



Deborah Kafoury Multnomah County Chair

December 1, 2021

Jennifer McGuirk, MPA, CIA
Multnomah County Auditor
501 SE Hawthorne Blvd., Room 601
Portland, OR 97214

Dear Auditor McGuirk,

I would first like to extend my gratitude to you and your staff for initiating a “living conditions audit” last August. We were encouraged that your office considered it a high priority to assess the health and safety of housing for those the Joint Office of Homeless Services (Joint Office) has placed into permanent housing.

We remain committed to working closely with you and your office in the interest of accountability and improving our standards. In this spirit, I am pleased with the transparency with which the Joint Office coordinated with your office, believing that the auditing function can strengthen local government, and provide accountability for services and dollars. I am also pleased that the Joint Office has been open and transparent in its work to improve data tracking and update the systems it has inherited.

On Friday, Nov. 19, you alerted me to a memo of concern that would be shared that afternoon. Neither myself nor the Joint Office Director had prior knowledge of the draft memo. I appreciate your willingness to meet on Nov. 23 to better understand the concerns. It was important that we had an opportunity to vet your preliminary conclusions with Joint Office leadership and subject-matter experts before formalizing our response. I also appreciate your team being willing to review your initial memo and then make updates based on the feedback, additional data and context provided by the Joint Office team.

Based on the updated memo you provided to me on Nov. 29, I would like to provide my response to your concerns.

As you may recall, the Portland Housing Bureau and the Department of County Human Services retained responsibilities for data management for the adult system and the youth and family systems, respectively, even after the formation of the Joint Office. But it wasn't until earlier this year when the Joint Office assumed some responsibilities from the Portland Housing Bureau. These include data-quality monitoring for the Adult homelessness system, as well as a range of other database administration functions. Overall responsibility for database administration remains with the Portland Housing Bureau.

The Joint Office reported the traditional housing program enrollment numbers because, up until now, they were the most reliable numbers available. When you began the housing quality audit, the Joint Office shared all of its data on housing placements and was explicit about the limitations in the data and the work the Joint Office was doing to roll out a more accurate measure.

Generating reliable collection and reporting of a new metric across multiple housing providers, and without direct control over the data system, would take time to implement under the best of circumstances. But a combination of challenges and crises — technical issues with the reporting platform, limited staff capacity, the disruption of the COVID-19 global pandemic, the wildfire smoke emergency, a life-threatening winter storm, and three historic heat events — has put an unprecedented strain on the Joint Office and its providers. And that has made implementing a new metric significantly more challenging.

But, as we also shared with you, the Joint Office is at the point now of being able to report a new housing placement metric built not just on move-in data, but also including additional housing outcomes that the previous enrollment metric omitted. The information is online and included in our upcoming FY2022 Q1 report.

The good news is that if you look at the difference between the number of households that moved to permanent housing reported in FY20 and FY21, the difference between the enrollment metric and the new metric is much smaller than what your letter's partial analysis describes.

I would like to reiterate that we support any review that seeks to improve housing standards and improve access and accountability. We understand that the information you said you needed, specifically addresses, couldn't be easily provided in the form you initially sought. However, I would also like to note that the Joint Office staff offered to work directly with its community-based providers to help obtain information you need for

the audit. Should you choose to reconsider and resume the audit, the Joint Office's offer of assistance and support remains in place.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Kafoury". The signature is written in a cursive, flowing style.

Deborah Kafoury
Multnomah County Chair



Dec. 1, 2021

Jennifer McGuirk, MPA, CIA Multnomah County Auditor
501 SE Hawthorne Blvd., Room 601 Portland, OR 97214

Dear Auditor McGuirk,

The Joint Office of Homeless Services is committed to obtaining and transparently reporting accurate data.

Your letter highlights an opportunity for improving our housing placement metrics that we had already identified and have been working diligently to achieve.

In fact, as you can see, the Joint Office has already publicly posted its new housing metric, as part of [our report on system outcomes for the first quarter of Fiscal Year 2022](#).

Plans to update our housing metric, starting with the first-quarter report this year, were in place well before the audit began. And they underscore our commitment to quality improvement and more rigorous data reporting. The Auditor's office was aware of that imminent timeline, yet that was not referenced or acknowledged in the most recent version of your letter.

Even before the Joint Office was formed, housing program enrollments were reported as the measure of housing placements. We transparently included that definition in our past public quarterly and annual data reports, posted at ahomeforeveryone.net/outcome-reports. Until now, those were the most reliable numbers available to us.

As part of our proactive work to improve our data, however, we have shifted to a new metric that includes two new sources of data: housing move-in dates for people enrolled in housing programs, and housing outcomes for people who left shelters and transitional housing settings for housing that isn't part of a program.

We believe this new metric more accurately captures our providers' compassionate, painstaking and difficult work helping thousands of people end their homelessness.

As we compare data for the past two fiscal years, there is not a significant difference between the reported number of people who exited homelessness to housing using the legacy metric and our new metric. Because your memo references just one of the two new inputs in our new metric, it overstates the difference.

Comparing numbers for FY 2021, for example, a recent data pull using the legacy metric showed 3,595 people newly served in those 12 months. Our improved metric showed 3,221 people, a difference that's much smaller than what your analysis describes. (The data cited here is a subset of what was reported in the official annual report; it doesn't include placements through providers that have additional data restrictions that prevent standard access.)

But we also expect that number to improve with time, as data-entry improves, like it would with any new metric.

It must be noted that the providers who do the work of housing people are still adapting to the use of this new metric, tracking move-in dates and other positive housing outcomes. We believe you should have better reflected this in your letter.

Because providers are still adjusting their data-entry practices, some of the perceived gap between enrollments and move-in dates could reflect a single missing data point in someone's case record, rather than a missing lease or rent payment. And as providers adapt, those data-entry issues can be expected to improve.

Without reflecting that, your letter could give some readers the mistaken impression that the entire difference in outcomes means someone never moved into housing at all. That would be an oversimplification and also inaccurate.

We acknowledge and share your concern about the amount of time it has taken to fully operationalize the shift to the new measure. But shifting to a new housing metric is more complicated than just adding a data field. We faced particular challenges with the community's data platform and the work needed to adopt a new reporting mechanism. And then we needed to introduce that mechanism to dozens of community-based organizations.

We did that work with the Portland Housing Bureau and the Department of County Human Services. Those entities shared oversight with the Joint Office for many of the community's homelessness-data-related responsibilities during this period of time.

The Joint Office assumed data-reporting and training responsibility from DCHS for the Youth and Family homelessness systems in summer 2020. But it wasn't until earlier this year when the Joint Office assumed some responsibilities from the Portland Housing Bureau. These include data-quality monitoring for the Adult homelessness system, as well as a range of other database administration functions. Overall responsibility for database administration remains with the Portland Housing Bureau.

We have worked with our partners and our providers to overcome these challenges. But this improvement work is just one part of a much larger and ongoing effort to improve our data quality.

Even as we worked to assume oversight of our community's data systems, we added in-house data capacity. We shifted from issuing static PDF data reports to interactive and deeper data presentations via Tableau.

And with the advent of the Metro Supportive Housing Services Measure, we are working with a national organization called Community Solutions to improve our data quality and outcome tracking for the chronically homeless population. We've also added a program evaluation manager, and are championing efforts to align system reporting standards across the three Metro Counties.

At the same time, while the Joint Office has been tackling all of these issues, our entire community found itself facing a pandemic and multiple climate crises. For nearly two years, those cascading emergencies have stretched not just the Joint Office but also our providers.

We are confident that we could have made faster headway on shifting to the new housing metric if not for the work needed to save lives and respond to these emergencies.

We believe the fact that we were pursuing this data improvement on our own, and have already shared it — work that began well before you contacted us — should be highlighted as an encouraging sign of accountability.

Sincerely,

A handwritten signature in blue ink, appearing to read 'MJ', with a long horizontal stroke extending to the right.

Marc Jolin,
Director, Joint Office of Homeless Services