

**TESTIMONY OF CHARLES J. WILLOUGHBY
INSPECTOR GENERAL**

**BEFORE THE D.C. COUNCIL
COMMITTEE ON HUMAN SERVICES**

**ROUNDTABLE TO DISCUSS THE SPECIAL EVALUATION OF THE D.C. VILLAGE
EMERGENCY SHELTER FOR HOMELESS FAMILIES
FEBRUARY 12, 2007 – 3:00PM**

GOOD AFTERNOON CHAIRMAN WELLS AND MEMBERS OF THE COMMITTEE. I WELCOME THIS OPPORTUNITY TO SHARE WITH YOU THE RESULTS OF OUR SPECIAL EVALUATION OF THE D.C. VILLAGE EMERGENCY SHELTER FOR HOMELESS FAMILIES. SEATED AT THE TABLE WITH ME IS EDWARD FARLEY, DEPUTY ASSISTANT INSPECTOR GENERAL FOR INSPECTIONS AND EVALUATIONS, WHO LED THE EVALUATION. OUR TESTIMONY WILL PROVIDE BACKGROUND ON WHY AND HOW THE EVALUATION WAS CONDUCTED, AND WILL HIGHLIGHT THE TEAM'S MOST CRITICAL FINDINGS.

BACKGROUND

THE D.C. VILLAGE EMERGENCY SHELTER FOR HOMELESS FAMILIES IS A 24-HOUR FACILITY LOCATED IN A COMPLEX OF D.C. GOVERNMENT BUILDINGS NEAR THE BLUE PLAINS WASTEWATER TREATMENT PLANT IN SOUTHWEST WASHINGTON, D.C. WITH A DAILY POPULATION OF ROUGHLY 200-250 PEOPLE, D.C. VILLAGE PROVIDES TEMPORARY LIVING QUARTERS FOR ADULTS AND CHILDREN WHO ARE CONSIDERED EITHER HOMELESS OR AT "IMMINENT RISK OF BECOMING HOMELESS" AS DEFINED BY THE DISTRICT'S HOMELESS SERVICES REFORM ACT OF 2005. THROUGH A CONTRACT WITH THE D.C. DEPARTMENT OF HUMAN

SERVICES (DHS), THE COMMUNITY PARTNERSHIP FOR THE PREVENTION OF HOMELESSNESS (TCP), A NON-PROFIT ORGANIZATION, IS RESPONSIBLE FOR ESTABLISHING AND ADMINISTERING SUB-CONTRACTS WITH HOMELESS SERVICE PROVIDERS THROUGHOUT THE CITY. THE COALITION FOR THE HOMELESS (COALITION), IS THE SUBCONTRACTED, NON-PROFIT ORGANIZATION THAT IS RESPONSIBLE FOR THE DAY-TO-DAY OPERATION OF D.C. VILLAGE.

IN SEPTEMBER 2005, THEN COUNCILMEMBER ADRIAN FENTY, CHAIRMAN OF THE COMMITTEE ON HUMAN SERVICES, SENT A LETTER TO THEN CITY ADMINISTRATOR ROBERT BOBB IN WHICH HE EXPRESSED CONCERN THAT DHS WAS NOT ADEQUATELY ADDRESSING POOR LIVING CONDITIONS AT THE SHELTER. ON OCTOBER 28, 2005, MR. FENTY ASKED THE OFFICE OF THE INSPECTOR GENERAL TO INSPECT AND EVALUATE THE MANAGEMENT, SERVICES PROVIDED TO RESIDENTS, AND HEALTH AND SAFETY CONDITIONS AT THE SHELTER. SPECIFICALLY, MR. FENTY WROTE:

**IT APPEARS THAT A LACK OF CONTRACT
OVERSIGHT BY BOTH DHS AND TCP HAS LED, IN
PRACTICE, TO A SITUATION WHERE NO ONE IS HELD
RESPONSIBLE FOR THE PROVISION OF EFFECTIVE
AND EFFICIENT SERVICES IN ACCORDANCE WITH
APPLICABLE DISTRICT LAW.... [I]T IS CLEAR THAT
THE PATCHWORK SERVICES OFFERED AT D.C.
VILLAGE FALL SHORT OF THE “CONTINUUM OF**

**CARE” MODEL THAT IS AT THE CORE OF THE
DISTRICT’S CONTRACT WITH TCP.**

THE OBJECTIVE OF THIS SPECIAL EVALUATION WAS TO ANSWER FUNDAMENTAL QUESTIONS REGARDING CONDITIONS, MANAGEMENT, AND OVERSIGHT OF THE FACILITY, QUESTIONS SUCH AS:

- ARE TCP AND THE COALITION MEETING THEIR CONTRACTUAL OBLIGATIONS?
- DO THE SERVICES PROVIDED AND THE CONDITIONS AT D.C. VILLAGE COMPLY WITH THE HOMELESS SERVICES REFORM ACT OF 2005?
- ARE CONTRACT REQUIREMENTS AND LINES OF ACCOUNTABILITY AND RESPONSIBILITY AMONG DHS, TCP, AND THE COALITION CLEAR AND EFFECTIVE?
- ARE MANAGEMENT AND OVERSIGHT OF THE FACILITY ADEQUATE?

THE OIG CONDUCTED INSPECTION ACTIVITIES FROM JANUARY 2006 TO NOVEMBER 2006. DURING THIS PERIOD, THE INSPECTION TEAM INTERVIEWED EMPLOYEES OF DHS, TCP, AND THE COALITION. THE TEAM ALSO REVIEWED A VARIETY OF DOCUMENTS, INCLUDING:

- THE HOMELESS SERVICES REFORM ACT OF 2005 (REFORM ACT);
- UNIVERSAL SHELTER RULES FOR TEMPORARY SHELTERS GOVERNED BY THE REFORM ACT;

- ADDITIONAL PROGRAM RULES FOR D.C. VILLAGE, AS APPROVED BY DHS IN SEPTEMBER 2006;
- TCP'S CONTRACT WITH DHS AND THE COALITION'S CONTRACT WITH TCP;
- BUDGET DOCUMENTS;
- FACILITY MAINTENANCE AND REPAIR INVOICES AND EXPENDITURE INFORMATION;
- DHS AND TCP MONITORING REPORTS; AND
- NEWSPAPER ARTICLES AND PUBLIC HEARING TESTIMONY.

ON DECEMBER 18, 2006, THE OIG DELIVERED ITS COMPLETED REPORT OF INSPECTION TO CHAIRMAN FENTY. THE REPORT IS CURRENTLY AVAILABLE ON THE OIG'S WEBSITE. I WILL NOW DISCUSS THE REPORT'S MOST CRITICAL FINDINGS.

HEALTH AND SAFETY CONDITIONS

FINDING: THE ACCOMMODATIONS AT D.C. VILLAGE DO NOT COMPLY WITH DISTRICT LAW. UNDER THE REFORM ACT, HOMELESS FAMILIES MAY NOT BE PLACED IN "NON-APARTMENT STYLE SHELTERS." THE ACT DEFINES "APARTMENT-STYLE" SHELTERS AS HOUSING UNITS WITH:

- (A) SEPARATE COOKING FACILITIES AND OTHER BASIC NECESSITIES TO ENABLE FAMILIES TO PREPARE AND CONSUME MEALS;

- (B) SEPARATE BATHROOM FACILITIES FOR THE USE OF THE FAMILY; AND
- (C) SEPARATE SLEEPING QUARTERS FOR ADULTS AND MINOR CHILDREN....

D.C. VILLAGE AFFORDS RESIDENTS NONE OF THESE ACCOMMODATIONS. UNRELATED FAMILIES SHARE ROOMS THAT LACK PRIVATE BATHING AND COOKING FACILITIES. SOME RESIDENTS SLEEP IN CUBICLES, LOCATED IN SO-CALLED “OVERFLOW AREAS,” THAT DO NOT HAVE INDIVIDUAL DOORS.

FINDING: D.C. VILLAGE EMPLOYEES WHO HAVE DIRECT CONTACT WITH FAMILIES AND CHILDREN HAVE NOT HAD CRIMINAL BACKGROUND CHECKS AS REQUIRED BY CONTRACT AND D.C. LAW. THE COALITION WAS NOT CONDUCTING REQUIRED CRIMINAL BACKGROUND CHECKS OF ITS EMPLOYEES. THE OIG IS CONCERNED NOT ONLY WITH THE FACT THAT THE COALITION WAS NOT CONDUCTING THE REQUIRED CHECKS, BUT ALSO THAT NEITHER DHS NOR TCP HAD IDENTIFIED THIS AS CONTRARY TO PROCEDURE AND A MATTER THAT MUST BE ADDRESSED.

FINDING: THE INSPECTION TEAM FOUND NO DOCUMENTATION OF REQUIRED SUBSTANCE ABUSE SCREENING FOR D.C. VILLAGE EMPLOYEES. THE INSPECTION TEAM FOUND NO EVIDENCE THAT THE COALITION WAS COMPLYING WITH THE CONTRACTUAL REQUIREMENT THAT IT ESTABLISH AND MAINTAIN A PROGRAM TO RANDOMLY TEST ALL EMPLOYEES WHO HAVE

DIRECT CONTACT WITH FAMILIES AND CHILDREN. DHS STATED THAT NEITHER TCP NOR THE COALITION HAD SUBMITTED ANY DOCUMENTATION WITH RESPECT TO THE DRUG AND ALCOHOL TESTING OF “SAFETY SENSITIVE” EMPLOYEES WORKING AT THE SHELTER. THE NEED FOR TESTING PROTOCOLS IS REINFORCED BY THE FACT THAT STAFF AND RESIDENTS ACKNOWLEDGE THE PRESENCE OF ILLICIT DRUGS AND ALCOHOL AT D.C. VILLAGE.

FINDING: THERE IS NO OCCUPANCY LIMIT AT D.C. VILLAGE. IT IS NOT UNCOMMON FOR SIX OR MORE INDIVIDUALS TO SHARE ONE ROOM, FOR CHILDREN TO SHARE BEDS, AND FOR SHELTER RESIDENTS TO SLEEP IN SPACES USED AS RECREATION AREAS DURING WAKING HOURS. A FACILITY CAPACITY BASED ON A NUMBER OF PERSONS HAS NOT BEEN ESTABLISHED, DESPITE A PREVIOUS GOVERNMENT COMMITMENT TO ESTABLISH AN OCCUPANCY LIMIT.

FINDING: THE SINGLE-STORY BUILDINGS THAT HOUSE D.C. VILLAGE PRESENT NUMEROUS GROUND-LEVEL POINTS OF ENTRY AND DO NOT AFFORD ADEQUATE SAFETY AND SECURITY TO RESIDENTS, SOME OF WHOM ARE VICTIMS OF DOMESTIC ABUSE AND ARE EXTREMELY VULNERABLE. WOMEN AND CHILDREN REPRESENT THE MAJORITY OF D.C. VILLAGE RESIDENTS, AND EMPLOYEES NOTED THAT A SIGNIFICANT NUMBER OF WOMEN HAVE BEEN ASSAULTED, ABUSED, OR STALKED BY PEOPLE THEY KNOW WHO MAY STILL REPRESENT A THREAT TO THEM. THESE CIRCUMSTANCES MAKE THE NEED FOR PROPERLY SECURED BUILDINGS CRITICAL.

FINDING: THERE IS NO SYSTEM IN PLACE TO SAFEGUARD AND SECURE RESIDENTS' PRESCRIPTION MEDICATIONS. GIVEN THE COMMUNAL NATURE OF THE ACCOMMODATIONS AND THE PRESENCE OF CHILDREN, THIS CONDITION POSES A SIGNIFICANT RISK TO RESIDENTS' SAFETY. IT IS COMMON FOR RESIDENTS TO POSSESS PRESCRIPTIONS FOR ASTHMA MEDICATION, PAIN RELIEVERS, MEDICATIONS TO TREAT ANXIETY, DEPRESSION, SLEEPLESSNESS, MENTAL HEALTH CONDITIONS, HIV/AIDS, AND DRUGS USED IN CONJUNCTION WITH SUBSTANCE ABUSE TREATMENT. THE OIG IS CONCERNED BY THE POTENTIAL FOR ACCIDENTAL OR DELIBERATE INGESTION BY SOMEONE OTHER THAN THE PRESCRIBED USER. THERE IS ALSO THE POTENTIAL FOR THEFT OF UNSECURED PRESCRIPTION MEDICATIONS BY RESIDENTS OR VISITORS.

SERVICES PROVIDED TO RESIDENTS

FINDING: THERE ARE NO "CUSTOMER SERVICE" CRITERIA REGARDING THE TIMELY PROVISION OF SERVICES TO RESIDENTS, MANY OF WHOM ARE FACING ACUTE PHYSICAL AND MENTAL HEALTH CONDITIONS. CRITERIA IN THE REFORM ACT AND IN TCP AND COALITION CONTRACT DOCUMENTS ARE NOT SUFFICIENT TO ENSURE THAT RESIDENTS' NEEDS ARE MET IN A TIMELY FASHION. NOWHERE IN ANY OF THESE DOCUMENTS IS IT WRITTEN THAT RESIDENTS CAN EXPECT TO BE SEEN BY A SERVICE PROVIDER, SUCH AS A MEDICAL DOCTOR, MENTAL HEALTH COUNSELOR, OR SUBSTANCE ABUSE COUNSELOR WITHIN A SPECIFIC TIMEFRAME. MANY RESIDENTS HAVE

ACUTE PHYSICAL AND MENTAL HEALTH CONDITIONS, AND TIMELY ACCESS TO DOCTORS AND COUNSELORS IS CRUCIAL. ABSENT SPECIFIC GOALS OR TIMEFRAMES FOR SERVICE PROVISION, THERE ARE NO CRITERIA BY WHICH TO MEASURE THE TIMELINESS OF SERVICE DELIVERY.

FINDING: HIGH TURNOVER AMONG D.C. VILLAGE CASE MANAGERS CAUSED STAFFING SHORTFALLS, WHICH IN TURN LED TO DELAYS IN CASE MANAGEMENT SERVICES. “NO SHOW” APPOINTMENTS ALSO ARE A COMMON OCCURRENCE AND IMPACT RESIDENTS’ TIMELY ACCESS TO CASE MANAGEMENT SERVICES. CASE WORKERS SAID THAT IT IS COMMON FOR A FAMILY TO MISS SEVERAL SCHEDULED APPOINTMENTS BEFORE THEY ATTEND THEIR FIRST MEETING.

FINDING: EVEN THOUGH THEY COMPLY WITH MINIMAL REQUIREMENTS OF THE HOMELESS SERVICES REFORM ACT, PHYSICAL AND MENTAL HEALTH SERVICES AVAILABLE TO RESIDENTS DO NOT ADEQUATELY MEET THEIR ACUTE NEEDS. CHILDREN’S PHYSICAL HEALTH NEEDS ARE ADDRESSED USING BOTH ON-SITE RESOURCES AND REFERRALS TO OFF-SITE SERVICE PROVIDERS. HOWEVER, THERE IS AN ACUTE NEED FOR ON-SITE MENTAL HEALTH SERVICES FOR CHILDREN. ACCORDING TO A PEDIATRIC CLINICAL NURSE SPECIALIST WHO WORKS REGULARLY AT D.C. VILLAGE, CHILDREN HOUSED THERE ARE ANXIOUS, AFRAID, AND AT RISK OF DEVELOPING LEARNING PROBLEMS. SHE BELIEVES THAT ALL RESIDENTS, BUT ESPECIALLY

CHILDREN, SHOULD BE MET BY A CRISIS INTERVENTION TEAM WITHIN 48 HOURS OF ARRIVING AT D.C. VILLAGE. THE NURSE SPECIALIST ALSO SAID THAT ON-SITE INDIVIDUAL AND GROUP THERAPY FOR CHILDREN SHOULD BE A TOP PRIORITY.

FINDING: THERE IS NO ON-SITE PHYSICAL OR MENTAL HEALTH CARE FOR ADULT RESIDENTS. THERE IS ALSO NO ON-SITE SUBSTANCE ABUSE TREATMENT FOR ADULTS, DESPITE THE FACT THAT THE MAJORITY OF RESIDENTS REPORT SUBSTANCE ABUSE PROBLEMS.

BUDGET ISSUES

FINDING: D.C. VILLAGE CONSUMED OVER 60% OF THE FUNDS DHS HAD EARMARKED FOR REPAIR AND MAINTENANCE OF THE 11 DISTRICT OWNED BUILDINGS USED FOR HOMELESS SERVICES PROGRAMS. DURING THE FIRST YEAR OF ITS CONTRACT WITH TCP, DHS PROVIDED \$350,000 FOR REPAIR AND MAINTENANCE OF 11 DISTRICT-OWNED BUILDINGS OCCUPIED BY HOMELESS SERVICES PROGRAMS. REPAIR AND MAINTENANCE EXPENDTURES FOR D.C. VILLAGE CONSUMED THE MAJORITY OF THESE FUNDS. THIS CONDITION MAY BE DIVERTING FUNDS FROM MUCH NEEDED REPAIR AND MAINTENANCE PROJECTS AT OTHER SHELTER FACILITIES. THEREFORE, WE RECOMMENDED THAT THE DIRECTOR OF DHS REQUEST AN AUDIT AND ANALYSIS OF FISCAL YEAR 2006 MAINTENANCE AND REPAIR EXPENDITURES AT ALL 11 DISTRICT-OWNED FACILITIES COVERED BY TCP'S CONTRACT WITH DHS.

FINDING: DESPITE THE CRITICALITY OF THE CASE MANAGER AND ON-SITE SHELTER MONITOR POSITIONS, MINIMAL FUNDING IS AVAILABLE TO TRAIN THEM. FEW RESOURCES ARE DEVOTED TO TRAINING CASE MANAGERS, ON-SITE MONITORS, AND SHIFT SUPERVISORS. ON-SITE MONITORS AND THEIR SUPERVISORS ARE THE “FIRST RESPONDERS” IN THE SHELTER, AND THE LACK OF TRAINING MAY COMPROMISE THEIR PERSONAL SAFETY AND EFFECTIVENESS. ON-SITE MONITORS ARE RESPONSIBLE FOR ENFORCING SHELTER RULES, DEFUSING DISAGREEMENTS AND ALTERCATIONS, RECOGNIZING ANGER OR DEPRESSION IN RESIDENTS, AND IN GENERAL, MAINTAINING A SAFE ENVIRONMENT FOR ALL RESIDENTS. MANY MONITORS HAVE NO PREVIOUS EXPERIENCE IN THIS TYPE OF POSITION, WHICH FURTHER EMPHASIZES THE NEED FOR REGULAR, ONGOING TRAINING.

CONCLUSION

OUR REPORT CONTAINS A NUMBER OF RECOMMENDATIONS THAT ARE INTENDED TO ASSIST DHS, TCP, AND THE COALITION IN CLEARLY IDENTIFYING D.C. VILLAGE’S PROBLEMS AND TAKING ACTION TO MITIGATE THEIR IMPACT ON RESIDENTS. HOWEVER, THE TEAM BELIEVES THAT THE LACK OF APARTMENT-STYLE ACCOMMODATIONS WITHIN THE DISTRICT IS AN OVERARCHING ISSUE THAT CALLS FOR A COLLABORATIVE EFFORT LED BY THE DEPARTMENT OF HUMAN SERVICES, TO INCLUDE THE EXECUTIVE OFFICE OF THE MAYOR AND THE CITY COUNCIL.

THAT CONCLUDES MY TESTIMONY, AND WE WILL BE HAPPY TO RESPOND TO
ANY QUESTIONS YOU MAY HAVE. THANK YOU.