the City's mobile crisis team program had not been developed and outcomes were not regularly reported.
- Most mental health calls for response are not responded to by CIRT and all reviewed calls for response include at least one law enforcement officer. Still, some individuals are effectively connected to mental health services.
 - Only about 16 percent of mental health calls for response were completely diverted to CIRT and no calls for response were only responded to by a clinician based on a review of a sample of calls for service as shown in Table 5.
 - Law enforcement officers are currently partially functioning as crisis call center resources. In particular, about 16 percent of mental health calls for response were resolved over the phone by regular law enforcement officers.
 - About 25 percent of mental health calls for response resulted in a voluntary transport to a health service center and about eight percent resulted in an enforcement action (i.e., emergency detention order, trespass, or arrest).

Table 5: Summary of Mental Health Calls for Response by Service & Unit Type⁵

Service	Officers Only	Officers & CIRT	CIRT Only	Percent by Service:
Enforcement	2	1	2	8.2%
Transport	10	5	0	24.6%
In-Person Contact	14	1	6	34.4%
Virtual Contact	9	1	2	19.7%
Other	8	0	0	13.1%
Percent by Unit:	70.5%	13.1%	16.4%	

⁵ Some patrol officers are CIRT-trained but are not in the CIRT unit. It is possible that these officers responded to Mental Health calls for service more, however, this was not made clear during the sample review.

- Written guidelines for Public Safety Communications staff for assessing mental health call risk level to determine what type of units should be dispatched to a mental health call have not been developed. According to Police Department staff, the City's dispatch system was historically set up to automatically dispatch only patrol officers to mental health calls for response because there were more calls than could be handled by CIRT and CIRT only worked during regular business hours.
- In December 2024, CIRT was combined with the Homeless Outreach Team to allow for officers within this unit to respond to calls without being accompanied by a clinician, increasing the unit's response coverage. Under this new model, CIRT clinicians are being cross-trained to provide housing assistance. In addition, clinicians are now responsible for self-dispatching to calls that they believe require their assistance if a vehicle is available. Guidance for clinicians on when to self-dispatch has not yet been developed.
- Mental health follow-up practices are not well defined and historically may have been an inefficient use of CIRT officer resources.
 - According to Police Department staff, a "contact card" is created in the Department's record management system after each mental health call for response. CIRT clinicians are then tasked with following up with these individuals to connect them with mental health resources. However, a system for determining if a follow-up is needed, what information should be gathered, and ensuring contacts are followed up on had not been clearly developed.
 - Based on a review of a sample of CIRT-initiated calls, CIRT is performing follow-up both in-person and virtually; however, about a third of calls do not result in contact and another third did not have enough documentation to determine what occurred as outlined in Table 6.

Table 6: Summary of Mental Health Follow-Ups by Service & Unit Type

Service	Officer & Clinician	Officer Only	Clinician Only	Percent by Service:
Food Box	2	0	0	6.5%
In Person Contact	2	0	0	6.5%
Virtual Contact	5	0	3	25.8%
Contact Attempt	5	0	4	29.0%
Unknown	4	5	1	32.3%
Percent by Unit:	58.1%	16.1%	25.8%	

- Further, about 33 percent of follow-ups were not clearly conducted in person, making it unclear why an officer was also needed on that call.

Why It Matters

Mobile crisis response teams are intended to ensure that people actively experiencing a mental health crisis are provided with appropriate support for their emergency. While the City has established CIRT to help support these individuals, historic dispatching processes and clinician availability hindered CIRT's ability to always respond to those in crisis.

In addition, best practices suggest that law enforcement should only be involved when people in crisis present as a danger to themselves or others to ensure efficient use of finite law enforcement resources. However, historic procedures ensured that all mental health calls were responded to by law enforcement officers, even many crisis follow-up calls. These procedures were not an efficient use of law enforcement resources. Changes to dispatching practices and the combination of the Outreach Unit should help to address some of this inefficiency. Still, clear guidance on call assessment and resource dispatching for mental health calls should be developed to further reduce inefficiency and ensure callers receive appropriate resources.

Recommendations:

6. Create a process to allow for increased diversion of mental health calls that minimizes the involvement of law enforcement officers to the extent possible.

Police Department Comments: *See the next comment. Partnering with the civilian clinical resources has the potential to involved law enforcement involvement.*

Community Services Comments: *Community Services will partner with police to make civilian mental health resources available and responsive to dispatch calls.*

7. Explore options for providing mental health resources to 9-1-1 callers with low-risk levels without involving law enforcement officers.

Police Department Comments: *PD Communications can explore diverting calls directly to clinicians using the in-place protocols for low-threat responses. See comments for number 8 below.*

Community Services Comments: *Community Services will partner with police to make civilian mental health resources available and responsive to dispatch calls.*

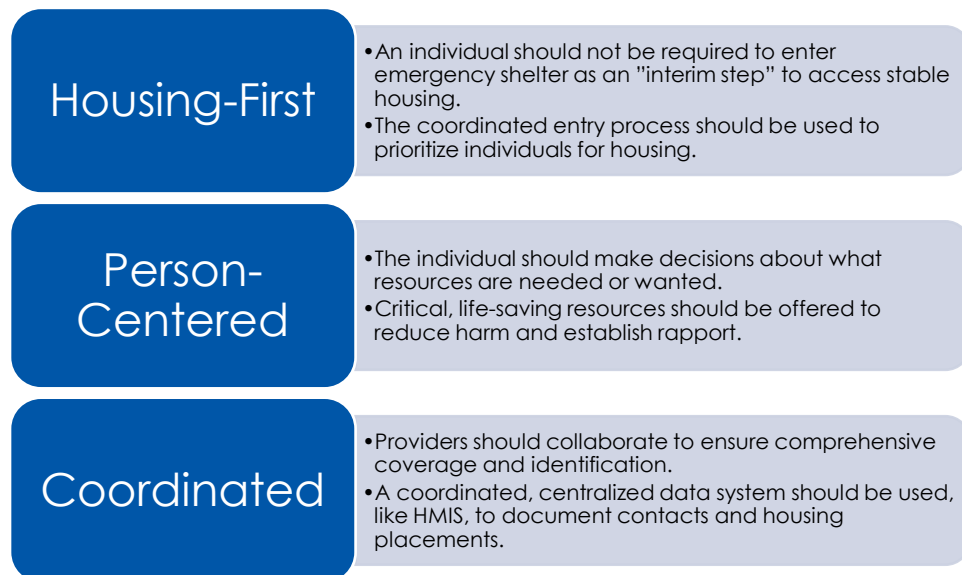
8. Provide guidance to Public Safety Communications on assessing mental health call risk levels to help divert calls from law enforcement when possible. Best practices recommend using the Level of Care Utilization System, or LOCUS, to triage mental health calls.

Police Department Comments: PD Communications currently uses International Association of Emergency Dispatch protocols to triage mental health calls (psychiatric, suicidal, caller in crisis, etc.). Response is based on the scenario presented. LOCUS is a clinician's tool designed to assess the intensity of services needed for individuals receiving treatment, not a rapid assessment tool.

Street Outreach Activities are not Coordinated and Resource Allocation may not Promote Housing Stability Most Effectively

Street outreach is a process by which people living in unsheltered locations are engaged where they are to ensure their basic needs are met while supporting them towards housing stability. The goal of street outreach is to make connections to stable housing with tailored services and supports for each person. To do this, U.S. Interagency Council on Homelessness generally recommends that a community's street outreach efforts be: Housing-First, Person-Centered, and Coordinated.

Figure 6: Street Outreach Best Practices



Data on the following outcomes should be measured and reviewed to assess the effectiveness of street outreach programs:

- Exits to Permanent Housing;
- Length of Time from Unsheltered Homelessness to Housing;

- Interim Services provided such as CE assessments, connections with benefits, documentation completion, interactions with crisis housing, and referrals to outside services.

What We Found

- Historically, City-funded street outreach efforts have not been coordinated to ensure efficiency.
 - The City of Denton has established two street outreach functions: (1) a multi-disciplined Homeless Outreach Team, or HOT, consisting of two police officers, a paramedic, and a licensed clinician generally managed by the Police Department; and (2) one and a half contracted street outreach workers employed by a non-profit organization.
 - While periodic meetings have occurred between HOT, the Street Outreach Contractor, and the Community Services Department, it is not clear that these meetings included case conferencing or other data-sharing activities to ensure efficient use of resources.

For example, during a ride-a-long with the street outreach contractor, street outreach staff stated that they have historically not been informed before an encampment is cleared, requiring them to spend time searching for active clients. Further, a centralized list of active street outreach clients is not maintained, increasing the likelihood that a client is receiving assistance from both functions.
 - A written, coordinated plan to inform and offer assistance to people experiencing unsheltered homelessness during inclement weather events has not been established.
- Based on discussions with residents and observations during this audit, Denton has an active community of individuals ready to assist people experiencing homelessness; however, there is currently no coordinated effort from the City to engage these individuals in official programs or assist with gap mitigation.
- HOT does not appear to effectively connect people experiencing homelessness with housing solutions. This appears to be, at least in part, because police officers are not well positioned to perform street outreach due to a lack of appropriate resources and job duty conflicts.
 - Police officers do not have access to coordinated entry or training on identifying and applying for appropriate housing resources for people experiencing homelessness. While HOT does include a licensed case worker, it was not clear how often this individual performed

- coordinated entry assessments based on reviewed calls. Further, only one percent of HOT-initiated calls resulted in documented emergency shelter placement.
- Police response systems are generally not created to support on-going case management of a person or household. Specifically, based on a review of a sample of HOT-initiated calls, 83 percent did not have documentation about what occurred, hindering understanding of program activities and outcomes.
 - The City has not dedicated financial resources for HOT to use in assisting individuals experiencing homelessness. For example, during a ride-a-long, HOT came across an individual experiencing homelessness who wanted to drive back to Louisiana to stay with a family member but did not have money for gas. HOT was unable to provide him with financial assistance without contacting a non-profit service provider, in this instance the City's street outreach contractor.
 - Assigning street outreach duties to police officers creates conflict with their law enforcement job duties because individuals experiencing homelessness are often violating a law (e.g., trespassing, soliciting in a thoroughfare, etc.) when they are encountered by police officers as previously discussed. This impacts a police officer's ability to use person-centered practices and increases the potential for adversarial relationships and negative interactions.
- The Street Outreach Contractor is generally meeting their contracted housing outcome goals; however, Federal funding to support these outcomes is going away.
 - The City's contract with the Street Outreach Contractor requires them to meet certain outcomes. Based on a review of Fiscal Year 2024 data, the goals related to housing exits appear to be met as shown in Table 7. These outcomes along with ride-a-long observations generally indicate that the Street Outreach Contractor uses housing-first approaches. Still, the contract does not clearly include tracking or reporting on length of time between service.

Table 7: Street Outreach Contractor FY24 Housing Outcome Performance

Outcome Metric	Goal	Performance	Avg. Days to Exit
Individuals Served	235	364	NA
Temporary Housing Exits	39	25	28
Permanent Housing Exits	5	23	74

- Based on ride-a-long observations, the Street Outreach Contractor generally engaged people experiencing homelessness about their

- needs in a person-centered way, such as asking what their needs were and discussing available assistance options. There was indication that Street Outreach Contractor staff had pre-established, positive relationships with some of the people experiencing homelessness that were encountered. When new individuals were encountered, they were engaged in a friendly manner, were offered services, and were given a way to contact the outreach team again (i.e., business card). The Street Outreach Contractor appears to provide perishable life-saving resources, such as water and snacks, but generally does not provide non-perishable items like blankets or clothing.
- In addition to providing about \$125,000 annually for street outreach through the General Fund, the City has granted the Street Outreach Contractor with Federal funds for emergency and supportive housing through the American Rescue Plan Act. This money appears to have been essential to meeting the Street Outreach Contractor's exits from homelessness goals, however, the Federal money used for these programs will run out by Fiscal Year 2026.

Why It Matters

The primary goal of street outreach is to support people experiencing homelessness access to more stable housing. Street outreach is critical in homelessness response because it meets people where they are, helping to lower barriers and increase the number of people using available resources. The City's Street Outreach Contractor appears to be generally functioning in this manner and is meeting its housing outcome goals. However, it will quickly become vital to find ways to continue financially supporting individuals who are being assisted by the Street Outreach Contractor to continue connecting people experiencing homelessness with more stable housing.

While HOT was intended to perform street outreach, it is not clear that this is an efficient use of finite law enforcement resources. As previously stated, police officers generally do not have the appropriate access, resources, or training to connect people experiencing homelessness with more stable housing. Still, additional street outreach resources are needed as many people experiencing homelessness live unsheltered. For these reasons, the City should explore ways to reallocate these resources to more effectively support people experiencing homelessness.

Further, if the City continues funding two street outreach programs, these efforts must be coordinated to ensure that resources are used efficiently. In particular, having a centralized client list, shared data, and regular case conferencing should increase the City's ability to monitor street outreach program outcomes

and effectiveness. Community volunteers, especially those who have previously experienced homelessness, may be helpful to assist with program gaps.

Recommendations:

9. Develop a system for measuring and regularly reporting on street outreach program performance at a City-wide level by identifying and combining key outcome data from all street outreach programs. This system should include standardized data requirements and case management practices that should be communicated to all street outreach providers.

Community Services Comments: *Community Services staff will continue to develop street outreach performance and reporting at a City-wide level. This will require significant coordination with external partners.*

10. Formalize a coordinated procedure for informing and offering assistance to people experiencing unsheltered homelessness during inclement weather events.

Community Services Comments: *Community Services staff will continue to work with internal and external partners to develop processes and procedures to coordinate and inform and support individuals experiencing homelessness.*

11. Consider ways to engage community members in ongoing homelessness response efforts. In particular, explore ways to engage people who have previously experienced homelessness in response efforts.

Community Services Comments: *Staff will explore opportunities for community members to engage in the City's homeless response.*

12. Evaluate ways to reallocate Homeless Outreach Team resources to better align employee job duties with street outreach goals. If resources cannot be reallocated, establish clear guidance for Outreach unit employees on the goals of street outreach, provide mechanisms to financially assist clients with housing stabilization needs, and create written expectations around client data collection, case management, and outcome reporting.

Police Department Comments: *The police department Outreach officers are aligned with the street outreach goals, but always exploring way for the department to work more collaboratively with Community Services personnel should foster a more effective response.*

13. Work with the Street Outreach Contractor to identify and report on additional performance metrics related to length of time from unsheltered homelessness to housing.

Community Services Comments: *Community Services staff will work with the contractor to improve data collection and reporting on street outreach performance.*

14. Assist the Street Outreach Contractor in identifying new funding sources to continue supporting emergency and supportive housing programs.

Community Services Comments: *Community Services will continue to take a more active role in supporting contractors with awareness of funding opportunities and providing technical assistance.*

The Community Shelter Contractor's Practices Do Not Align with Housing-First or Low-Barrier Approaches as Required by Contract

The US Department of Housing and Urban Development and the National Alliance to End Homelessness suggest that emergency shelters for people experiencing homelessness should use low-barrier and housing-first approaches to ensure as many people as possible receive assistance accessing stable housing. Housing-first practices recognize that people who are actively experiencing homelessness cannot fully address other financial or health issues, until they are in a more stable environment such as permanent supportive housing. Best practices suggest that housing-first approaches are effective if people are provided with appropriate supportive services after they are placed in a more stable housing solution.

Further, the premise behind low-barrier approaches is that assistance providers should not make assumptions about a person's desire or ability to succeed in a more stable housing solution based on their previous status. Low-barrier does not mean that behaviors impacting the safety of other people should be tolerated, but that only actual behavior should be used to bar someone from service.

Table 8 summarizes the elements of each of these approaches for emergency shelters.

Table 8: Summary of Emergency Shelter Best Practices

Housing-First	Low-Barrier
• Provide diversion services upon entry. • Prioritize shelter beds for those at greatest risk for severe health and safety consequences. • Eliminate arbitrary exits. • Develop a housing plan within seven days of entry.	• Allow entry 24/7 • No drug & alcohol testing • No criminal background checks • No income requirements • No required service participation • No or limited physical screening procedures before entry • Have simple, community expectations not extensive, punitive rules

Further, best practices recommend that the following metrics be tracked and reported on to understand if emergency shelters are operating effectively:

- Total beds and total unique households served;
- Total households entering shelter;
- Total households exiting shelter and average length of stay;
- Total households exiting shelter to permanent housing and average length of stay; and
- Total households remaining in shelter and average length of stay.

What We Found

- The City of Denton has executed a contract with a non-profit to operate the Denton Community Shelter that generally aligns with best practices.
 - This Management Service Operating Agreement was approved by the City Council in June 2021 and became effective in December 2022 after a temporary certificate of occupancy for the community shelter was issued. Prior to 2023, the City was contracting with this organization to provide emergency shelter services at a smaller location.
 - This contract requires that the Community Shelter Contractor use low-barrier and housing-first approaches including: staying open and accessible twenty-four-seven, not requiring sobriety, giving guests the choice to dispose of drugs or alcohol if found on the premises or leave, not denying or terminating access based on criminal or mental status history, and having clear policies and procedures regarding behaviors or violations of rules that will result in criminal trespass warnings.

- Further, the contract requires that the Community Shelter Contractor provide three types of services as outlined in Figure 7:

Figure 7: Community Shelter Services



- It should be noted that the Community Shelter Contractor has changed operations to increase capacity. In particular, enhanced shelter rooms now have bunk beds, increasing capacity to 64 beds, and offers up to 16 mats for people for one night. While these operational changes allow more individuals to sleep sheltered, they do not necessarily facilitate housing placement for guests and may reduce capacity for people with additional support needs like physical disabilities or those fleeing domestic violence.
- The Community Shelter Contractor has generally not adopted housing-first practices.
 - All new guests at the Community Shelter are required to go through an intake process whereby a coordinated entry assessment should only be completed if the person is literally homeless.⁶ Most shelter guests had a coordinated entry assessment completed, but about 25 percent of guests enrolled in emergency shelter, who are considered literally homeless, did not have a completed assessment as outlined in Table 9.

⁶ A household is considered literally homeless if it: (1) primarily resides in a public or private place not meant for human habitation, (2) lives in a shelter designated to provide temporary living arrangements, or (3) is exiting an institution where they resided for 90 days or less, and resided in a place under (1) or (2) immediately before entering that institution.

Table 9: Coordinated Entry Completion Summary

Service Type	Sampled Guests	Percent with CE
Day Only	18	72%
Emergency	61	75%
Enhanced	11	100%
All:	90	77%

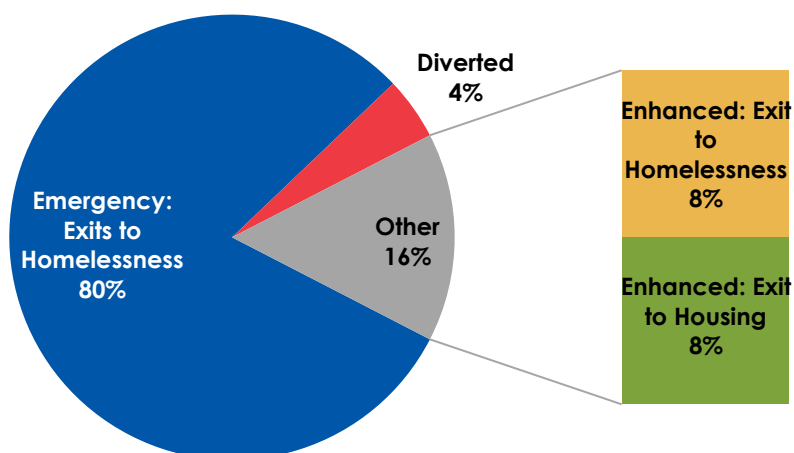
- The Coordinated Entry assessment uses the Vulnerability Index-Service Prioritization Decision Assistance Tool, or VI-SPDAT, to assign each household a number ranging from 0 to 16, with 16 indicating that the household is the most vulnerable. The VI-SPDAT is not used by Community Shelter Contractor staff to prioritize guest access to shelter services. Statistical analysis indicates that shelter guests who receive overnight shelter services generally have a lower VI-SPDAT on average than those who only access day shelter services; however, there was no statistical difference between those enrolled in emergency versus enhanced shelter.
- Community Shelter guests using emergency shelter services are required to enter a lottery to receive a bed. Under this system, names are randomly drawn from those who entered the lottery until all 24 beds are filled. Beds are assigned for one week at a time and guests who do not receive a bed are asked to leave the shelter for the night. Two rooms are “reset” this way each weekday. It should be noted that only three of these ten rooms are designated for women, meaning there are some weekdays when a woman is not able to enter the lottery to receive a bed.

Further, this system does not prioritize guest access to shelter based on health or safety risks and instead necessarily exits individuals back into literal homelessness. Specifically, 88 percent of guests who received overnight shelter were exited back into homelessness after reviewing a sample of case files (see Figure 8).

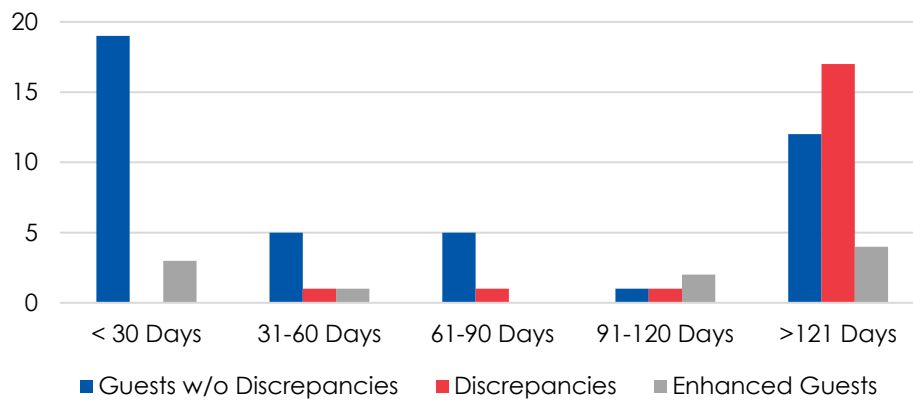
Moreover, Community Shelter guests using enhanced shelter services are not required to enter the lottery system. Instead, according to Community Shelter Contractor staff, guests are moved to enhanced shelter when a bed becomes available and they are “ready.” There is no written application process or criteria for determining when a guest is “ready” to receive enhanced shelter services, increasing the risk that guests are treated inequitably or inconsistently.

- The Ready for Work Program connects guests to employment opportunities before providing housing placement assistance. In addition, potential program candidates must attend specific classes,

- perform 520 hours of volunteer work in the shelter, and submit to regular drug and alcohol testing. This program is not based on a housing-first model.
- The Community Shelter Contractor created a similar program for emergency shelter guests who were “Work Verified.” Under this program, emergency shelter guests who were employed were guaranteed a bed and did not have to enter the lottery system. According to Community Shelter Contractor staff, this program was changed based on direction from the City so that Work Verified guests were still required to enter the lottery but did not have to be there in person to do so. In January 2025, the City revised this instruction.
 - Current staffing resources do not allow for case management services to be effectively provided to all guests.
 - According to best practices, a case manager for housing placement support should generally serve between ten and 20 individuals. Based on discussions with Community Shelter Contractor staff, there are currently four dedicated case managers to support almost 200 guests.
 - According to staff, only guests who are enrolled in enhanced shelter services receive dedicated case management services (i.e., are expected to meet with their case manager weekly and are provided a service plan), meaning that, at most, only about a third of guests—who are selected by shelter staff without a clear, written application or evaluation process—are offered dedicated case management support.
 - Guests not enrolled in enhanced shelter may sign up to speak with a case manager, but if their name is not called the day they sign up they must re-sign up the next day. This system creates barriers for people experiencing homelessness to access housing placement support, especially if they are not guaranteed a bed that night.
 - Based on a review of a sample of case management files, about 11 percent of overnight shelter guests had a service plan. For these individuals, it took 150 days after entering emergency shelter and 47 days after entering enhanced shelter to receive a service plan on average. Only guests who had entered enhanced shelter had a service plan.
 - About eight percent of guests reviewed were exited to a housing solution. All guests exited to a housing solution were enrolled in enhanced shelter and had a service plan. On average, it took 140 days after a service plan was created to exit to a housing solution.

Figure 8: Summary of Shelter Service Exits

- Length of stay data for Fiscal Year 2024 is not reliable.
 - Based on review of 91 guests, 58 were enrolled in emergency shelter. Of these, 20 had emergency shelter service end dates over one month after day shelter service ended. While it is possible for a person to access emergency shelter without using day shelter services (i.e., food, hygiene products, clothes, etc.) it is unlikely. In addition, all 20 of these guests were exited during the last two weeks of January 2024 or on December 17, 2024, indicating a data quality issue with these guests' stay lengths.
 - In addition, only ten of these 20 guests appeared to have actually received services during Fiscal Year 2024, and one guest did not appear to have ever received services in Denton, indicating unique guest data may also be inaccurate.
 - Based on discussions with Community Shelter Contractor staff, these discrepancies were due to historic data entry processes. In particular, all guests were enrolled in emergency shelter upon intake, before it was determined if they were assigned a bed. According to staff, this practice changed in April 2024 so that overnight shelter service enrollment is updated each night. These data quality issues are illustrated in Figure 10.

Figure 9: Emergency Shelter Length of Stay Frequencies

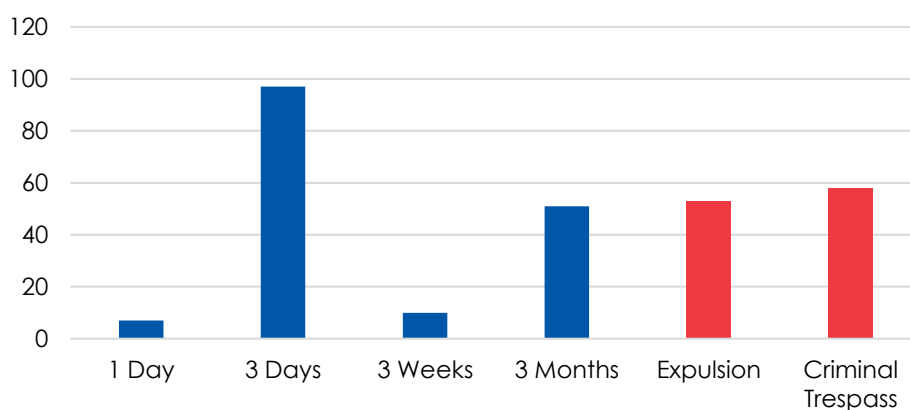
Some emergency shelter guests may have longer lengths of stay due to the Work Verified program; however, the frequency chart indicates there may be more data discrepancies than just the 20 identified.

- The Community Shelter Contractor has adopted some low-barrier practices; however, barriers could be further lowered.
 - To enter the Community Shelter there are no income requirements, there is no drug or alcohol testing, there are no criminal background checks, and there is no required program participation—though it should be noted overnight guests are asked to perform an “effort” (i.e., a chore) to help keep the shelter clean.
 - Still, the City’s contract requires the community shelter contractor to “[e]nsure immediate and easy access to shelter by . . . staying open and accessible 24/7.” According to shelter staff, individuals are generally not allowed to enter the facility after 8:00 p.m. and guests must “check-in” by 6:00 p.m. or lose their assigned bed. This indicates that the shelter is not open and accessible, even for guests with beds, twenty-four-seven.
 - Further, the shelter requires all guests to empty their pockets, allow a bag inspection to occur, and submit to a handheld metal detector screening before entering the shelter, which contradicts low-barrier best practices.
- The Community Shelter Contractor has adopted extensive rules that are not always clearly documented and a punitive punishment system.
 - The Community Shelter Contractor provides a “Welcome Packet” to all guests upon entry that includes a list of 18 “Expectations” and 13 “Announcements” as well as policies on Substance Use, Weapons,

Storage, and Pets. Guests are required to sign the packet acknowledging they understand these rules before entry.

- As required by contract, the Community Shelter Contractor has adopted a clear policy and procedure regarding violations of rules that result in removal from the Community Shelter, known as the Progressive Discipline Chart. The Progressive Discipline Chart is not provided as part of the Welcome Packet.
- The Progressive Discipline Chart directly contradicts the contract regarding punishment for drugs and alcohol. The contract states, "Those found using, selling, or possessing drugs or alcohol will be given the opportunity to dispose of the items or asked to exit the shelter for the night." The Progressive Discipline Chart prescribes at least a three-day suspension for "possession of contraband inside the facility" and requires issuing a criminal trespass for selling drugs on the property.⁷
- During Fiscal Year 2024, 111 individuals were expelled from the Community Shelter, about half of whom were also criminally trespassed according to the Community Shelter Contractor's records. In addition, 167 suspensions of varying lengths were issued as illustrated in Figure 10. Based on a review of a sample 38 punishments issued, 95 percent aligned with this policy.

Figure 10: FY24 Punishment Type Frequency Chart



- Based on a review of a sample of incident reports, about a quarter of incidents resulted in a longer suspension than would otherwise have been imposed due to the "progressive" nature of the Community Shelter Contractor's punishment system (i.e., if someone has already been suspended for three days, they must next be suspended for three weeks even if the violation is a three-day violation).

⁷ The Welcome Packet includes alcohol, drugs, and drug paraphernalia in the "Prohibited Contraband" category under the Substance Use Policy.

- Almost a third of punishments were issued after a person broke a rule that was not clearly outlined in the Welcome Packet (e.g., entering emergency shelter rooms during the day, sleeping in their vehicle while on the property, trying to get a second serving of food, etc.). Further, it is not always clear that a suspension is based on behavior that causes a safety risk based on auditor reviews of related incident reports. The results of this assessment are outlined in Table 10. Punishment decisions are entirely made by security staff and are not reviewed by or discussed with a case manager or other assistance provider.

Table 10: Punishment Reasonableness Review Summary

Punishment	Assessed Safety Risk		
	Low	Medium	High
1 Day	1	0	0
3 Days	6	5	0
3 Weeks	4	2	0
3 Months	2	2	0
Expulsion	1	2	4
Criminal Trespass	2	4	2
All:	16	15	6

- Based on a review of the sample, over half of people were expelled because they refused to leave the property, generally after being approached by staff after some other less serious issue occurred. This is illustrated by the relatively higher number of criminal trespasses issued for lower-risk behavior (i.e., almost 60 percent of expulsions were for high-risk behavior and only 25 percent of criminal trespasses were for high-risk behavior).
- In addition, the Progressive Discipline Chart states that each quarter expulsions, including issued criminal trespasses, should be reviewed to determine if they should be lifted. Based on a review of the Community Shelter Contractor's expulsion and suspension spreadsheet, only one quarterly review occurred in the first quarter of Fiscal Year 2024. In addition, while the Community Shelter Contractor staff stated they have contacted the Police Department to lift criminal trespasses, Police Department records do not indicate that any criminal trespasses have ever been lifted from the Community Shelter.
- Finally, based on a review of all documented expulsions, five individuals have been expelled from the shelter based on the violation "Board Issued/Approved." One of these individuals was included in the sample review and the incident report only stated, "Expelled Per [the Community Shelter Contractor] Board of Directors."

- The City has not historically requested or received feedback from Community Shelter guests.
 - The Community Shelter Contractor has designed a system to accept guest feedback; however, City staff has not previously requested to review this information as allowed by contract.
 - Further guests are required to request a grievance form from Community Shelter Contractor staff, which may discourage individuals from submitting grievances. Guest grievances have also not been previously requested or provided to City staff.

Why It Matters

Emergency shelters are intended to be places where people experiencing homelessness can receive assistance accessing more stable housing as well as short-term support needed due to a crisis. To do this, best practices suggest that people not be excluded from accessing emergency shelter unless there is a behavior-based safety concern and that shelter programming be focused on connecting people to more stable housing. Without this focus, people experiencing homelessness are less likely to be connected to more stable housing.

While the City's contract specifies that the Community Shelter Contractor should use low-barrier and housing-first approaches in shelter operations, this had not generally been their practice, resulting in about 88 percent of overnight guests exiting back into homelessness and many not clearly receiving assistance to access more stable housing. In addition, while people's criminal and mental history and sobriety status are not used to initially bar people from entering, the rules and punishment system may exclude more people experiencing homelessness from accessing support than is appropriate.

Finally, accurate data is critical to understanding an emergency shelter's performance and housing outcomes. Without accurate data, it is difficult to assess how many people are being served and if that service is effective. Further, this information is useful to understand how the housing stability assistance system operates as a whole as housing placements are ultimately dependent upon availability.

Recommendations:

- 15.** Work with the Community Shelter Contractor to eliminate arbitrary exits caused by the lottery system to allow for a greater focus on housing placement. A prioritization system should be developed to ensure limited resources are provided equitably.

Community Services Comments: *Community Services is seeking Council direction on proposed solutions to arbitrary exits and the lottery system. If approved, staff will bring forward a proposal to develop criteria for shelter stays that ensure a focus on housing placement.*

16. Ensure all guests at the Community Shelter receive dedicated case management support and receive a housing plan shortly after entry.

Community Services Comments: *Staff is seeking Council direction on proposed solutions to ensure all guests at the community shelter receive case management and a housing plan within seven days of entry. If approved, staff will work to implement.*

17. Develop a process to verify that performance metrics reported by the Community Shelter Contractor are accurate. Community Services staff should at least use HMIS access to spot-check case files.

Community Services Comments: *Staff are seeking council recommendation on several changes to the MSOA agreement. The contract renegotiation will require accurate reporting requirements that will be closely monitored by Community Services staff.*

18. Work with the Community Shelter Contractor to establish written procedures for reviewing guest suspension and expulsions. This process should include evaluating rules regularly to avoid creating or escalating conflicts and minimizing suspension lengths to ensure those in need can access services safely.

Community Services Comments: *If Council approves staff recommendations, staff will work with the contractor to establish clear guidelines for guest stays and suspension and expulsions.*

19. Regularly review Community Shelter guest feedback including comments and grievances. Consider creating a process for shelter guests to anonymously or directly report grievances to City staff.

Community Services Comments: *Staff will begin reviewing all available feedback and will investigate developing a direct feedback mechanism.*

Audit Project Background

The Internal Audit Department is responsible for providing: (a) an independent appraisal⁸ of City operations to ensure policies and procedures are in place and complied with, inclusive of purchasing and contracting; (b) information that is accurate and reliable; (c) assurance that assets are properly recorded and safeguarded; (d) assurance that risks are identified and minimized; and (e) assurance that resources are used economically and efficiently and that the City's objectives are being achieved.

Auditing Standards

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Management Responsibility

City management is responsible for ensuring that resources are managed properly and used in compliance with laws and regulations; programs are achieving their objectives; and services are being provided efficiently, effectively, and economically.

Objectives, Scope, and Methodology

The City Auditor's Office has completed an audit of the City's homelessness response activities including enforcement actions, street outreach activities, and emergency shelter operations. This report is intended to provide assurance that the City's response to homelessness is effective, equitable, and in compliance with applicable regulations and guidance.

Audit fieldwork was conducted during December 2024, and January, February, and March 2025. The scope of review varied depending on the procedure being performed. The following list summarizes major procedures performed during this time:

- Reviewed documentation to develop criteria including documented policies, State of Texas regulations, City requirements, and best practices supported by the U.S. Department of Housing and Urban Development;

⁸ The City of Denton Internal Auditor's Office is considered structurally independent as defined by generally accepted government auditing standard 3.56.

- Interviewed Community Services Department, Police Department, Municipal Court, and contracted non-profit staff;
- Compared State and local laws to Federal guidance to identify which laws may impact people experiencing homelessness;
- Observed street outreach activities conducted by the Homeless Outreach Team and contracted street outreach staff and volunteered at the Denton Community Shelter;
- Reviewed a statistical sample of 93 Police Department CIRT and MENTAL calls to determine unit response and documented outcomes;
- Reviewed a statistical sample of 92 Police Department OUTREACH calls to determine unit response and documented outcomes;
- Reviewed outreach outcome data provided by the Street Outreach contractor and compared actual Fiscal Year 2024 outcomes to contracted goals;
- Reviewed a sample of Denton Community Shelter guest case files to determine outcomes and evaluate data accuracy; and
- Examined a sample of Denton Community Shelter incident reports to evaluate safety risks and punishment decisions.

Appendix A: Management Response Summary

The following summarizes the recommendations issued throughout this report. The auditors found that staff and the Department were receptive and willing to make improvements to controls where needed. Management has provided their response to each recommendation.

1	Centrally track all large encampment locations and regularly monitor encampment sites to help inform closure and cleaning decisions.	Agree
Responsibility:	Homeless Programs Manager	Expected Completion: FY25-26, Q2
2	Update the Encampment Response Guidelines to align with State law.	Agree
Responsibility:	Homeless Programs Manager	Expected Completion: FY24-25, Q4
3	Provide notice of encampment closures, at least, in English and Spanish.	Agree
Responsibility:	Homeless Programs Manager	Expected Completion: FY24-25, Q4
4	Explore options for providing temporary storage to people experiencing homelessness.	Partially Agree
Responsibility:	Homeless Programs Manager	Expected Completion: FY25-26, Q1
5	Develop a systematic process to assess and monitor encampments on private property to minimize health and safety risks.	Agree
Responsibility:	Homeless Programs Manager	Expected Completion: FY25-26, Q2
6	Create a process to allow for increased diversion of mental health calls that minimizes the involvement of law enforcement officers to the extent possible.	Agree
Responsibility:		Expected Completion: FY, Q
7	Explore options for providing mental health resources to 9-1-1 callers with low-risk levels without involving law enforcement officers.	Partially Agree
Responsibility:		Expected Completion: FY, Q
8	Provide guidance to Public Safety Communications on assessing mental health call risk levels to help divert calls from law enforcement when possible.	Disagree

Responsibility:	Expected Completion:	FY, Q
9 Develop a system for measuring and regularly reporting on street outreach program performance at a City-wide level by identifying and combining key outcome data from all street outreach programs.		Agree
Responsibility: Homeless Programs Manager	Expected Completion:	FY25-26, Q2
10 Formalize a coordinated procedure for informing and offering assistance to people experiencing unsheltered homelessness during inclement weather events.		Agree
Responsibility: Homeless Programs Manager	Expected Completion:	FY25-26, Q1
11 Consider ways to engage community members in ongoing homelessness response efforts.		Agree
Responsibility: Homeless Programs Manager	Expected Completion:	FY25-26, Q2
12 Evaluate ways to reallocate Homeless Outreach Team resources to better align employee job duties with street outreach goals.		Partially Agree
Responsibility:	Expected Completion:	FY, Q
13 Work with the Street Outreach Contractor to identify and report on additional performance metrics related to length of time from unsheltered homelessness to housing.		Agree
Responsibility: Homeless Programs Manager	Expected Completion:	FY25-26, Q2
14 Assist the Street Outreach Contractor in identifying new funding sources to continue supporting emergency and supportive housing programs.		Agree
Responsibility: Homeless Programs Manager	Expected Completion:	FY24-25, Q4
15 Work with the Community Shelter Contractor to eliminate arbitrary exits caused by the lottery system to allow for a greater focus on housing placement.		Agree
Responsibility: Homeless Programs Manager	Expected Completion:	FY25-26, Q1
16 Ensure all guests at the Community Shelter receive dedicated case management support and receive a housing plan shortly after entry.		Agree

Responsibility:	Homeless Programs Manager	Expected Completion:	FY24-25, Q4
17	Develop a process to verify that performance metrics reported by the Community Shelter Contractor are accurate.		Agree
Responsibility:	Homeless Program Manager	Expected Completion:	FY24-25, Q4
18	Work with the Community Shelter Contractor to establish written procedures for reviewing guest suspension and expulsions.		Agree
Responsibility:	Homeless Program Manager	Expected Completion:	FY24-25, Q4
19	Regularly review Community Shelter guest feedback including comments and grievances.		Agree
Responsibility:	Homeless Program Manager	Expected Completion:	FY24-25, Q3