



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

20
23

Audit of the Department of Family and Support Services Outreach to Encampments of People Experiencing Homelessness

August 22, 2023

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Acronyms

AME	Accelerated Moving Event
CARES Act	Coronavirus Aid, Relief, and Economic Security Act
CDPH	Chicago Department of Public Health
CPD	Chicago Police Department
DFSS	Department of Family and Support Services
DSS	Department of Streets and Sanitation
EHI	Expedited Housing Initiative
HMIS	Homeless Management Information System
HOP	Homeless Outreach and Prevention
HUD	U.S. Department of Housing and Urban Development
MCC	Municipal Code of Chicago
OIG	Office of Inspector General

Audit of DFSS Outreach to Encampments of People Experiencing Homelessness

CHICAGO OFFICE OF INSPECTOR GENERAL



"Encampment Homelessness" is one subset of the larger homeless population.

Off-Street Cleaning

The City's Off-Street Cleaning Policy strives for balance between health and safety of public way and needs and rights of citizens using public property.



OIG Audit: DFSS follows City Policy for Off-Street Cleaning



- Encampment residents notified
- Potentially abandoned items stickered
- No permanent removal of residents

Accelerated Moving Events

AMEs enable people experiencing homelessness to complete all the housing approval steps in one day



224 of 238 encampment residents who attended an AME* were placed in housing

94%

- 187 were still housed as of 10/3/22
- 46.5 days was the average length of time to move-in, following their AME

*Between 11/2020 and 5/2022

AME	Accelerated Moving Event
DFSS	Department of Family and Support Services
HUD	U.S. Department of Housing and Urban Development
OIG	Office of Inspector General

I | Executive Summary

The Office of Inspector General (OIG) conducted an audit of the Department of Family and Support Services (DFSS or “the Department”) outreach to encampments of people experiencing homelessness. The objectives of the audit were to determine whether DFSS,

1. coordinates and plans its Accelerated Moving Events (AMEs) and encampment cleanings with partner agencies to help protect the rights of encampment residents;
2. ensures that encampment residents receive notice of encampment cleanings in accordance with the City’s Policy and Procedures Governing Off-Street Cleaning; and
3. ensures encampment residents secure and retain housing through AMEs.

A | Conclusion

DFSS has found success in rapidly housing encampment residents using a “housing first” approach via the AME program.¹ The AME program—designed to streamline the process of moving people experiencing homelessness into housing—provides stable housing for many encampment residents. The program can serve as a potential model for other jurisdictions working with their own encampment populations. Regarding people experiencing homelessness who remain in encampments, OIG concludes that the City performs outreach in an appropriate and productive manner. DFSS follows the City’s Policy and Procedures Governing Off-Street Cleaning. By doing so, it helps protect the property of people experiencing homelessness while leaving cleaner, safer environments for these residents and users of the public way. Importantly, DFSS does not carry out forced, permanent removal of encampment residents from public spaces. OIG’s only recommendation is that the Department update its Homeless Services FAQs sheet to provide Council members with accurate information about the policy, reducing confusion and clarifying how the policy protects the rights of people experiencing homelessness.

B | Findings

OIG found that DFSS does not permanently displace encampment residents from public spaces. The City makes reasonable efforts to protect encampment residents’ portable personal possessions by following the City’s Policy and Procedures Governing Off-Street Cleaning.

In addition, OIG found that DFSS carries out AMEs that largely ensure participating encampment residents secure and retain housing. OIG analyzed the outcomes of encampment residents who attended an AME between November 2020 and May 2022, and found that 224 encampment residents, or 94.1% of participants, entered stable housing. Of these, 187, or 78.6% of all participants, remained housed as of October 3, 2022, the time of OIG’s analysis.

¹ Per the U.S. Department of Housing and Urban Development (HUD), “Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements.” HUD, “Housing First in Permanent Supportive Housing Brief,” July 2014, accessed June 26, 2023, <https://www.hudexchange.info/resource/3892/housing-first-in-permanent-supportive-housing-brief/>.

C | Recommendations

OIG recommends that DFSS consider updating its Homeless Services FAQ sheet that it shares with City Council members to include the City's Policy and Procedures Governing Off-Street Cleaning. It should also communicate with Council members regarding that policy and how it protects the rights of people experiencing homelessness.

D | DFSS Response

In response to OIG's audit findings and recommendations, DFSS stated that it will include the City's Policies and Procedures Governing Off-Street Cleaning as an attachment to the FAQ sheet it provides to City Council, as well as include information on these policies and procedures in its annual report to City Council on homelessness and housing.

The specific recommendations related to each finding, and DFSS' response, are described in the "Findings and Recommendations" section of this report.

II | Background

Homelessness is a complex social issue that affects an entire community. Everyone, housed or unhoused, contends with the impacts of homelessness to varying degrees. Homelessness poses immediate risks to health and safety, threatens individual dignity and human rights, and impacts public services and local economies.



Encampment of people experiencing homelessness in Chicago. Source: DSS photograph.

DFSS is responsible for the City of Chicago's efforts to combat homelessness.² DFSS works with City departments, other governmental and sister agencies, and homelessness service providers to prevent and end homelessness and provide crisis intervention services.

² The Municipal Code of Chicago (MCC) § [2-50-040](#) assigns DFSS the powers and duties, among others, to "provide human services, including...crisis intervention services," and "to plan, initiate, supervise and coordinate programs and projects that help to prevent and end homelessness." Section 2-50-040 also assigns DFSS the power and duty "to enlist and encourage the cooperation of all public and voluntary agencies...to facilitate the rendering of voluntary aid and assistance in programs directed toward solving the social and economic problems confronting residents."

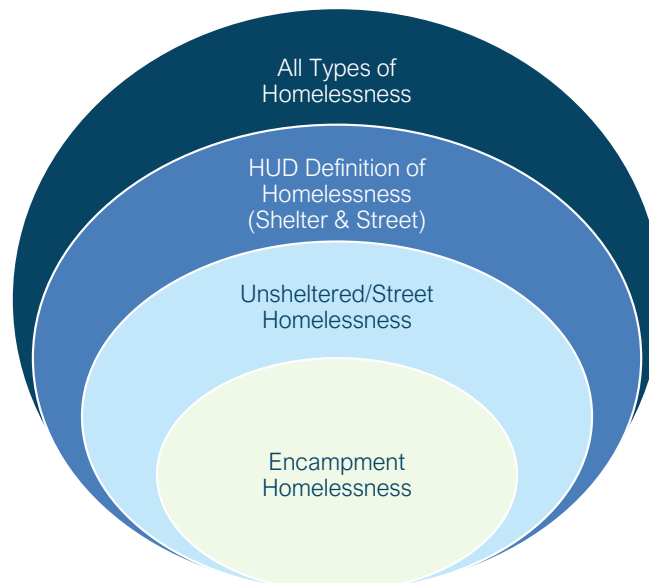
A | Defining Homelessness

The U.S. Department of Housing and Urban Development (HUD) uses the term “homeless” to describe an “individual or family who lacks a fixed, regular, and adequate nighttime residence.”³ This definition includes both those staying in places not meant for human habitation and those staying in temporary shelters. Of that population, those staying in a place not meant for human habitation—for example, a bus stop shelter or under a viaduct—are classified as experiencing unsheltered homelessness, also known as street homelessness.

Some people experiencing unsheltered homelessness join together on sidewalks, under viaducts, or in parks, creating encampments, sometimes referred to as “tent cities.” People living in encampments, then, are a subset of the population of people experiencing unsheltered homelessness and are sometimes and herein called encampment residents.

Some organizations conceive of homelessness in more expansive ways. For example, the Chicago Coalition for the Homeless includes people experiencing sheltered and unsheltered homelessness as well as people who are “doubled up,” or temporarily staying with others such as a family member or friend.⁴ Each of these definitions provides a different way to conceptualize homelessness, ranging from taking an all-inclusive view to focusing on a specific kind of homeless experience. Figure 1 illustrates definitional categories of homelessness.

Figure 1: “Encampment Homelessness” Defines a Subset of the Larger Homeless Population



Source: OIG visualization.

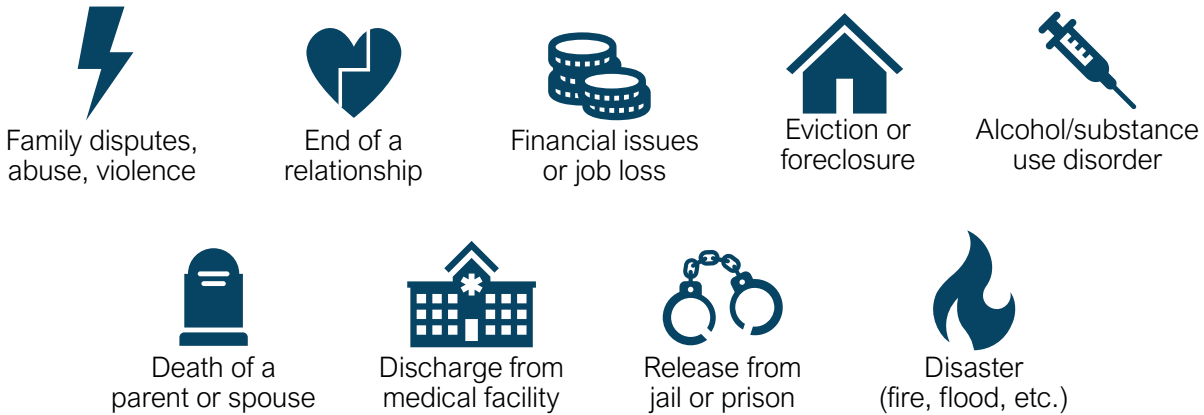
There are several specific experiences or incidents that can trigger homelessness. Figure 2 lists situations that Chicagoans experiencing homelessness identified as contributing factors in their

³ U.S. Department of Housing and Urban Development, “Criteria and Recordkeeping Requirements for Definition of Homelessness,” January 2012, accessed February 2, 2023, https://files.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf.

⁴ Chicago Coalition for the Homeless, “Illinois State of Homelessness Report,” September 2022, accessed February 7, 2023, <https://s6624.pcdn.co/wp-content/uploads/2022/09/IL-State-of-Homelessness-2022-FINAL.pdf>.

housing loss in their responses to a HUD survey. The most common causes, cited by 38.8% of respondents, were family disputes, abuse or violence in the home, and divorce or other relationship-ending events.⁵

Figure 2: Chicagoans Experience Homelessness for a Variety of Reasons



Source: OIG visualization of DFSS 2022 Point-in-Time Count & Survey Report.⁶

Homelessness service providers that work with Chicago’s unsheltered population also described to OIG the loss of a temporary living arrangement, inability to work, and mental illness as contributing factors.

B | Estimating the Population of People Experiencing Homelessness

To estimate the number of people experiencing homelessness in the United States, HUD requires communities to conduct a Point-in-Time Count of all people experiencing sheltered and unsheltered homelessness. This count occurs each year on a single night in January.⁷ The 2023 Chicago Point-in-Time Count estimated a total of 6,139 people experiencing homelessness within the city.⁸ Individuals experiencing unsheltered homelessness made up 16.1% of this total. Figure 3 summarizes the last six years of Chicago’s Point-in-Time Count estimates.

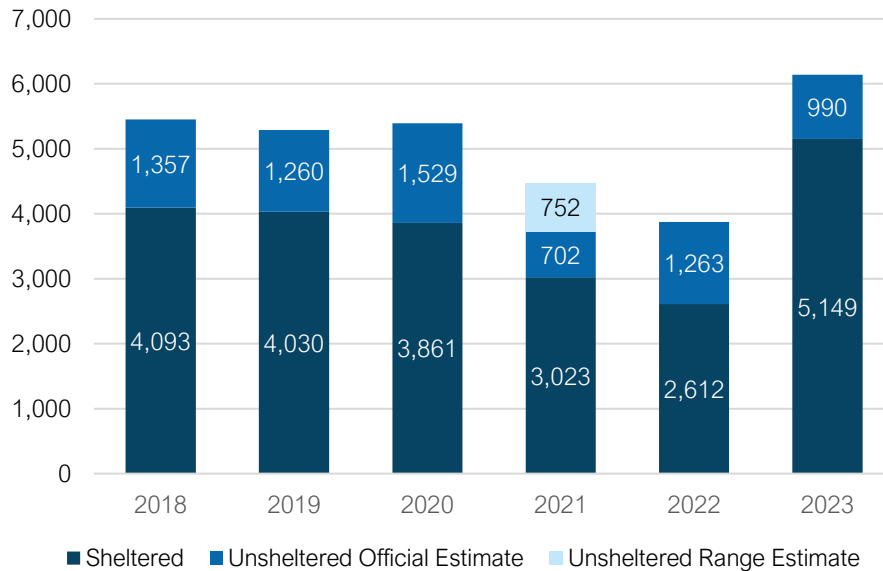
⁵ City of Chicago Department of Family and Support Services, “2022 Point-in-Time Count & Survey Report of People Experiencing Homelessness,” 2022, p. 9, accessed January 18, 2023, https://www.chicago.gov/content/dam/city/depts/fss/supp_info/Homeless/2022PITCOUNT/2022%20PIT%20Report_Final.pdf

⁶ Department of Family and Support Services, “2022 Point-in-Time Count,” p. 9.

⁷ The Point-in-Time Count is one way to measure homelessness. It does not capture all individuals who may experience homelessness in a particular year, but it does provide information for homelessness service providers and funders at the local, state, and federal level.

⁸ By contrast, the Chicago Coalition for the Homeless calculates homelessness by including all people who are “doubled up.” According to its most recent estimate, 65,611 people were experiencing homelessness in Chicago in 2020. Chicago Coalition for the Homeless, “Illinois State of Homelessness Report,” p. 5.

Figure 3: Point-in-Time Counts Estimate that the Total Population of People Experiencing Homelessness in Chicago Has Recently Increased⁹



Source: OIG visualization of DFSS 2022 Point-in-Time Count & Survey Report and 2023 Point-in-Time Count Snapshot.¹⁰

C | Unsheltered Homelessness Sites and Encampments

DFSS monitors known locations throughout the city where people experiencing unsheltered homelessness stay. Some of these sites have just one person. Others have various numbers of people living together and may be referred to as encampments.

Homelessness sites in Chicago move and change in size. They also can become inactive or “cleared” when all residents are placed in shelters or housing. DFSS continues to monitor inactive sites in case they become active again.

The number of active homelessness sites in Chicago has decreased since 2022. In February 2022, DFSS reported 90 such sites. By January 2023, DFSS reported 67 active homelessness sites throughout the city. Of those, 20 had 7 or more individuals living on site.

Encampments remain a visible part of communities in all parts of the city. The largest, most visible sites are located in the multilevel streets of the downtown Loop and under various viaducts of DuSable Lake Shore Drive and the Kennedy and Dan Ryan Expressways.

There are several reasons people experiencing street homelessness might avoid shelters, choosing instead to congregate in encampments. Some encampment residents seek safety and community.

⁹ In response to the risks from COVID-19, rather than conducting a Citywide count of people experiencing homelessness in one night, in 2021 DFSS conducted a sampling approach over the course of three days. The range reported for 2021 (702 to 1,457) reflects that altered methodology.

¹⁰ City of Chicago Department of Family and Support Services, “2023 Snapshot of Homelessness in Chicago,” 2023, accessed August 11, 2023, https://www.chicago.gov/content/dam/city/depts/fss/supp_info/Homeless/2023PITCOUNT/2023%20PIT%20Count%20one%20pager%20FINAL.pdf; Department of Family and Support Services, “2022 Point-in-Time Count,” p. 5.

Others avoid emergency shelters because they dislike or cannot follow shelter policies and prefer the relative freedom of street homelessness. For example, shelters may forbid drug or alcohol use, require separation by gender, enforce curfews, or prohibit pets. Shelters also sometimes run out of beds.

D | Responding to Encampments

Cities respond to encampments of people experiencing homelessness in a range of ways, and no single approach has eliminated unsheltered homelessness. Nevertheless, there are a few generally accepted practices, including,

- planning and coordinating among service providers;
- notifying encampment residents in advance of encampment cleanings and the end of any services provided;
- treating encampment residents with dignity during all aspects of outreach; and
- assessing outcomes and costs of outreach to inform future efforts.

The Illinois Bill of Rights for the Homeless Act states that people experiencing homelessness “shall be granted the same rights and privileges as any other citizen of this State,” including “the right to use and move freely in public spaces[.]”¹¹ The City’s policy—discussed further on page 12—states that the City will not force individuals experiencing homelessness to move from their locations unless they are “trespassing or obstructing the public way.”¹² Residents may be temporarily moved from public property for cleanings, construction and infrastructure repairs, or may be temporarily or permanently moved for security reasons. For example, the Chicago Department of Aviation has determined that “it is trespassing to be at O’Hare or Midway without any airport business,” and, therefore, people experiencing homelessness might be permanently moved.¹³ Other public agencies and private property owners have different policies.

The City’s encampment response includes outreach to residents and referrals to supportive services, shelter, and housing. DFSS’ Homeless Outreach and Prevention (HOP) Team carries out this work. The HOP Team engages with people experiencing homelessness and connects them with services that help secure shelter or housing.

DFSS is the lead organization for the Mayor’s Task Force to End Homelessness. This group includes numerous City departments and sister agencies, each with various levels of involvement. For example, the Chicago Department of Public Health (CDPH) contracts with a physician who offers health care to encampment residents. DFSS also engages a network of service providers, contracting directly with some, to offer services to encampment residents. These services include mental health support, substance abuse treatment, meals, clothing, hygiene items, emergency shelter, transportation, and other services.

¹¹ [775 ILCS 45/1 through 45/15](#).

¹² City of Chicago Department of Family and Support Services, “City Policy and Procedures Governing Off-Street Cleaning,” January 9, 2015, accessed June 9, 2023, https://www.chicago.gov/city/en/depts/fss/supp_info/city-policy-and-procedures-governing-off-street-cleaning-pursua0.html. See Appendix A.

¹³ Perlman, Marissa. “Mayor Lightfoot Says Homeless People Can’t Be Sleeping at O’Hare; Advocates Wonder Where They’ll Go,” CBS 2 Chicago, February 18, 2023, accessed February 18, 2023 <https://www.cbsnews.com/chicago/news/mayor-lightfoot-homeless-people-ohare/>. The CDA works with DFSS, CPD, and the Chicago Fire Department to secure the airport for passengers and employees.

HOP team workers and service provider staff follow a schedule to ensure they visit encampments in all areas of the city, typically weekly. DFSS also responds to referrals from aldermanic offices, other City departments, and concerned members of the public. In addition to regular outreach, DFSS engages in multi-day outreach events for larger encampments. During these engagements, DFSS deploys a coordinated team of service providers and City departments with the goal of finding shelter opportunities for residents.

DFSS works within a larger network of homelessness services providers known as a Continuum of Care. These HUD-mandated planning groups coordinate homelessness services for specific geographic areas. Chicago's Continuum of Care is comprised of more than 100 organizations and individuals. All members of Chicago's Continuum of Care, including DFSS, share a vision, mission, and goals. HUD requires those receiving funding to report performance measures and track client data via the Homeless Management Information System (HMIS).

COVID-19 impacted DFSS' outreach efforts and led to a hiatus from its multi-day outreach events. At the start of the pandemic, DFSS focused on safety by providing education and personal protective equipment to encampment residents. Once vaccines were available, DFSS worked with CDPH to vaccinate encampment residents. As COVID-19 restrictions were lifted in 2021, DFSS began to resume regular outreach. Multi-day outreach events resumed in June 2022.

E | Accelerated Moving Events

In April 2020, responding to the COVID-19 crisis, Chicago's Continuum of Care launched the Expedited Housing Initiative (EHI). EHI sought to reduce barriers to housing by leveraging \$35 million in federal Coronavirus Aid, Relief, and Economic Security (CARES) Act funds. The program initially supported people experiencing homelessness who were at high risk for exposure to COVID-19. Over time, the program expanded to support a wider group of people experiencing homelessness. EHI works by reducing certain housing entry requirements, such as background checks, and increasing available housing stock. For example, the initiative offers guaranteed rent payments to encourage landlords to enter into leases with people transitioning from homelessness.

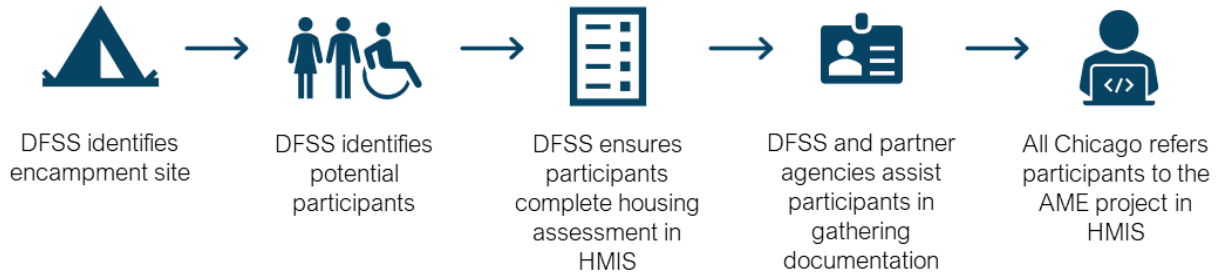
EHI included a subsidiary program, AMEs, to streamline the process of moving people experiencing homelessness into housing. In an AME, people experiencing homelessness complete all the steps required to secure housing in one day. All Chicago, a nonprofit member of the Continuum of Care, leads AMEs for people experiencing all types of homelessness. DFSS is the lead coordinator for AMEs to house encampment residents.

EHI allowed agencies to prioritize a "housing first" approach and to host AMEs.¹⁴ Accordingly, DFSS focused its encampment outreach efforts on offering AMEs and moving residents quickly into housing. All Chicago first offered AMEs in October 2020. In November 2020, DFSS and All Chicago held their first AME specifically for encampment residents. DFSS held 17 encampment AME events between November 2020 and December 2022.

¹⁴ Per HUD, "Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements." U.S. Department of Housing and Urban Development, "Housing First in Permanent Supportive Housing Brief," July 2014, accessed June 26, 2023, <https://www.hudexchange.info/resource/3892/housing-first-in-permanent-supportive-housing-brief/>.

Before an encampment AME, DFSS and All Chicago work together to prepare encampment residents for the event. Figure 4 shows the steps DFSS and All Chicago take to prepare potential participants for an upcoming AME.

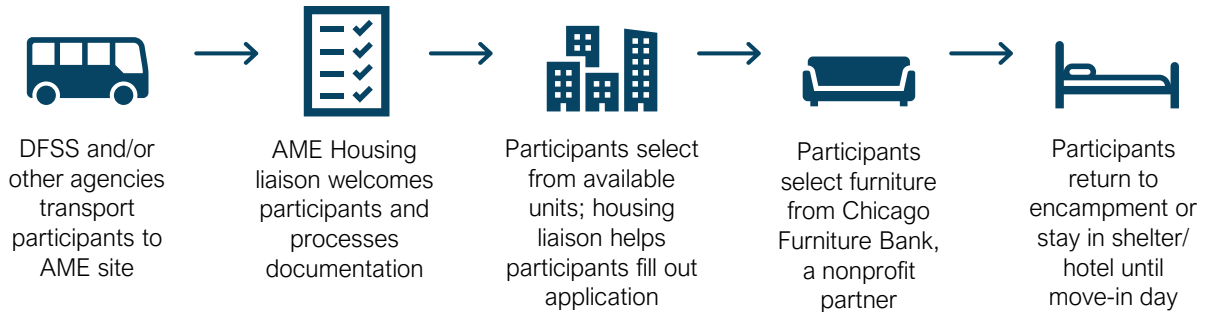
Figure 4: DFSS and All Chicago Prepare Encampment Residents to Participate in an AME



Source: OIG visualization based on information provided by All Chicago and DFSS.

On the date of an AME, DFSS and other agencies transport participating residents to a nearby facility, such as The Salvation Army, the Chicago Cultural Center, or DFSS Community Service Centers. There, DFSS, All Chicago, and other homelessness service providers coordinate to connect residents with housing, as illustrated in Figure 5. Non-encampment AMEs follow the same process but serve participants at temporary shelters and drop-in facilities.

Figure 5: DFSS and All Chicago Work with AME Participants to Secure Housing



Source: OIG visualization based on an AME observation and information provided by All Chicago and DFSS.

EHI set a goal to use AMEs to house 1,250 people experiencing homelessness in Chicago via AMEs within 12 months of the program’s initiation. As of October 31, 2022, the end of the initial two-year EHI funding period, AMEs had connected a total of 1,888 households to permanent housing. DFSS reportedly plans to continue holding AMEs in the coming year, stating that it has an additional 35 million dollars available to support the effort. The Department will have about 1,200 AME housing units for 2023.

F | Encampment Cleanings

Encampments sometimes fill with discarded items, trash, and waste, causing unhygienic conditions for residents and the public at large. This debris can also block public access to sidewalks or bike lanes. To remove trash and improve sanitation, DFSS works with the Department of Streets and

Sanitation (DSS) to schedule encampment cleanings, which DSS carries out pursuant to its powers and duties enumerated in the Municipal Code of Chicago (MCC).¹⁵



Trash and items from encampments can create unhygienic conditions and block the public way. Source: DSS photograph.

DFSS and DSS follow a monthly cleaning schedule for the largest encampment locations, attending to smaller encampments on an as-needed basis. Encampment cleanings act as a harm reduction service for residents and the communities they inhabit, removing trash and alleviating unhygienic conditions from public spaces. Advocacy groups frequently monitor cleanings to ensure that the City is respecting the rights of unsheltered individuals.

¹⁵ DSS is responsible for “the cleaning of public ways and the removal of garbage, refuse and waste” and “the removal of any article or thing which may encumber or obstruct any public way.” City of Chicago, MCC § [2-100-030](#). “Public Way” is defined as “any sidewalk, street, alley, highway, or other public thoroughfare.” City of Chicago, MCC § [1-4-090](#).



Encampment cleanings improve sanitation and help to maintain the public way. Source: DSS photograph.

The City's Policy and Procedures Governing Off-Street Cleanings, an expansion upon a document commonly known as the "Bryant Agreement," explains the City's process for encampment cleanings.¹⁶ The January 2015 Bryant Agreement settled a proposed class action lawsuit against the City related to encampment cleaning efforts.¹⁷ Pursuant to the Bryant Agreement, the City agreed to outline new policies and procedures for off-street cleaning. Although the Bryant Agreement expired after five years and applied only to the Lower Wacker Drive Area, Chicago has since adopted its language as the citywide policy, in the form of the Policy and Procedures Governing Off-Street Cleanings.¹⁸ It outlines the steps DFSS, DSS, and the Chicago Police Department (CPD) take before and during encampment cleanings. The policy aims to allow the City to maintain the public way and protect public health and safety while also protecting the rights of people accessing public areas, including those experiencing homelessness. The policy clarifies that individuals experiencing homelessness may only have "portable personal possessions" with them. Specifically, personal possessions protected by the policy include, "a sleeping bag or bedroll, not more than two coats, not more than two pairs of shoes or boots, not more than five blankets, and not more than three bags or suitcases, and such contents as may be contained in said bags or suitcases." The policy also protects "personal documents (such as personal identification, birth

¹⁶ City of Chicago Department of Family and Support Services, "City Policy and Procedures Governing Off-Street Cleaning," January 9, 2015, accessed April 17, 2023, https://www.chicago.gov/city/en/depts/fss/supp_info/city-policy-and-procedures-governing-off-street-cleaning-pursua0.html.

¹⁷ See generally Mark Flessner, City of Chicago Department of Law Memorandum, "Re: Request for Information from Annual Appropriation Committee Hearing ID#: 31-20 Suits," https://www.chicago.gov/content/dam/city/depts/obm/supp_info/2020Budget/DeptResponses/31-LawResponses.pdf, PDF pp. 117-138 (Nov. 13, 2019) ("DOL Memo re Suits"). In December 2013, attorneys representing a group of individuals experiencing homelessness sent the City a proposed class action complaint alleging that multiple City actors violated the United States Constitution by seizing and destroying their personal property. See DOL Memo re Suits at PDF p. 118. On January 9, 2015, the individuals and the City executed the Bryant Agreement, thereby settling the proposed class action suit before it was filed. See DOL Memo re Suits at PDF pp. 118, 127.

¹⁸ "Lower Wacker Drive Area" is defined as "the area bounded on the north by the Chicago River, the south by Monroe Street, the west by the Chicago River's south branch, and the east by Lake Michigan."

certificates, legal documents, personal or family photographs, and bills), personal medication, eyeglasses, money, and jewelry.” The Policy and Procedures Governing Off-Street Cleanings is a City of Chicago initiative and does not bind sister agencies of the City or state, such as the Chicago Transit Authority or the Illinois Department of Transportation.

III | Objectives, Scope, and Methodology

A | Objectives

The objectives of the audit were to determine whether DFSS,

- coordinates and plans its AMEs and encampment cleanings with partner agencies to protect the rights of encampment residents;
- ensures that encampment residents receive notice of encampment cleanings in accordance with the Policy and Procedures Governing Off-Street Cleaning; and
- ensures encampment residents secure and retain housing through AMEs.

B | Scope

OIG reviewed DFSS and its partner departments' adherence to the City's Policy and Procedures Governing Off-Street Cleaning. OIG also reviewed the AME program and assessed the efficacy of DFSS-led AMEs held between November 1, 2020, and May 31, 2022. OIG did not examine interactions with encampments on private property, because they are outside of DFSS' purview.

C | Methodology

For all objectives, OIG interviewed encampment residents and AME participants, City Council members, management and staff from homelessness services agencies and advocacy groups, and management and staff of DFSS, DSS, and CPD.

To assess DFSS' coordination with partner agencies for AMEs and encampment cleanings, OIG reviewed cleaning schedules and outreach program documentation. OIG also observed HOP team outreach, partner agency outreach, an AME, and an encampment cleaning.

To determine whether DFSS ensures encampment residents receive notice of encampment cleanings, OIG made both announced and unannounced visits to encampment sites to observe posted notices. OIG reviewed DSS' records of postings for all encampment sites with a scheduled cleaning for the month of May 2022.

To determine whether DFSS permanently removed encampment residents from public spaces, OIG interviewed encampment residents, staff from homelessness services agencies and advocacy groups, City staff, and City Council members. OIG also reviewed media reporting and observed cleanings. While it remains possible that individuals experiencing homelessness may have been displaced by public actors during the scope of this audit, OIG found no evidence of DFSS or DSS permanently removing encampment residents from public spaces.

To determine whether encampment residents secure, remain in, and retain housing via AMEs, OIG analyzed HMIS records of all encampment residents who attended a DFSS-led AME between November 1, 2020, and May 31, 2022. Specifically, OIG calculated how many encampment residents secured housing via those AMEs, how long they stayed in that housing, and their housing status as of October 3, 2022 (the date on which the data was collected). OIG designed its data request to avoid unnecessarily collecting personally identifiable information or potential health

information for encampment residents. Further, OIG protected health records in accordance with applicable laws and rules, including the Health Insurance Portability and Accountability Act.¹⁹

D | Standards

OIG conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that OIG 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. OIG believes that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

E | Authority and Role

The authority to perform this audit is established in the City of Chicago Municipal Code § 2-56-030 which states that OIG has the power and duty to review the programs of City government in order to identify any inefficiencies, waste, and potential for misconduct, and to promote economy, efficiency, effectiveness, and integrity in the administration of City programs and operations.

The role of OIG is to review City operations and make recommendations for improvement.

City management is responsible for establishing and maintaining processes to ensure that City programs operate economically, efficiently, effectively, and with integrity.

¹⁹ Health Insurance Portability and Accountability Act of 1996, Pub. L. No. 104-191, 110 Stat. 1936; 45 C.F.R. § 160; 45 C.F.R. § 162; 45 C.F.R. § 164.

IV | Findings and Recommendations

Finding #1: DFSS does not permanently displace encampment residents from public spaces, and the City makes reasonable efforts to protect encampment residents' portable personal possessions.

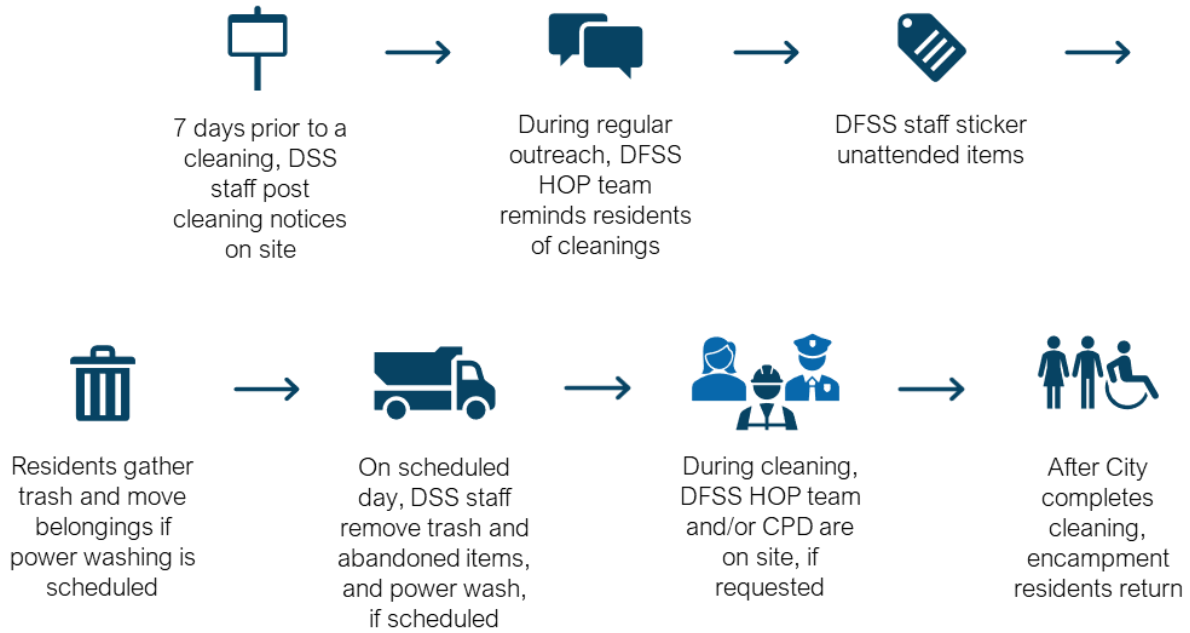
OIG found no evidence that DFSS permanently removes encampment residents from public spaces.²⁰ The City sometimes temporarily moves encampment residents for cleanings, construction, or emergencies, but they are permitted to return.

DFSS and DSS follow the City's Policy and Procedures Governing Off-Street Cleaning. The policy refers to DFSS, DSS, and CPD collectively as "the City," and states that DFSS will lead contact with people experiencing homelessness. The policy requires that the City post onsite notice of upcoming cleanings at encampment locations seven days in advance. It also requires that unattended items, or those not protected by the policy, be stickered with a notice that they may be discarded if not claimed or removed.

DFSS maintains a monthly schedule for cleaning encampments of which it is aware. Using that schedule, DSS posts notices seven days prior to cleanings and carries them out on the scheduled day. DFSS also coordinates cleanings with other agencies, such as the Chicago Park District and CPD, as needed. During its regular outreach, DFSS' HOP Team reminds encampment residents of upcoming cleanings. The Team also places stickers on unattended items, providing notice that they may be discarded if they are not claimed or removed from the public way. This process is depicted in Figure 6. Although CPD does not routinely participate in encampment cleanings, it attends if DFSS requests its presence due to safety concerns.

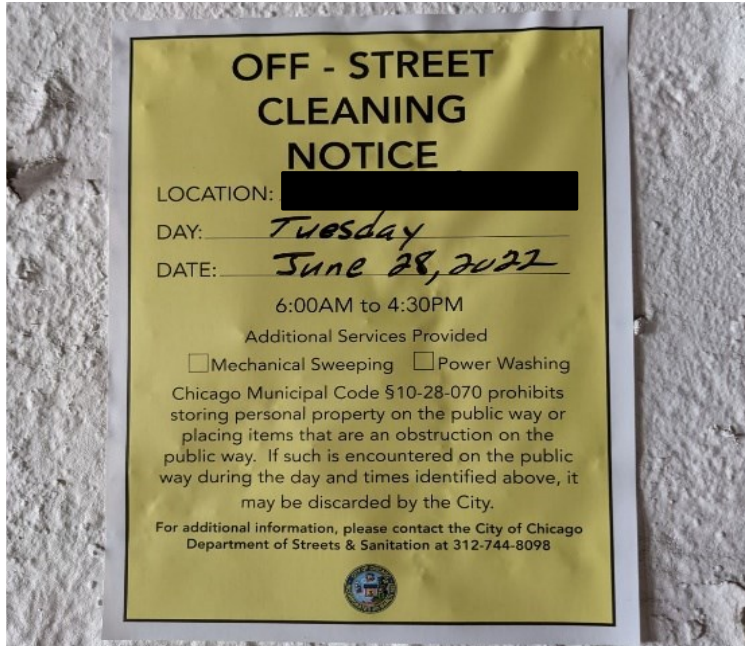
²⁰ See the Methodology section above for further information on how OIG pursued this question in its audit fieldwork.

Figure 6: The City Provides Notice to Encampment Residents Before and During Cleanings so They Can Secure Their Belongings



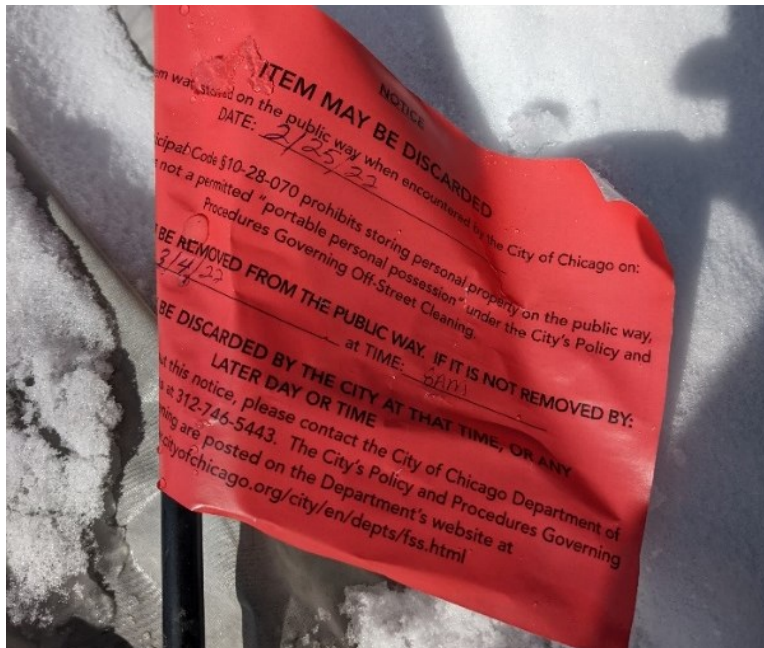
Source: OIG visualization of notification processes based on information provided by DSS and DFSS.

OIG reviewed DSS' documentation of posted notices for 16 encampment cleanings scheduled for May 2022. DSS had documented evidence of posted notice 7 days in advance for all 15 active encampment sites. The remaining site no longer had residents and thus required no notice. Additionally, OIG held five unannounced site visits to encampments with scheduled cleanings in June 2022. Four of the five sites were active and had posted notices seven days prior to the cleaning. The remaining site was inactive and thus required no notice.



DSS posts cleaning notices seven days prior to cleanings. Source: OIG photograph, location redacted for privacy reasons.

OIG also observed an encampment cleaning in March 2022. At that site, OIG confirmed posted notices, as well as stickered items.



DFSS puts stickers on potentially abandoned items prior to cleanings. Source: OIG photograph.

Providing encampment residents notice of upcoming cleanings increases the likelihood that their property will be protected. OIG spoke with residents at three encampment sites on the West Side of Chicago. Residents stated they were familiar with the City's cleaning procedures but noted that new

arrivals to an encampment may not be. Residents expressed little concern that their property would be discarded, but they stated it was best to be on-site during cleanings.

Long-term residents know the cleaning schedule well.

One encampment resident said City cleanings are regular, “like weekly or every other week.”

Multiple encampment residents reported it was helpful to be on site during cleanings to point out items they want to keep.

Encampment residents may also ask someone else in the encampment to watch items they want to protect.

Encampment residents reported receiving numerous services from both the City and other agencies at encampments, often every day.

“They’re always bringing us food, clothing, toothbrushes.”

“So many people just want to help us.”

Source: OIG interviews with encampment residents.

Even with posted cleaning notices and stickers, some encampment residents and members of the public remain concerned that personal property might be discarded. News coverage suggests confusion among advocates, the media, and the public about the City’s encampment cleaning protocols.²¹ Cleaning notices have been viewed as attempts to permanently displace encampment residents. Similarly, stickers have been misunderstood as threats that an item will be discarded regardless of the circumstances. OIG’s fieldwork in this audit found no evidence that these concerns are warranted.

DFSS shares its cleaning protocols during annual budget hearings and when individual City Council members contact DFSS to request assistance with unsheltered individuals. When it receives such a request, the Department provides a Homeless Services FAQs sheet that reminds the Council member that encampments are not illegal. The sheet, however, does not reference the City Policy and Procedures Governing Off-Street Cleaning.

²¹ Jordan Anderson, “New Winterized Tents Near Fulton Market Bring Shelter Security for the Unhoused, but Spark Questions of Permanency,” Chicago Tribune, October 27, 2022, accessed June 23, 2023, <https://www.chicagotribune.com/news/breaking/ct-winter-tents-homeless-fulton-market-20221027-moz5j6y3sveqxbwsrgg7ct2vza-story.html>;

Mack Liederman, “City May Tear Down Warm Tents Man Passed Out to Chicagoans Who Are Homeless,” Block Club Chicago, November 2, 2022, accessed June 23, 2023, <https://blockclubchicago.org/2022/11/02/city-may-tear-down-warm-tents-man-passed-out-to-chicagoans-who-are-homeless/>;

Jordan Anderson, “City Officials Say Fulton Market Tents Do Not Need to be Removed for Street Cleaning Thursday,” Chicago Tribune, November 2, 2022, accessed June 23, 2023, <https://www.chicagotribune.com/news/breaking/ct-fulton-market-tents-no-removal-for-cleaning-20221103-uzut4mow55exlquey2cxbsibe-story.html>;

Michael Loria, “West Loop Homeless on Edge as City Threatens to Discard Donated Tents,” Chicago Sun-Times, November 3, 2022, accessed June 23, 2023, <https://chicago.suntimes.com/news/2022/11/3/23439015/west-loop-homeless-orange-tents-chicago-department-streets-sanitation-clinton-robledo>.

| Recommendations

1. DFSS should consider updating the Homeless Services FAQs sheet it shares with Council members to include the City Policy and Procedures Governing Off-Street Cleaning. Additionally, it should communicate with Council members regarding that policy and how it protects the rights of people experiencing homelessness and governs the City's encampment response.

| Management Response

DFSS provided a direct response to this particular recommendation, which is provided below. DFSS also provided a general response to the audit, which is included as Appendix B.

1. *“DFSS will include the Policies and Procedures Governing Off-Street Cleaning as an attachment to the FAQ sheet we provide to City Council.*

“Additionally, DFSS, in coordination with the Department of Housing, is newly responsible for submitting and publishing an annual report to City Council on homelessness and housing in Chicago, including reporting on progress on implementation of national best practices for addressing encampments. DFSS will include information in this report on policies and procedures for cleaning and how this aligns with the City's encampment response.”

Finding #2: DFSS's Accelerated Moving Events largely ensure that participating encampment residents secure and retain housing.

DFSS leads AMEs that seek to house Chicago's encampment residents. At these events, DFSS conducts encampment outreach and coordinates with All Chicago to guide people to available housing. Most participating encampment residents secure and retain housing after attending an AME.

Between November 2020 and May 2022, DFSS led 14 AMEs throughout Chicago, serving 238 encampment residents.²² Of those residents, 224 (94.1%) entered housing via an AME. Encampment residents moved into housing, on average, 46.5 days after attending an AME.

As of October 3, 2022, of the 238 encampment residents who had attended an AME,

- 187, or 78.6%, remained in stable housing;²³
- 28, or 11.8%, had an unknown current housing status;²⁴
- 17, or 7.1%, were no longer housed;²⁵ and
- 6, or 2.5%, had passed away.

Figure 7 provides further detail regarding the status of the 238 encampment residents who attended an AME.

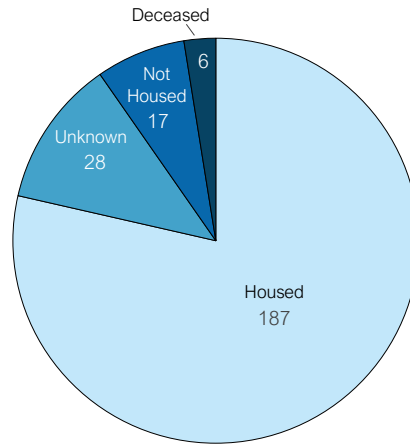
²² DFSS-led AMEs served 237 unique encampment residents, with one repeated participant, for a total of 238. Because one resident participated in the program twice, OIG's analysis counts that individual's experience twice, including their outcomes for both the first and second time they participated.

²³ For the purposes of this audit, OIG defined stable housing as housing that was secured for a specific time period via a lease or rental agreement.

²⁴ Encampment residents with an unknown status may not have completed an exit interview or may not have shared their destination when exiting the program.

²⁵ The category "not housed" includes all AME participants who left a stable housing placement to either unsheltered/street homelessness; jail, prison, or another institutional setting; or a temporary/emergency shelter.

Figure 7: Most Encampment Residents Who Attended an AME between November 2020 and May 2022 Were Still Housed as of October 3, 2022



Encampment Residents Housed as of October 3, 2022	187
Housed for fewer than 12 months and still enrolled in AME housing placement	82
Housed for more than 12 months and still enrolled in AME housing placement	33
Found alternative stable housing before 12 months of AME housing placement	40
Found alternative stable housing after 12 months of AME housing placement	22
Found alternative stable housing, but time in AME housing placement unknown	9
Placed immediately in alternative stable housing without an AME housing placement	1
Encampment Residents with Unknown Housing Status as of October 3, 2022	28
Not placed in housing via AME	13
Housed in AME housing placement for fewer than 12 months, current housing status unknown	10
Housed in AME housing placement for more than 12 months, current housing status unknown	4
Time in AME housing placement unknown, current housing status unknown	1
Encampment Residents Not Housed as of October 3, 2022	17
Exited before 12 months to temporary housing, emergency shelter, or street homelessness	6
Exited after 12 months to temporary housing, emergency shelter, or street homelessness	1
Exited at an unrecorded time to temporary housing, emergency shelter, or street homelessness	6
Exited after 12 months to jail or prison	2
Exited before 12 months to institutional housing	1
Exited after 12 months to institutional housing	1
Client Deceased	6
Housed in AME housing placement for fewer than 12 months, now deceased	4
Housed in AME housing placement for more than 12 months, now deceased	1
Died after AME but before moving into AME housing placement	1

Source: OIG analysis of data from HMIS.

OIG analyzed the results of DFSS-led AMEs for encampment residents because of their unique vulnerability and increased likelihood of facing chronic homelessness. However, the EHI program's goals are not specific to encampment residents, but address all people experiencing homelessness. DFSS and All Chicago shared a goal of housing 1,250 people experiencing homelessness within the first 12 months of offering AMEs. They also aimed for residents to remain in stable housing after the initial program support ended. Additionally, DFSS and All Chicago set a goal to reduce the average length of time it takes to house people from 80 to 30 days. All Chicago also held AMEs for people in shelters and transitional housing.

V | Conclusion

DFSS has found success in rapidly housing encampment residents using a “housing first” approach via the AME program. The AME program—designed to streamline the process of moving people experiencing homelessness into housing—provides stable housing for many encampment residents. The program can serve as a potential model for other jurisdictions working with their own encampment populations. Regarding people experiencing homelessness that remain in encampments, OIG concludes that the City performs outreach in an appropriate and productive manner. DFSS follows the City’s Policy and Procedures Governing Off-Street Cleaning. By doing so, it helps protect the property of people experiencing homelessness while leaving cleaner, safer environments for these residents and users of the public way. Importantly, DFSS does not carry out forced, permanent removal of encampment residents from public spaces. OIG’s only recommendation is that the Department update its Homeless Services FAQs sheet to provide Council members with accurate information about the policy, reducing confusion and clarifying how the policy protects the rights of people experiencing homelessness.

Appendix A | City Policy and Procedures Governing Off-Street Cleaning

City Policy and Procedures Governing Off-Street Cleaning

This policy establishes guidelines and procedures for the removal during off-street cleanings of items improperly stored by homeless persons on certain public property. The goal of this policy is to allow the City to maintain public areas in a clean and sanitary condition, protect the public health and safety, and ensure the accessibility of public areas to all. In implementing this policy, the City seeks to balance the needs and rights of all its citizens who use public property, including the homeless. At the same time, this policy does not establish any individual right to store personal possessions on the public way for any period of time, erect temporary shelters, or otherwise encroach on public property.

I. Off-Street Cleaning Procedures for the Lower Wacker Drive Area

A. General Provisions

1. The term “Lower Wacker Drive Area” means the area bounded on the north by the Chicago River, the south by Monroe Street, the west by the Chicago River’s south branch, and the east by Lake Michigan. This area includes the streets of Lower Wacker Drive, Lower Michigan Avenue, Lower South Water Street, Lower East Wacker Place, Lower Lake Street, Lower Stetson Street, and Lower Columbus Drive. The Lower Wacker Drive Area, as defined, is entirely within the city limits of Chicago, Illinois.

2. Off-street cleaning in the Lower Wacker Drive Area generally will occur weekly, on Thursday mornings between the hours of 7:00 a.m. and 10:00 a.m., subject to staff availability, weather conditions, emergencies, and any public health requirements. Additional off-street cleanings also may be scheduled by the Department of Streets and Sanitation on an as-

needed basis, subject to staff availability, weather conditions, emergencies, and any public health requirements.

3. The off-street cleanings will be conducted by the Department of Family and Support Services (“DFSS”), the Police Department, and the Department of Streets and Sanitation (collectively, “City”). DFSS personnel will lead the City’s contact with homeless persons during the cleanings, and, during the cleanings, will provide homeless persons with information regarding shelter, housing programs, and supportive services. DFSS personnel will also inform homeless individuals of this policy. Unless the homeless individuals encountered during the cleanings are trespassing or obstructing the public way, the City will not force them to move from their location.

4. Homeless persons may keep only “portable personal possessions” with them in the Lower Wacker Drive Area. “Portable personal possessions” means that each homeless person may have only the following items with him or her in the Lower Wacker Drive Area or in the other areas covered by these procedures: a sleeping bag or bedroll, not more than two coats, not more than two pairs of shoes or boots, not more than five blankets, and not more than three bags or suitcases, and such contents as may be contained in said bags or suitcases. From October through April, homeless persons also may have up to five additional blankets and one additional sleeping bag or bedroll with them in the Lower Wacker Driver Area. “Portable personal possessions” do not include, among other items, non-air mattresses, box springs, potted plants, crates, large appliance boxes, carts, gurneys, wagons, or furniture, including, but not limited to, chairs, tables, couches, and bed frames.

5. In carrying out this policy, the City will follow all applicable local, state, and federal law.

B. Notice

1. At least twenty-four (24) hours in advance of an off-street cleaning in the Lower Wacker Drive Area, the City will post English-language signs in visible and conspicuous locations where the City is aware that homeless persons congregate. These signs shall be of the same size as the City uses in its street-cleaning activities elsewhere in the City. A copy of the text of the sign to be used is attached.

2. At the time the signs are posted, the City, through DFSS personnel, will attempt to give oral notice to homeless persons in the Lower Wacker Drive Area of the next day's scheduled cleaning and the portable personal possession provision set forth in Paragraph 1.A.4. DFSS personnel will also attempt to give such notice on the morning of the cleaning.

3. If an off-street cleaning cannot be conducted on Thursday morning between the hours of 7:00 a.m. and 10:00 a.m. and is rescheduled for a different day and/or time, the City will provide the notice of the new day and/or time in the manner required by Section 1.B.1 & 1.B.2, and will also provide such notice seven (7) days in advance if feasible.

C. Regular Weekly Cleaning Procedures

1. During the weekly off-street cleanings, the City will not discard, or otherwise remove, any portable personal possessions if such possessions are attended by their owner or by another person on behalf of the owner.

2. The following provisions shall apply to: (a) items falling outside the definition of portable personal possessions, either because they exceed the limits in Paragraph I.A.4, or because they are items that are not of the type listed as a portable personal possession; and (b) items falling within the definition of portable personal possessions and the limits of Paragraph I.A.4, but which are unattended during the weekly off-street cleanings (with the exception of those objects designated in Paragraph I.C.4)). All such items are subject to being discarded by the City. Any such items that the City determines, during an off-street cleaning, to discard will, prior to being discarded, be marked with a notice. In the case of an item falling outside the definition of portable personal possessions, the notice will indicate that the item is stored on the public way and will be discarded unless it is removed from the Lower Wacker Drive Area before the next week's cleaning. In the case of an item falling within the definition of portable personal possessions but which is unattended, the notice will indicate that the item was found unattended and will be discarded if it is not removed from the Lower Wacker Drive Area or claimed before the next week's cleaning and, if claimed, attended during the next week's cleaning. These notices will be in the form of a sticker affixed to the item, and will contain the following information: (1) the date the item was encountered by the City; (2) the date by which the item will be discarded by the City if it is not removed from the Lower Wacker Drive Area by the owner, or, in the case of an unattended item falling within the definition of portable personal possessions, if the item is not claimed and attended; and (3) the contact information for DFSS should the owner have questions about the notice or this policy. The City will also provide oral notice of the portable personal possession requirements of this Paragraph and Paragraph I.A.4 to

any homeless individuals who are present at the time their items are marked with the stickers. As an alternative to the procedures described in this Paragraph, the City may instead determine that the item should be delivered to the Police Department for retention pursuant to the procedures set forth in Chicago Police Department General Order G07-01 and Special Order S07-01, and the orders referenced therein, or as otherwise allowed by law.

3. During an off-street cleaning, the following items may be discarded: (1) any items previously marked in accordance with Paragraph I.C.2 that have not been removed or claimed within the required timeframe or, if applicable, attended during the cleaning; (2) any material (including portable personal possessions) located in trash receptacles; (3) trash or debris of no apparent value, such as food and beverage containers, food remains, plastic and paper bags, cardboard boxes, and paper refuse; (4) items that constitute a potential threat to public health; and (5) items that are “oversized” (defined as any item that exceeds 3 feet in any two of the three dimensions, but excluding suitcases or other items defined as portable personal possessions) and that are obstructing the public way. If there is reasonable doubt about whether an unattended item is trash or debris of no apparent value, the item should be treated in accordance with Paragraph I.C.2.

4. Notwithstanding the above, the City will not discard the following items, if readily visible, during the weekly off-street cleanings: personal documents (such as personal identification, birth certificates, legal documents, personal or family photographs, and bills), personal medication, eyeglasses, money, and jewelry.

D. “Deep Cleaning” Procedures

1. On a periodic basis, the City may engage in “deep cleanings” of the off-street areas of Lower Wacker Drive, subject to staff availability, weather conditions, emergencies, and any public health requirements. Deep cleanings will be conducted on Thursday mornings between the hours of 7:00 a.m. and 10:00 a.m.

2. Because deep cleanings will generally involve the use of a power-washer, the portable personal possessions of homeless individuals must be moved to facilitate cleaning. At least seven (7) days prior to a deep cleaning, the City will identify temporary nearby locations in the Lower Wacker Drive Area where homeless persons who congregate in the Lower Wacker Drive Area may place portable personal possessions during the cleaning. The City will not designate any permanent locations for placement of portable personal possessions in the Lower Wacker Drive Area.

3. Not less than one-half hour prior to commencement of a deep cleaning, homeless persons in the Lower Wacker Drive Area must place portable personal possessions in the temporary locations designated pursuant to Paragraph I.D.2. In the alternative, not less than one-half hour prior to commencement of a deep cleaning, homeless persons must move all portable personal possessions not less than 50 feet from areas designated for cleaning. Items that are not placed in a temporary location or moved not less than 50 feet from areas designated for cleaning, and which impede or interfere with the cleaning, are subject to being discarded during the cleaning. In the alternative, the City may, if it elects, move such items to a temporary location designated pursuant to Paragraph I.D.2 and place a sticker on the item in accordance with

Paragraph I.C.2. Such items must be removed from the temporary location within 48 hours.

Items that are not so removed may be discarded by the City at that time.

4. For deep cleanings, the City will follow the notice procedures set forth in Paragraph I.B, with the exception that signs will be posted seven (7) days in advance of the cleaning in addition to 24 hours in advance of the cleaning, and the posted signs will state that a deep cleaning will occur and that all items must be moved to a temporary location designated by the City or at least 50 feet from the areas designated for cleaning. Additionally, at the same time that the City posts the signs, the City will attempt to give oral notice to homeless persons of the temporary location(s) identified by the City pursuant to Paragraph I.D.2.

E. Emergency Removal

1. The City will follow the procedures set forth above for weekly off-street cleanings and periodic deep cleanings, except as set forth in this Paragraph. The City need not follow the procedures set forth above in cases of “emergency removals,” which are cleanings, or the other removal or discarding of specific property, based on a reasonable belief or suspicion that an item or condition poses an immediate or imminent threat or hazard to the public safety or health, including an obstruction to traffic, or that exigent circumstances exist. The following examples of such situations are intended to be illustrative only and not to be an exhaustive list: an item is suspected to contain an explosive device or toxic substance; an item is blocking evidence of a crime; an item is preventing access to an emergency; the area is being flooded; the area’s infrastructure has become unsafe; the area must be secured for a special event where it is not feasible to provide advance notice; the area must be secured for emergency preparedness or

response. The City will in its discretion determine whether there is a reasonable belief or suspicion that circumstances present an immediate or imminent threat or hazard to the public safety or health or an obstruction to traffic or that exigent circumstances exist, as well as the manner in which the immediate or imminent threat, hazard, or obstruction will be abated or remediated. Prior to such emergency removal by abatement or remediation, the City will afford each homeless person who is present the opportunity to immediately remove his or her portable personal possessions, or those of others, to the extent that such removal is feasible and does not itself constitute or cause, or contribute to a persistence of, an immediate or imminent threat or hazard to the public safety or health or an obstruction of traffic or exigent circumstance. Any items that are not immediately removed by homeless persons may be discarded by the City if the City deems discarding the items to be necessary to abate or remediate the immediate or imminent threat or hazard to the public safety or health or the obstruction of traffic or exigent circumstance. If removal of the items by homeless persons would cause, constitute, contribute to, or allow to persist an immediate or imminent threat or hazard to the public safety or health or an obstruction of traffic or exigent circumstance, the items may be discarded by the City if the City deems this action necessary to abate or remediate the threat or hazard to the public safety or health or the obstruction of traffic. In exercising its discretion to determine and direct whether, how, when, and by whom an immediate or imminent threat or hazard or obstruction of traffic or exigent circumstance will be abated or remediated, the City will follow applicable local, state, and federal law.

F. Miscellaneous.

1. The City reserves the right to modify this policy at any time. Prior to amending the policy, the City will provide written notice of the proposed modifications to the Chicago Coalition for the Homeless and the Chicago Lawyers' Committee for Civil Rights Under Law at least thirty (30) days in advance. Within fourteen (14) days after providing such notice, the City will, upon request, consult with the Chicago Coalition for the Homeless and the Chicago Lawyers' Committee for Civil Rights Under Law regarding the proposed modifications. The City will also endeavor to give thirty (30) days' notice (both oral and written) of any modifications to homeless persons congregating in the Lower Wacker Drive Area or any other area covered by this Policy.

2. Nothing in this policy prevents the Police Department from confiscating, retaining, and disposing of property according to the procedures set forth in Chicago Police Department General Order G07-01 and Special Order S07-01, and the orders referenced therein, or as otherwise allowed by law.

3. Nothing in this policy prevents the City from enforcing all applicable laws in instances of non-compliance by homeless persons with the procedures stated above.

II. Off-street Cleaning Procedures for Other Areas

1. From time to time, the City may identify other areas where homeless persons congregate that require periodic off-street or deep cleanings. Presently, these include the Wilson Avenue Viaduct Area. The "Wilson Avenue Viaduct Area" means the portion of Wilson Avenue bounded by Marine Drive to the West, and by the northbound entrance and exit ramps to Lake

Shore Drive to the East, and includes the sidewalks along Wilson Avenue and the areas immediately adjacent to Wilson Avenue. The City may amend this list at any time.

2. For cleanings in these areas, the City will follow the procedures set forth in Paragraphs I.A.2-I.E. of this policy.

3. The Chicago Coalition for the Homeless may notify the City of other areas where the Coalition believes the procedures set forth in Paragraphs I.A.2-I.E. of this policy should be applied. Within 30 days, the City will inform the Coalition whether those procedures will be applied in the proposed areas and, if they will not be applied, provide an explanation for not doing so.

Appendix B | Complete Management Response



DEPARTMENT OF FAMILY AND SUPPORT SERVICES CITY OF CHICAGO

August 7, 2023

Deborah Witzburg
Inspector General for the City of Chicago
740 N. Sedgwick St., Suite 200
Chicago, IL 60654

Dear Inspector General Witzburg:

In response to the Office of Inspector General performance audit of the Department of Family and Support Services' outreach to encampments of people experiencing homelessness, I want to take the opportunity to place this important work in context of broader efforts to address homelessness in Chicago, including new and innovative approaches that are having a big impact.

The Department of Family and Support Services (DFSS) is the primary funder of the crisis response system for people experiencing homelessness in Chicago. We work closely with the Chicago Continuum of Care (CoC) and other City agencies who fund affordable and homeless-dedicated housing on a coordinated approach to preventing and ending homelessness. With our partners, our goal is to prevent homelessness whenever possible, maintain a safe and accessible crisis response system for households who do experience homelessness, and support households who experience homelessness in rapidly returning to stable housing.

We know the solution to homelessness is housing and national best practice is a 'housing first' approach that prioritizes providing permanent housing to households experiencing homelessness as the foundation for households to stabilize and thrive, without prerequisites or conditions. Our recent experience in Chicago demonstrates that this approach works. Examples of this work include:

- Our \$35 million investment of COVID-response funding housed 1,888 households from shelters and unsheltered locations between October 2020 and December 2022 and tested new practices to house more people faster including the Accelerated Moving Events mentioned in the report. This is a big increase compared to business as usual: in previous years, DFSS funding for rapid rehousing supported under 300 households each year. Currently, households housed through this initiative accounted for roughly 40% of households exiting from homelessness with CoC resources during that time period. Of households served, 73% went on to a permanent housing destination after services ended. In short, with additional resources, Chicago was able to exit many more people from homelessness.
- Continued funding in FY23 through the American Rescue Plan (ARP) of \$27 million and new annual investments in City funds of \$8 million will continue to support 1,000 households in housing and house an additional 1,200 new households, including monthly Accelerated Moving Events dedicated for unsheltered residents.

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Chicago is also making strides to address homelessness through expanded partnerships and innovative practices, including:

- DFSS is partnering with the Department of Housing (DOH) to improve the infrastructure of Chicago's homeless shelters to sustain bed capacity and better meet client needs, in line with national best practice and learnings from the pandemic. This is a unique opportunity for Chicago since the homeless services system rarely receives funds for capital projects. DFSS has qualified 10 shelters for funding for repair and renovation of existing facilities with a \$40 million investment and DOH is working with five shelters to acquire non-congregate buildings with a \$30 million investment. Overall, we expect investments to improve roughly 700-1,000 shelter beds, or between one-quarter to one-third of beds in the current DFSS-supported shelter system.
- DFSS will also be releasing a Request for Proposals this summer for a new low-barrier shelter to connect more residents experiencing unsheltered homelessness to safe shelter, supportive services, and connection to housing.

However, we also face new and continuing challenges:

- Since August 2022, Chicago has welcomed over 12,000 new arrivals from the southwest border of the U.S. and currently is providing emergency shelter for over 6,000 new arrivals.
- We are seeing an increase in households accessing homeless shelters following a reduction during the pandemic, reflecting both a return in shelter capacity but also increased need as federal COVID stimulus payments and expanded homeless prevention support ended.
- Chicago is seeing a loss of lower-cost rental units in the housing market, which both may lead more new households to experience homelessness and housing instability and limits pathways for households to exit homelessness. Research by the Institute for Housing Studies found a 190,000+ unit gap between the supply of affordable rental housing and demand, the largest in over a decade.
- Lastly, the successes we've seen in recent years have been primarily funded through time-limited federal resources, specifically CARES Act funding and ARP funding. Continued progress will require continued investments. To expand to sustainably serve new arrivals and to serve households experiencing doubled-up homelessness or housing instability, the need for continued investment is even greater.

Within this context, we continue to see persistent unsheltered homelessness, including in encampment locations across the city and on public transportation. This crisis disproportionately impacts Black Chicagoans. Although roughly one-third of Chicago residents are Black/African American, 67% of unsheltered individuals are Black/African American.

DFSS continues to lead and coordinate a multi-agency response to encampments through the city with the goals of reducing the number of people experiencing homelessness living in large encampments; providing multiple social service programs to meet needs; protecting the legal rights of persons experiencing homelessness while protecting their health and safety and that of the community at large; and continuously engaging to support movement to shelter and housing.

On a monthly basis, DFSS convenes outreach agencies to discuss challenges, share best practices, and review key performance data. This coordination also includes a newly expanded partnership with the

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Chicago Transit Authority, including a CTA investment of \$2 million in 2023 to expand outreach on the Red and Blue train lines. Through this partnership, DFSS, CTA, and outreach providers meet monthly to discuss progress and recently piloted an Accelerated Moving Event for frequent riders in July 2023.

Additional information on our approach, including Chicago's progress on applying national best practices, can be found in the 2023 Annual Homeless Report to City Council on the DFSS website.

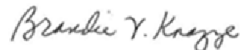
We are also excited for several upcoming opportunities to strengthen and expand our approach to reducing unsheltered homelessness, building on the City's current encampment strategy. In February 2023, HUD awarded the Chicago Continuum of Care a new grant of \$60 million, to be awarded over three years, as part of awards to communities across the country to address unsheltered homelessness.

Chicago was also selected as one of six jurisdictions to be part of a new national initiative called All INside managed by the U.S. Interagency Council on Homelessness and the White House in Spring 2023. The national initiative has a goal of reducing homelessness by 25% by 2025. Chicago has welcomed a dedicated federal HUD official, Michele Smith, to accelerate and support locally driven strategies to reduce unsheltered homelessness.

Our approach moving forward must include both continued coordination and innovation in our crisis response approach and scaled investment in a 'housing first' approach to sustainably address encampments and unsheltered homelessness in Chicago.

Thank you for the attention to our critical work addressing encampments and the opportunity to speak to DFSS' work to prevent and end homelessness in Chicago.

Sincerely,



Brandie V. Knazze
Commissioner

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Management Response Form

Project Title: Audit of DFSS Outreach to Encampments of People Experiencing Homelessness

Project Number: 22-0078

Department Name: Department of Family and Support Services (DFSS)

Date: August 7, 2023

Department Head: Brandie Knazze

OIG Recommendation	Agree/Disagree	Department's Proposed Action	Implementation Target Date	Party Responsible
1. DFSS should consider updating the Homeless Services FAQs sheet it shares with Council members to include the City Policy and Procedures Governing Off-Street Cleaning. Additionally, it should communicate with Council members regarding that policy and how it protects the rights of people experiencing homelessness and governs the City's encampment response.	Agree	DFSS will include the Policies and Procedures Governing Off-Street Cleaning as an attachment to the FAQ sheet we provide to City Council. Additionally, DFSS, in coordination with the Department of Housing, is newly responsible for submitting and publishing an annual report to City Council on homelessness and housing in Chicago, including reporting on progress on implementation of national best practices for addressing encampments. DFSS will include information in this report on policies and procedures for cleaning and how this aligns with the City's encampment response.	Updated FAQ to be shared during FY24 budget hearings Annual report submitted by DFSS 7/31/23	DFSS



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For further information about this report, please contact the City of Chicago Office of Inspector General, 740 N. Sedgwick St., Suite 200, Chicago, IL 60654, or visit our website at igchicago.org.

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