

**OFFICE OF
THE CITY AUDITOR**

REPORT

CITY'S RESPONSE TO HOMELESSNESS AUDIT

May 27, 2022

Report Summary

BACKGROUND

In April 2022, there were an estimated 2,765 individuals in Edmonton experiencing homelessness. Homeward Trust is the not-for-profit organization designated by the Federal government, the Province of Alberta, and the City of Edmonton (City) to lead Edmonton's plan to end homelessness.

The City's response to homelessness includes providing an annual subsidy of \$1.2 million to further Homeward Trust's work. As well, the City performs a variety of roles and activities to respond to homelessness. These include funding agencies to provide outreach services, directly providing services that include activating the extreme weather response, creating temporary washroom and shelter accommodations, and responding to encampments on public land. The City also funds affordable housing and supportive housing, while also advocating for funding for affordable housing and homelessness supports from other levels of government.

AUDIT OBJECTIVES & SCOPE¹

Our audit objective was to determine if the City of Edmonton coordinates its internal homelessness activities to achieve its intended outcomes. This audit did not review Homeward Trust, its processes, operations, and funding from external sources.

WHAT WE FOUND

The City has an overall target for homelessness in Edmonton's City Plan - no chronic or episodic homelessness in Edmonton. However, the City does not have a corporate-wide plan that defines the strategy and integrates and coordinates the activities that support its internal response to homelessness. The City also does not have a single dedicated position or body that is accountable and has the proper authorities to coordinate this work.

¹ We conducted this engagement in conformance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

We also found that the City does not have an evaluation process to assess the overall impact that its internal response to homelessness activities are having on Edmonton's homelessness population.

RECOMMENDATIONS

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| Recommendation 1 | We recommend that the City Manager develops a corporate-wide homelessness plan that defines the strategy and integrates and coordinates the City's internal response to homelessness. |
| Recommendation 2 | We recommend that the City Manager assign accountability for the delivery of the corporate-wide homelessness plan and its activities. |
| Recommendation 3 | We recommend that the City Manager develops performance measures and evaluate whether the corporate-wide homelessness plan is achieving the desired results. |

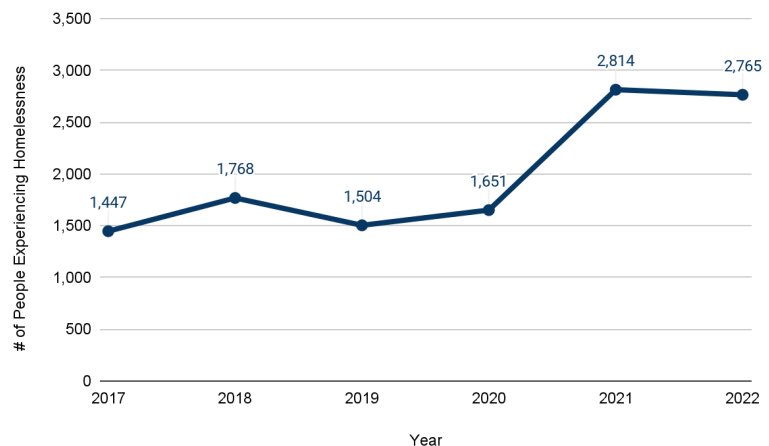
WHY THIS IS IMPORTANT

Homelessness in Edmonton has increased. A clear plan, accountability, and evaluation can help clarify the City of Edmonton's role in the broader community-led effort to end homelessness and improve decision making, reduce operating conflicts, and quantify the value of the work performed.

Homelessness in Edmonton

In April 2022, there were 2,765 individuals experiencing homelessness in Edmonton. Of these 14 percent live in shelters, 20 percent live outdoors, 51 percent are provisionally accommodated (living in temporary housing or couch-surfing), and it is unknown where the remaining 17 percent are living.

The figure below shows the number of people experiencing homelessness in Edmonton since 2017. This number increased significantly between April 2020 and April 2022 mainly due to the impact of the COVID-19 pandemic. Prior to the pandemic, Edmonton had reduced overall homelessness by 50 percent since 2008.



Source: Homeward Trusts' By Names List (as of the end of April of each year)

ROLES AND RESPONSIBILITIES

Ending homelessness falls under Federal and Provincial jurisdiction. In Edmonton, these governments and the City have designated Homeward Trust to lead implementation of Edmonton's plan to end homelessness (A Place to Call Home: Edmonton's Updated Plan to End and Prevent Homelessness). The City and partners support Homeward Trust in fulfilling its mandate. The City and partners also deliver programs and services in response to homelessness.

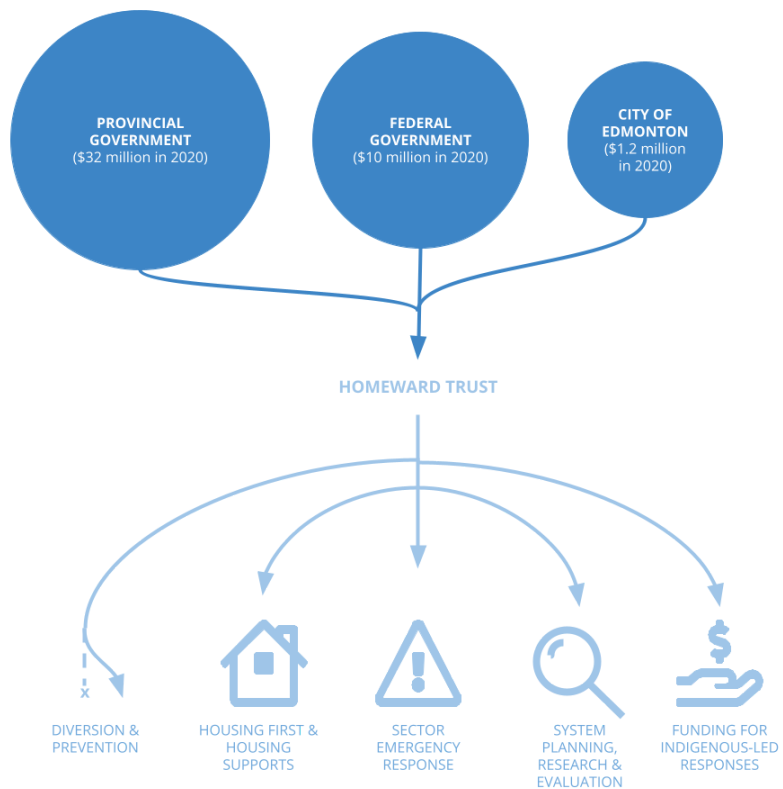
Federal and Provincial Governments

Provide funding to Homeward Trust to achieve goals under the Government of Canada's National Housing Strategy and Alberta's 10 Year Plan to End Homelessness. Also provides capital funding to the City for affordable and supportive housing units.

Homeward Trust

The Federal and Provincial governments and the City of Edmonton have designated Homeward Trust to take on day-to-day system operations and strategy work needed to end homelessness in Edmonton.

Homeward Trust uses the funds it receives from all three levels of government to meet local priorities related to homelessness.



Annually, Homeward Trust provides an accountability report to the City discussing how it used City funds to further the overall plan to end homelessness in Edmonton.

Homeward Trust is also responsible for developing and maintaining an integrated Homeless Management Information System that tracks pertinent data needed to evaluate the ongoing state of homelessness in Edmonton.

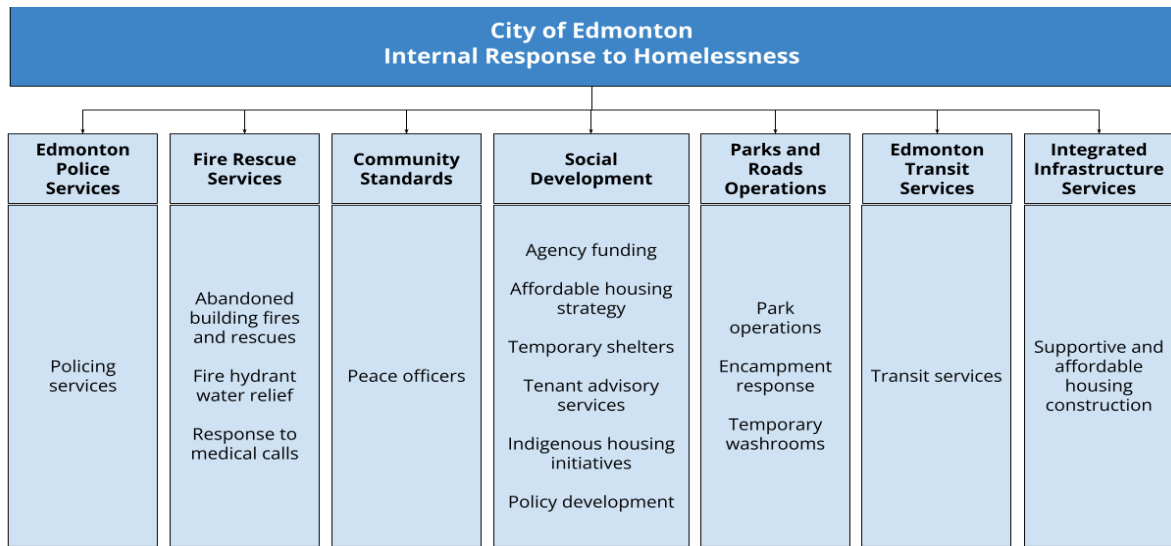
City of Edmonton

Funder - Provides funding to support Homeward Trust's mandate to end homelessness in Edmonton, to non-profit organizations that carry out critical outreach and shelter services, and to housing providers for capital construction of affordable and supportive housing units.

Partner - The City coordinates and collaborates with various external agencies, like REACH Edmonton and Boyle Street Community Services, to align efforts, improve service delivery, address emerging issues, and provide important services like supports during extreme weather and outreach to encampments.

Advocator - Advocates for supportive housing and supports for people experiencing homelessness from the provincial and federal governments.

Service Provider - The City provides a variety of services in responding to homelessness. Prior to the Covid-19 pandemic, the City's internal response mainly focused on its response to encampments (including the provision of outreach services to facilitate connections to housing, enforcement, and clean-up), and providing additional supports to vulnerable people during periods of extreme weather. Homelessness has increased as a result of economic and social factors from the pandemic. In response, the City has had to perform activities that are emergent in nature. This includes setting up temporary shelters and warming spaces, increased enforcement, and temporary washrooms. These activities are supported by at least six branches and the Edmonton Police Service.



Recommendation 1 & 2: Corporate-wide Plan and Accountability

RECOMMENDATION 1

We recommend that the City Manager develops a corporate-wide homelessness plan that defines the strategy and integrates and coordinates the City's internal response to homelessness.

RECOMMENDATION 2

We recommend that the City Manager assign accountability for the delivery of the corporate-wide homelessness plan and its activities.

KEY FINDINGS

The City performs a variety of activities across different branches and business areas to support its internal response to homelessness. Coordination between business areas occurs for some of these activities.

The City does not have a corporate-wide plan that integrates, coordinates, and ensures appropriate resources exist for all of the activities that inform its response to homelessness. Additionally, the City does not have a single dedicated position or body that is accountable and has the proper authorities to coordinate this work. This has resulted in challenges with balancing different operational priorities. It has also created an incomplete understanding of the total cost to the City in carrying out these activities.

INTEGRATED PLAN

To avoid organizational inefficiencies and effectively address the complex nature of homelessness, research suggests that an integrated, coordinated, cross-departmental approach is

needed². This approach should be supported by a plan with defined values, goals, targets, and processes that collect, share, and evaluate meaningful data across the response's stakeholders.

The City does not have a corporate-wide plan that integrates and coordinates all the activities that inform its response to homelessness. It also does not have a plan that links all of the activities and their related resources to a defined strategy with defined outputs and outcomes.

The lack of a corporate-wide plan has led to limited coordination for some activities, challenges with balancing different operational priorities, and an incomplete understanding of the total costs spent by the City to support its internal response to homelessness.

Limited coordination of homelessness response activities corporate-wide

In responding to homelessness, the City does coordinate some activities but they are limited in scope. Examples include:

1. The Housing Response Team Steering Committee. This committee provides strategic direction and approval on activities, tasks, and deliverables for the goals set out in the Affordable Housing Investment Plan (2019-2022) including supportive housing. The committee consists of members from leadership that include Deputy City Managers, Branch Managers, and Directors across several departments in the City.
2. The Encampment Response Team partners with some business areas and external providers to support the well-being of people staying in encampments. They also connect them to services before they take enforcement and clean up action.
3. The Community Outreach Transit Team. This pilot program is a joint-effort among City business areas to

² Nichols, N., & Doberstein, C. (Eds.). (2016). Exploring Effective Systems Responses to Homelessness. Toronto: The Canadian Observatory on Homelessness Press.

provide social and safety supports to vulnerable individuals within Edmonton's transit system.

However, there are many different City business areas that carry out activities to support the City's internal response to homelessness. There is nothing corporate-wide to link and guide all of the activities of these committees and business areas in an integrated and coordinated way.

Balancing different operational priorities

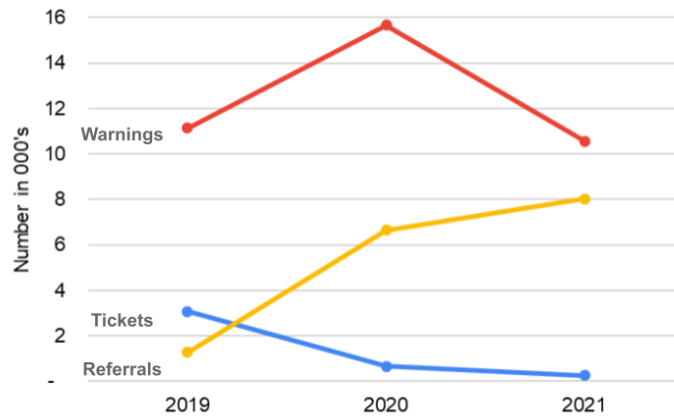
The City Plan sets out guiding strategies for urban life in Edmonton. This includes the values and outcomes envisioned for how public space is to be used, made equitable, inclusive, and kept safe and secure.

At the operational level, it is challenging to balance these values and outcomes. For example, peace officers have to balance the enforcement of bylaw provisions that keep public spaces, such as parkland and transit, safe and secure with the values and outcomes that strive to ensure that those same spaces remain accessible and inclusive for individuals experiencing homelessness.

In response, the Branch has adopted an approach that educates an individual about a bylaw infraction, refers them to social supports, and/or issues a warning all before issuing a ticket.

From 2019 to 2021, this approach has led to the reduction of tickets and warnings for bylaw infractions most likely to impact individuals experiencing homelessness and an increase in referrals.

2019 to 2021 referrals and warnings versus tickets issued to individuals with no fixed address



The Branch's decision to not enforce the bylaws has led to peace officers issuing fewer tickets. However, without a corporate-wide plan and outcomes measurement in place, it is not clear how this approach impacts the City's overall strategy to respond to homelessness.

Total cost of internal homelessness response activities

The City does not consolidate the costs relating to the activities and funding decisions made in carrying out its internal response to homelessness. As a result, the total cost spent by the City on its internal response to homelessness cannot be easily determined. Instead, cost information for various activities are spread over a variety of council reports, budget documents, and internal reports. We were able to gather the following data from this information:

2021 Response Activity	Cost to the City (In \$000's)
Affordable Housing & Homelessness Business Area	\$20,312
Encampment Park Rangers	\$1,200
Encampment Clean-up	\$778
Encampment Outreach - Service Provider	\$792
Homeward Trust Funding	\$1,238
Community Outreach Transit Team	\$470

The City also provides in-kind services to support some of its response activities. These activities did not have operational budgets assigned to them. For example, the in-kind services provided by various business areas in the City for the Commonwealth Shelter in 2021 included:

- Providing security services
- Providing garbage bins
- Providing insurance and claims services
- Providing community-based support, including information and resources for those experiencing safety concerns in the area

The responsible business areas absorbed these costs. This can have a negative impact on the delivery of other services for which the business areas are responsible.

ASSIGN ACCOUNTABILITY

Multiple branches and business areas support the City's internal response to homelessness. Currently, management in each area are accountable and responsible for their own budgets. There is no single position or centralized body that is accountable for the City's internal response to homelessness. Good practice suggests that self-coordination of a response to homelessness is unlikely to happen where it needs to happen, and in a consistent way, without sustained and empowered leadership³. Assigning accountability and authority for the coordination of this plan will provide corporate oversight and consistency with how decisions are made to achieve the City's internal response to homelessness.

WHY THIS IS IMPORTANT

A corporate-wide plan will allow the City to define an integrated and coordinated strategy for its homelessness response activities. This would help the City clarify its role, values, and the activities involved in supporting its internal response to homelessness. It would also help the City centralize, quantify,

³ Nichols, N., & Doberstein, C. (Eds.). (2016). *Exploring Effective Systems Responses to Homelessness*. Toronto: The Canadian Observatory on Homelessness Press.

and monitor the total costs associated with all of the activities that support its internal response.

RECOMMENDATION 1
MANAGEMENT RESPONSE

Develop a corporate-wide homelessness plan that defines the strategy and integrates and coordinates the City's internal response to homelessness.



Responsible Party

City Manager



Accepted by Management

Management Response

Administration recognizes the value of a single, coordinated, and integrated corporate plan to define the City's role in the broader community effort to address homelessness. This plan can be used to define expectations and service levels to better enable Administration to plan proactively to deliver the results City Council and Edmontonians expect.

This plan will build on the Community Safety and Well-Being Strategy approved by City Council and Edmonton's broader community Plan to End Homelessness, which is stewarded by Homeward Trust Edmonton.



Implementation Date

December 31, 2023

**RECOMMENDATION 2
MANAGEMENT RESPONSE**

Assign accountability for the delivery of the corporate-wide homelessness plan and its activities.

**Responsible Party**

City Manager



Accepted by Management

Management Response

The corporate-wide response to homelessness crosses multiple business areas whose respective mandates are not necessarily focused on homelessness. Administration recognizes the benefits of a dedicated unit that is accountable for homelessness response and responsible for leading coordination, centralizing program evaluation efforts and making recommendations to senior management including improved role clarity and centralizing the monitoring and evaluation functions of the response.

Administration will investigate effective approaches for accountability for municipal responses to homelessness, and adopt the most effective model that best suits the Edmonton context.

**Implementation Date**

December 31, 2023

Recommendation 3: Program Evaluation

RECOMMENDATION 3

We recommend that the City Manager develops performance measures and evaluate whether the corporate-wide homelessness plan is achieving the desired results.

KEY FINDINGS

The City's long-term target for homelessness is that there is no chronic or episodic homelessness in Edmonton. The City evaluates the achievement of this target against the number of people experiencing homelessness in Edmonton, based on data provided by Homeward Trust.

However, the City does not evaluate its internal response activities as a collective set of work and effort to better understand the overall impact they are having on homelessness in Edmonton. This is because performance measures, and the data needed to support those measures, have not been defined for the City's internal response to homelessness.

PERFORMANCE MEASURES

Performance measures and targets exist for some of the City's internal homelessness response activities which allow for their individual evaluation. For example, the Affordable Housing Strategy is evaluated against the number of affordable housing units built to date when compared to the goal of building 2,500 units by 2022. The City's Encampment Strategy is evaluated against several goals including connecting individuals in encampments to safe, adequate, and culturally appropriate housing.

The City has not yet developed performance measures for its overall internal response to homelessness. This is because the City has yet to define the strategy, desired impact, and

expected outcomes of its overall internal response to homelessness.

DATA COLLECTION

The City is collecting data for some of its internal homelessness response activities. This includes:

Activity	Type of Data Collected	2020	2021
Supportive Housing	# of permanent supportive housing units built and in progress	507 units from 2018 to 2021	
Encampment Response	# of encampment calls	4,098	6,578
	# of encampments cleaned	1,477	1,777
	# of needles collected	10,306	19,828
	# of people housed in permanent housing	267	289
Enforcement Services	# of tickets issued from provisions that may affect homelessness	648	244
	# of warnings issued	15,668	10,576
	# of referrals	6,656	8,033
Temporary Washrooms	# of washroom visits	37,229	90,218

This information is useful within the operational areas as it informs their daily work. However, as a collective set of data, it does not help the City understand the overall impact its internal response activities are having on homelessness in Edmonton.

The City should also review its data for accuracy and reliability. For example, some members from the encampment team were

counting the number of encampments cleaned by location and others by the number of structures at a location. A consistent method of counting would support the integrity of the underlying data and any future decisions that were based on that data.

WHY THIS IS IMPORTANT

Without performance measures and evaluation, it is difficult to assess whether the City's homelessness plan and activities are effective and impactful.

RECOMMENDATION 3 MANAGEMENT RESPONSE

Develop performance measures and evaluate whether the corporate-wide homelessness plan is achieving the desired results.



Responsible Party

City Manager



Accepted by Management

Management Response

Administration values ongoing performance measurement and evaluation exercises and undertakes these frequently with respect to individual interventions and programs. However, we agree there is an opportunity to consolidate this work into a single evaluation framework to streamline efforts and reporting. Wherever necessary and possible, the performance measurement and evaluation plan will integrate data from external parties in order to better understand the broader outcomes of the whole homeless serving system of care, and how the City's efforts contribute to the collective efforts of partner organizations.

**Implementation Date**

December 31, 2023

ACKNOWLEDGEMENT

We would like to thank all the staff and management involved in this audit for their cooperation and support.