

Part 1 of the Audit of Emergency Shelters: A Focus on Case Management

Date: May 20, 2022
To: Audit Committee
From: Auditor General
Wards: All

SUMMARY

The Auditor General's Annual Work Plan includes a series of audits along the housing continuum. This series of audits is timely as the City continues to move forward with delivering its priority actions identified in the Homelessness Solutions Service Plan and the HousingTO 2020-2030 Action Plan.

Our audit of emergency shelter operations, overseen by the City's Shelter, Support and Housing Administration (SSHA) Division was conducted in several parts.

- This report addresses the City's delivery of housing case management supports at emergency shelters.
- A separate report addresses the City's use of hotels to provide emergency shelter.

According to SSHA's 2020 Annual Report, permanent housing solutions for homelessness recognize that housing is inherent to the dignity and well-being of a person, a determinant of health, and an efficient and a cost-effective use of resources.

Housing First focuses on helping people to find permanent housing as quickly as possible, with the supports they need to live as independently as possible. The underlying philosophy of Housing First is that people are more successful in moving forward with their lives if they first have housing.

SSHA is committed to achieving the priority goals set out in its 2021 Homelessness Solutions Service Plan. This report provides a roadmap to support SSHA to more effectively guide each client on their journey towards stable housing. The recommendations outline the need for consistency and robust infrastructure to ensure a more efficient and effective approach to improving outcomes for shelter clients. The audit results align with SSHA's "pivot to housing"¹, and the priority actions identified in its Homelessness Solutions Service Plan and in the HousingTO 2020-2030 Action Plan.

¹ According to the [2020 Annual Report for Shelter, Support and Housing Administration \(toronto.ca\)](https://www.toronto.ca) the "pivot to housing" is a commitment to shift from a focus on emergency response to homelessness to a focus on permanent housing solutions.

Our report draws attention to three key areas to help set up SSHA and its clients for success:

1. Increasing the focus on case management
2. Improving the homelessness and housing information system
3. Focusing on housing is an efficient and cost-effective use of resources

Implementing the 12 recommendations in this report supports SSHA in its “pivot to housing” as it shifts from a focus on emergency response to homelessness to a focus on permanent housing solutions which recognizes that Housing First can achieve better outcomes for people experiencing homelessness.

RECOMMENDATIONS

The Auditor General recommends that:

1. City Council request the General Manager, Shelter, Support & Housing Administration, in consultation with key stakeholders including shelter providers, to review and update the Toronto Shelter Standards and shelter provider operating agreements, in order to clarify the City’s minimum expectations related to, but not limited to, the following areas:

- a. the extent to which shelter providers must use the City’s homelessness and housing information system to record case management activities
- b. case notes, documentation, or other records on the client’s “service plan”, “financial plan”, and “housing plan”, that shelter staff (case workers) are required to record in the City’s homelessness and housing information system to ensure there is a complete record of service provided to clients, and to facilitate information sharing in support of continuity of approach or care going forward
- c. standardized processes and tools that can be used to support consistent adoption of good practices for case management by all shelter providers to engage clients in developing individualized goals and making an ongoing commitment to work towards achieving those goals and housing outcomes.

2. City Council request the General Manager, Shelter, Support & Housing Administration, to ensure the City’s homelessness and housing information system is configured to be able to collect data, with a client's consent, that will then be analyzed at a system- and program-wide level, in order to develop targeted approaches to addressing and improving outcomes for people experiencing homelessness, and to inform decisions about how much space must be added to the shelter system to accommodate clients where staying in shelters is not a short-term, temporary measure. Such data could include:

- a. age, nature and degree of supports for mental and physical health conditions, and other factors, which may be determinants of chronicity
- b. system trigger, flag, or other means in the information system to identify if shelter clients are unwilling to participate in case management or are not making significant progress in their case management goals, the reason(s), and whether a service restriction has been implemented, to see if there are solutions that can be found
- c. system trigger, flag, or other means in the information system to identify shelter clients that move frequently between programs and/or shelter locations, and the reasons, to help ensure continuity of approach or care.

3. City Council request the General Manager, Shelter, Support & Housing Administration, to:

- a. conduct cost-benefit analysis on creating a permanent housing solution, potentially in situ, for seniors and others with significant physical and mental health support needs, including the potential for converting shelter programs for long-term shelter clients who require significant physical and mental health supports, into permanent supportive housing or long-term care facility
- b. seek to have any long-term shelter programs with characteristics of a long-term care home designated as such, with ongoing and sustainable funding requested from the Province to operate the facility as a long-term care home specializing in providing appropriate primary health care, harm reduction, overdose prevention and mental health case management services for people experiencing homelessness.

4. City Council request the General Manager, Shelter, Support & Housing Administration to ensure all eligible shelter clients are added to the City's centralized social housing waiting list system and are designated priority status applicants for faster access to social housing and rent geared-to-income assistance.

5. City Council request the General Manager, Shelter, Support & Housing Administration, to:

- a. review whether it would be more effective to centralize responsibility for case management of clients that move frequently within the shelter system to support continuity of approach or care and improve outcomes
- b. clarify in the Toronto Shelter Standards and shelter provider operating agreements the City's minimum expectations related to housing, case management and other support services to be provided to shelter clients who move frequently from shelter to shelter or only use respite and/or extreme weather programs, to ensure consistency, quality and completeness of case management activities in alignment with a Housing First approach.

6. City Council request the General Manager, Shelter, Support & Housing Administration, to:

- a. establish expectations, targets and outcomes for post-housing follow-up support services
- b. clarify in the Toronto Shelter Standards and shelter and homelessness service provider operating agreements who is responsible for post-housing follow-up and the City's minimum expectations related to the nature, extent, and timing of follow-up activities, as well as documentation requirements of post-housing follow-up services within the City's homelessness and housing information system to support continuity of approach or care and improve outcomes
- c. determine the funding requirements and sources to adequately support shelter and homelessness service providers to deliver the necessary post-housing follow-up services.

7. City Council request the General Manager, Shelter, Support & Housing Administration, to implement robust program accountability standards and monitoring of the quality, efficiency and effectiveness of case management by shelter providers. Such monitoring to include:

- a. reviewing of case files to assess whether shelter providers adequately comply with the Toronto Shelter Standards service requirements for case management
- b. benchmarking of actual staff to client service ratio for like programs, based on the level of support and intensity of case management required according to a common assessment of needs
- c. assessing outcomes achieved by shelter providers.

8. City Council request the General Manager, Shelter, Support & Housing Administration, in consultation with key stakeholders including shelter providers, to:

- a. continue to develop and implement consistent criteria or method of assessment tool and approaches, which can be used by all shelter staff to determine client needs and prioritize supports and service delivery. Where all shelter providers will be required to use the Service Triage, Assessment, and Referral Support (STARS) common assessment tool, SSHA to develop and implement engagement and change management plans to support effective adoption of the tool
- b. review and update the Toronto Shelter Standards and shelter provider operating agreements, in order to clarify expectations related to the intensity of case management (level, nature, and extent) to be provided to each client by shelter staff to support better outcomes for clients and better align with a Housing First approach based on the common assessment criteria

c. define expected outcomes from case planning, taking into consideration of needs and limitations of specific client groups (e.g. chronic, seniors, families, youth, transient, etc.)

d. develop targets and measures against which to assess outcomes based on the different needs and limitations of specific client groups (e.g. chronic, seniors, families, youth, transient, etc.), taking into consideration the assessment of client vulnerability and necessary intensity of case management

e. benchmark performance and outcomes across programs and shelter providers.

9. City Council request the General Manager, Shelter, Support & Housing Administration, to continue to define, implement, track, and improve the quality and reliability of key data points within the City's homelessness and housing information system, and analyze such data to improve performance monitoring, evaluate program outcomes at a program- and system-wide level, and publicly report on results. Such data to also be used to make informed decisions on how to better support homelessness service delivery including, but not limited to, prioritization of funding, staffing and resourcing, as well as priorities for developing and implementing targeted approaches to improve outcomes.

10. City Council request the General Manager, Shelter, Support & Housing Administration, to review the City's homelessness and housing information system to:

a. expedite the introduction of necessary operational, policy, and technical enhancements in the information system to enable all City-funded shelter providers to more effectively provide collaborative case management and seamless supports to their clients, whether the shelter provider uses the City's information system or not

b. determine whether the system can continue to effectively meet the Division's requirements for data-informed decision-making regarding homelessness and housing services and for developing and implementing data-informed and targeted approaches for improving outcomes for specific client groups experiencing chronic homelessness.

11. City Council request the General Manager, Shelter, Support & Housing Administration, in consultation with the City Solicitor, and with guidance from the Information and Privacy Commissioner of Ontario, to:

a. review how information collected for people experiencing homelessness, with their consent, can be shared by the City's shelter and homelessness service providers to support continuity of approach or care from intake, through case management at any shelter, and post-housing follow-up while housed

b. develop a common consent to be used by all the City's shelter and homelessness service providers to enable sharing of information for the common purpose of providing homelessness and housing services including the

appropriate information relevant to providing supports for mental and physical health conditions and to helping shelter clients navigate the health system

c. review how to share common information needed or used to provide homelessness and housing services to people experiencing homelessness and information needed or used to provide other services addressed through the Human Services Integration initiative, so that this information only needs to be collected once, resulting in a better experience and greater efficiency in providing service for the client.

12. City Council request the General Manager, Shelter, Support & Housing Administration, in consultation with the Executive Director, Housing Secretariat, to:

a. continue to look for ways to accelerate the "pivot to housing" and increase the stock of affordable permanent housing options

b. work with shelter providers to develop service plans including housing plans, and financial plans that help to prioritize people experiencing chronic homelessness for permanent housing opportunities that arise from the "pivot to housing"

c. complete a detailed analysis of cost savings from the "pivot to housing" and how funding from efficiencies and cost avoidance can be best redirected towards providing more wraparound supports which help people to be more successful at staying in permanent housing.

FINANCIAL IMPACT

The implementation of recommendations in this report will likely result in improved operating efficiency and more optimal use of limited funding for the City's homelessness and housing solutions. The precise extent of any resources required or the extent to which funds can be redirected to provide more supports and permanent housing solutions is not determinable at this time. This report recommends a detailed analysis of how any funding from efficiencies and cost avoidance can be best redirected towards providing better support in alignment with Housing First, provide enhanced wraparound supports and increase permanent housing solutions.

DECISION HISTORY

The Auditor General's recent Annual Work Plans have included several audits of different City housing programs along the housing continuum.

Figure 1: Housing Continuum



Past audits have included:

- Moving Forward Together: Opportunities to Address Broader City Priorities in Toronto Community Housing Corporation Revitalizations
[Agenda Item History - 2019.AU2.1 \(toronto.ca\)](#)
- Opening Doors to Stable Housing: An Effective Waiting List and Reduced Vacancy Rates Will Help More People Access Housing
[Agenda Item History - 2019.AU3.14 \(toronto.ca\)](#)
- Safeguarding Rent-Geared-to-Income Assistance: Ensuring Only Eligible People Benefit
[Agenda Item History - 2019.AU4.5 \(toronto.ca\)](#)
- Strengthening Accountability and Outcomes for Affordable Housing: Understanding the Impact of the Affordable Home Ownership Program
[Agenda Item History - 2020.AU6.3 \(toronto.ca\)](#)

The Auditor General's Annual Work Plan included an operational review of the Shelter, Support and Housing Administration Division. While we initiated our audit in early 2020, the audit was paused several times in recognition of the significant impacts of the COVID-19 on emergency shelter operations during the different waves of the pandemic. The Auditor General's Work Plan can be found at:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2021.AU10.3>

COMMENTS

A high-level summary of the key audit findings is provided in the two-page Audit at-a-Glance.

The attached audit report presents the detailed results of the Auditor General's report Part 1 of the Audit of Emergency Shelters. The report includes 12 recommendations together with management's response.

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SIGNATURE

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ATTACHMENTS

Attachment 1: Part 1 of the Audit of Emergency Shelters: A Focus on Case Management